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

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

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

- Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.)
- Temporary Assistance for Needy Families Program (42 U.S.C. 601 et seq.)
- Employment and Training Programs under the Supplemental Nutrition Assistance Program (Programs authorized under section 6(d)(4) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(d)(4)))
- Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))
- Trade Adjustment Assistance for Workers Programs (Activities authorized under chapter 2 of Title II of the Trade Act of 1974 (19 U.S.C. 2271 et seq.))
- Jobs for Veterans State Grants Program (Programs authorized under 38, U.S.C. 4100 et. seq.)
- Unemployment Insurance Programs (Programs authorized under State unemployment compensation laws in accordance with applicable Federal law)
- Senior Community Service Employment Program (Programs authorized under Title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))
- Employment and training activities carried out by the Department of Housing and Urban Development
- Community Services Block Grant Program (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))
- Reintegration of Ex-Offenders Program (Programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))
* States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development and programs authorized under section 6(d)(4) and 6(o) of the Food and Nutrition Act of 2008 that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.
The major content areas of the Unified or Combined State Plan include strategic and operational planning elements. WIOA separates the strategic and operational elements to facilitate cross-program strategic planning.

- **The Strategic Planning Elements** section includes analyses of the State’s economic conditions, workforce characteristics, and workforce development activities. These analyses drive the required vision and goals for the State’s workforce development system and alignment strategies for workforce development programs to support economic growth.

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

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

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

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

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

**Combined State Plan.** This plan includes the Adult Worker Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and Vocational Rehabilitation Program as well as one or more of the optional combined State Plan partner programs identified below. No
Indicate which Combined Plan partner program(s) the state is electing to include in the plan.

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

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

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

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

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

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

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

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

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

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

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

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

ANALYSIS

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

A. ECONOMIC ANALYSIS

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

I. EXISTING DEMAND INDUSTRY SECTORS AND OCCUPATIONS

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

II. EMERGING INDUSTRY SECTORS AND OCCUPATIONS

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.

I. STRATEGIC ELEMENTS. The Unified 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. (a) (1) (A) Economic Analysis: Unified State Plan must include an analysis of economic conditions and trends in CT (including sub-state regions and any specific economic areas identified by the State). Our shared history in Connecticut demonstrates a commitment to new ideas and betterment of the old. From the invention of the sewing machine to decades of leading the insurance industry to the development and production of fuel cells, we in Connecticut have spent centuries showing the world how to improve. From world-ranking productivity to one of the highest levels of foreign direct investment, Connecticut models the attributes that are defining the modern economy. As we move further into the 21st century, Connecticut is dedicated to continuing to innovate and live up to our rich history as a national and world leader. Connecticut’s strength starts with its people. We have the third most educated workforce in the nation, as well as the healthiest residents and the highest per capita income. We are a community of forward-thinkers, innovators, and researchers. By aligning education more closely with the needs of the private sector, Connecticut is ensuring that future generations have the skills to transform our world. Connecticut also possesses an unparalleled quality of life. The abundance of natural resources, extensive network of cultural and creative assets, and variety of communities make Connecticut a great place to live and do business. Our location is ideal for residents and businesses alike, with ready access to major markets, financial centers, and colleges and universities. Within a one-day drive from Central Connecticut is one-third of the U.S. economy and two-thirds of the Canadian economy, making Connecticut one of the best locations in the nation. (Source: CT Economic Development Strategy, Connecticut Department of Economic and Community Development.) According to the 2015 Connecticut Economic Review by Eversource,
Connecticut ranks first in the nation in terms of having healthy residents, third in the nation in terms of its share of finance and insurance jobs, third in the nation in terms of advanced degrees per capita, fourth in the nation in terms of innovation, fourth in nation in productivity per capita, fifth in nation for business research and development per capita, fifth in the nation for scientists and engineers per capita, sixth in energy efficiency, seventh in venture capital deals per one million residents, and seventh in the nation in patents per 100,000 workers.

On February 3, 2016, Governor Dannel P. Malloy gave his State of the State Address to the House of Representatives at the State Capitol. For the most part he addressed the need for change, presenting five budget principles: limit our spending to available resources; address unsustainable and post-employment costs; prioritize funding for core services; and hold state agencies accountable to the public and state legislature for their results. But he also recognized that progress is happening in Connecticut illustrated by these examples: As a result of Connecticut’s concerted efforts to grow its economy, the private sector has grown more than 80,000 jobs in the last five years. Since July of 2015, Connecticut has secured employers such as Synchrony Financial and welcomed new employers like Serta Simmons from Massachusetts and MC Credit Partners from New York. These employers alone will create and retain more than 700 jobs in Connecticut. In January 2016 Electric Boat announced plans to add 800 new jobs to its workforce this year and 4,000 jobs in the years to come. Connecticut has held onto major employers such as United Technologies and Sikorsky along with their 24,000 employees. Connecticut is supporting more small businesses than ever before. In 2015 Connecticut’s Small Business Express Program worked with more than 230 businesses to create or retain more than 4,400 jobs. In a special session last fall, Connecticut’s Legislature made changes to its tax code that both parties agreed were necessary to help our business community. Because of this, employers can continue their strong pace of hiring and investing in the new innovative economy that will drive us into the future. Connecticut’s community colleges and regents system has answered the challenge for precision manufacturing training. The University of Connecticut has increased its engineering school capacity by fifty percent, helping meet the demand for technology and manufacturing job openings across Connecticut. The Manufacturing Innovation Fund (MIF) has launched two new programs geared specifically to training. One of those programs has already assisted 88 companies in training their workforce. Connecticut’s public school teachers are working hard as well. Test scores are up; graduation rates have increased; and we’re closing in on the achievement gap every year. Housing is more affordable; last year alone Connecticut funded more than 11,000 units of housing. Connecticut is the first state in the nation to end chronic veteran homelessness and this year will end chronic homelessness for everyone. And lastly, crime in Connecticut is at a 48-year low. Violent crime is down again from the previous year; the prison population has reached new lows and this year Connecticut closed its fourth prison.

A Detailed Look at Connecticut’s Recovery Connecticut’s economic recovery has been progressing slower than the nation, but faster than some of its neighboring states. The low point of Connecticut’s recession was in February 2010, but only recently has the state come close to the employment levels it experienced prior to the recession. As of July 2015, it has been 65 months into recovery. A year-by-year breakdown of growth in nonfarm employment since the trough is detailed below. This gives us a better idea of how each industry has shaped the state’s current situation. There is a further discussion of where each industry was at during each year of the recovery. The first year of recovery started out strong with an increase of 17,100 jobs. The momentum has been slowly tapering off with each year into recovery. From 2013 to 2014, Connecticut added 12,500 nonfarm jobs, a growth rate of .8%. Four of the major industries have provided steady growth year-over-year throughout the recovery. Leisure and hospitality has had the largest yearly average percentage
increase at 3%, while professional and business services has had the largest average of jobs added each year at 5,300. The education and health services industry has experienced an average of 4,500 added each year of the recovery. Trade, transportation, and utilities is the other sector that has shown consistent growth year-over-year. Meanwhile, two industries have been a drag on the current recovery. The employment levels in financial activities and government have been decreasing year-over-year. Government started in 2010 to 2011 with its largest drop of 3,900 jobs and has been slowing down its job losses with only 400 from 2013 to 2014. Local government is the largest subsector of government and includes Indian tribal employment. Financial activities are showing an opposite trend. The sector only lost 200 jobs the initial year of recovery, but the most recent year-over-year figure shows it lost 2,100 jobs. Data from the Bureau of Labor Statistics Current Employment Statistics shows employment levels, change, and employment growth rates for the major sectors in the Connecticut economy. The Construction, Natural Resources, and Mining sector had employment of 50,600 in 2010, the trough year of the recession. This increased to 52,100 in 2011, 52,200 in 2012, 54,300 in 2013 and 56,100 in 2014. The 2010 to 2011 change was 1,500, for 2011 to 2012 the change was 100, for 2012 to 2013 the change was 2,100 and for 2013 to 2014 the change was 1,800 representing growth rates of 3.0%, 0.2%, 4.0% and 3.3% respectively. The Manufacturing sector had employment of 164,800 in 2010, the trough year of the recession. This increased to 165,500 in 2011, 164,200 in 2012, 162,600 in 2013 and 159,700 in 2014. The 2010 to 2011 change was 700, for 2011 to 2012 the change was -1,300, for 2012 to 2013 the change was -1,600 and for 2013 to 2014 the change was -2,900 representing growth rates of 0.4%, -0.8%, -1.0% and -1.8% respectively. The Trade, Transportation and Utilities sector had employment of 289,800 in 2010, the trough year of the recession. This increased to 292,900 in 2011, 295,800 in 2012, 298,400 in 2013 and 301,300 in 2014. The 2010 to 2011 change was 3,100, for 2011 to 2012 the change was 2,900, for 2012 to 2013 the change was 2,600 and for 2013 to 2014 the change was 2,800 representing growth rates of 1.1%, 1.0%, 0.9% and 0.9% respectively. The Information sector had employment of 31,700 in 2010, the trough year of the recession. This fell to 31,300 in 2011, 31,300 in 2012, 32,100 in 2013 and 31,800 in 2014. The 2010 to 2011 change was -400, for 2011 to 2012 the change was 0, for 2012 to 2013 the change was 800 and for 2013 to 2014 the change was -300 representing growth rates of -1.4%, -0.1%, 2.7% and -0.8% respectively. The finance and insurance sector had employment of 116,300 in 2010, the trough year of the recession. This increased to 116,400 in 2011, 114,400 in 2012, 111,800 in 2013 and 109,400 in 2014. The 2010 to 2011 change was 100, for 2011 to 2012 the change was -2,000, for 2012 to 2013 the change was -2,600 and for 2013 to 2014 the change was -2,400 representing growth rates of -1.7%, -2.3% and -2.1% respectively. The real estate and rental and leasing sector had employment of 18,900 in 2010, the trough year of the recession. This decreased to 18,700 in 2011, 18,800 in 2012, 19,000 in 2013 and 19,300 in 2014. The 2010 to 2011 change was -200, for 2011 to 2012 the change was 100, for 2012 to 2013 the change was -200 and for 2013 to 2014 the change was 300 representing growth rates of -1.1%, 0.5%, 1.1% and -1.6% respectively. The professional and business services sector had employment of 190,700 in 2010, the trough year of the recession. This increased to 197,100 in 2011, 203,200 in 2012, 206,600 in 2013 and 211,800 in 2014. The 2010 to 2011 change was 6,400, for 2011 to 2012 the change was -6,100, for 2012 to 2013 the change was -3,400 and for 2013 to 2014 the change was 5,200 representing growth rates of 3.3%, 3.1%, 1.7% and 2.5% respectively. The Educational Services sector had employment of 59,200 in 2010, the trough year of the recession. This increased to 60,900 in 2011, 61,600 in 2012, 62,200 in 2013 and 63,500 in 2014. The 2010 to 2011 change was 1,700, for 2011 to 2012 the change was 700, for 2012 to 2013 the change was 600 and for 2013 to 2014 the change was 1,300 representing growth rates of 2.9%, 1.1%, 1.0% and 2.1% respectively. The Health Care and Social Assistance sector had employment of 247,700 in 2010, the trough year of the recession. This increased to 252,400 in 2011, 256,000 in 2012, 259,000 in 2013 and 261,500 in 2014. The 2010 to 2011 change was 4,700, for 2011 to 2012 the change was 3,600, for 2012 to 2013 the change was 3,000 and for 2013 to 2014 the change was 2,500 representing growth rates of 1.9%, 1.4%, 1.2% and 1.0% respectively. The Leisure and Hospitality
sector had employment of 133,600 in 2010, the trough year of the recession. This increased to 137,300 in 2011, 142,600 in 2012, 147,300 in 2013 and 151,000 in 2014. The 2010 to 2011 change was 3,700, for 2011 to 2012 the change was 5,300, for 2012 to 2013 the change was 4,700 and for 2013 to 2014 the change was 3,700 representing growth rates of 2.8%, 3.9%, 3.3% and 2.5% respectively. The Other Services sector had employment of 60,500 in 2010, the trough year of the recession. This fell to 60,400 in 2011, 61,700 in 2012, 62,200 in 2013 and 63,000 in 2014. The 2010 to 2011 change was -200, for 2011 to 2012 the change was 1,300, for 2012 to 2013 the change was 500 and for 2013 to 2014 the change was 800 representing growth rates of -0.3%, 2.2%, 0.9% and 1.2% respectively. Federal Government employment was 19,700 in 2010, the trough year of the recession. This fell to 18,000 in 2011, 17,600 in 2012, 17,300 in 2013 and 17,400 in 2014. The 2010 to 2011 change was -1,700, for 2011 to 2012 the change was -400, for 2012 to 2013 the change was -300 and for 2013 to 2014 the change was 100 representing growth rates of -8.6%, -2.2%, -1.7% and 0.6% respectively. State Government employment was 67,400 in 2010, the trough year of the recession. This fell to 67,200 in 2011, 66,800 in 2012, 66,900 in 2013 and 67,000 in 2014. The 2010 to 2011 change was -200, for 2011 to 2012 the change was -400, for 2012 to 2013 the change was 100 and for 2013 to 2014 the change was -600 representing growth rates of -0.3%, -0.6%, 0.1% and 0.1% respectively. Local Government employment includes Indian tribal government employment. Connecticut Nonfarm Employment has added fewer jobs each year since the recession with jobs up 17,100 from 2010 to 2011, up 15,300 from 2011 to 2012, up 13,200 from 2012 to 2013 and up 12,500 from 2013 to 2014. Professional and Business Services added the most jobs from 2010 to 2011, 2011 to 2012 and 2013 to 2014. Leisure and Hospitality added the most jobs from 2012 to 2013. Government had the largest drop from 2010 to 2011 and from 2011 to 2012 falling 3,900 and 1,800 respectively. Financial Activities fell the most from 2012 to 2013 and from 2013 to 2014, down 2,600 and 2,100 respectively.

(ii) Emerging Demand Industry Sectors and Occupations – Provide an analysis of the industries and occupations for which demand is emerging.

Industry Employment Projections Short-Term The current short-term projections developed by the Department of Labor’s Office of Research are for the two-year period from the third quarter of 2014 to the third quarter of 2016 are detailed below. Connecticut is expected to continue on its rebound from the recent recession over the period. The average annual growth rate is expected to be 0.7%. This will potentially bring the employment level to 1,823,049 by the third quarter of 2016. The goods producing industries are expected to contract at an annual average rate of 0.6%. The largest contributor to this is the manufacturing industry. Over the two-year period, it is expected to drop by 5,454 jobs. Construction has a brighter outlook, as it is projected to grow on average 2.2% annually. The much larger service providing industries are forecasted to grow 0.9% on an annual average basis. Service providing industries make up a large share of Connecticut’s employment. The projected growth is largely aided by education and health services. The industry is expected to grow 1.4% annually, keeping with recent trends. Other significant contributions to the anticipated employment growth are the trade, transportation, and utilities, professional and business services, and leisure and hospitality sectors. Information, financial activities, and government are all likely to shrink over the next two years.

According to the Short Term Projections, total employment for all Industries will grow from 1,799,082 in 2014 to 1,823,049 in 2016, a growth rate of 0.7%. For Goods Producing industries, employment
will fall from 226,341 in 2014 to 223,520 in 2016, a decline of 0.6%. For Natural Resources and Mining employment will increase from 7,098 in 2014 to 7,100 in 2016, a growth rate of 0.0%. Construction employment is projected to grow from 59,611 in 2014 to 62,242 in 2016, a growth rate of 2.2%. Manufacturing jobs are projected to decrease from 159,632 in 2014 to 154,178 in 2016, a decline of -1.7%. Service Providing industries are projected to increase from 1,455,087 in 2014 to 1,481,366 in 2016, a 0.9% increase. Trade, Transportation, and Utilities jobs are expected to increase from 296,252 in 2014 to 299,374 in 2016, a 0.5% increase. The information sector is expected to lose jobs, falling from 32,050 in 2014 to 31,959 in 2016, a 0.1% drop. Financial Activities are projected to decline from 129,566 in 2014 to 128,322 in 2016, a 0.5% fall. Professional and Business Services will increase from 214,718 in 2014 to 220,389 in 2016 for a gain of 1.3%. Education and Health Services are projected to grow from 446,494 in 2014 to 458,814 in 2016, a 1.4% rise. Leisure and Hospitality is projected to gain from 171,027 in 2014 to 177,329 in 2016, a 1.8% gain. Other Services (except Government) will go from 76,000 in 2014 to 76,419 in 2016, a 0.3% increase. Government jobs are expected to rise from 88,980 in 2014 to 88,760 in 2016, a -0.1% decline. The composition of Connecticut 2016 projected employment is 81% Service Producing, 12% Goods Producing, and 7% Self Employed and Unpaid Family Workers. Occupational Employment Forecast Short-Term Connecticut’s occupational employment is expected to grow by 23,967 jobs over the 2014-2016 projections period. These projections are detailed below by major occupational category. The major categories with the largest employment change are food preparation and serving related, education, training, and library, personal care and service, and building and grounds cleaning and maintenance occupations. There are also lists of the fastest growing and shrinking occupations based on the minor occupation group. Total Occupational Employment was 1,799,082 in 2014 and projected to increase to 1,823,049 in 2016, an increase of 23,967. Management occupations were 135,313 in 2014 and projected to grow to 136,335 in 2016, an increase of 1,022. Business and Financial Operations occupations were 94,899 in 2014 and projected to grow to 95,431 in 2016, an increase of 532. Computer and Mathematical occupations were 47,516 in 2014 and projected to grow to 49,165 in 2016, an increase of 1,649. Architecture and Engineering occupations were 33,787 in 2014 and fell to 33,458 in 2016 a decline of -329. Life, Physical, and Social Science occupations were 13,203 in 2014 and projected to rise to 13,335 in 2016 for a gain of 132. Community and Social Service occupations were 37,911 in 2014 and projected at 38,915 in 2016, a gain of 1,004. Legal occupations were at 15,242 in 2014 and projected at 15,301 in 2016 for a 0.4% rise. Education, Training, and Library occupations were at 119,293 in 2014 and rose to 123,402 in 2016 for a gain of 4,109. Arts, Design, Entertainment, Sports, and Media occupations were at 36,917 in 2014 and projected to rise to 37,196 in 2016 for an increase of 279. Healthcare Practitioners and Technical occupations were at 105,660 in 2014 and projected to rise to 107,205 in 2016 for an increase of 1,545. Healthcare Support occupations were at 53,490 in 2014 and projected to rise to 54,316 in 2016 for an increase of 826. Protective Service occupations were at 35,456 in 2014 and projected to rise to 35,855 in 2016 for an increase of 399. Food Preparation and Serving Related occupations were at 139,510 in 2014 and projected to rise to 144,188 in 2016 for an increase of 4,678. Building and Grounds Cleaning and Maintenance occupations were at 76,989 in 2014 and projected to rise to 79,210 in 2016 for an increase of 2,221. Personal Care and Service occupations were 92,842 in 2014 and projected at 96,497 for 2016 for an increase of 3,655. Sales and Related occupations were at 179,960 in 2014 projected to rise to 180,415 in 2016 for an increase of 455. Office and Administrative Support occupations were 268,983 in 2014 projected to rise to 269,054 for an increase of 71. Farming, Fishing, and Forestry occupations were 4,676 in 2014 projected to fall to 4,675 in 2016 for a decrease of 1. Employment in Construction and Extraction occupations was 58,810 in 2014, increasing to a projected 60,639 in 2016 for an increase of 1,829. Installation, Maintenance, and Repair occupations were 56,814 in 2014 and projected to increase to 57,188 in 2016 for an increase of 374. Production occupations had employment of 96,922 in 2014 projected to fall to 94,801 in 2016 for a decrease of 2,121.
Transportation and Material Moving occupations were at 94,889 in 2014 and were projected to rise to 96,468 in 2016 for an increase of 1,579.

The fastest growing occupations (by minor occupation group) are Water Transportation Workers which increase from 870 in 2014 to a projected 1,014 in 2016, a 16.6% increase. Helpers, Construction Trades which were 1,384 in 2014 and a projected 1,461 in 2016 for a 5.6% increase. Postsecondary Teachers which were 32,000 in 2014 and a projected 33,614 in 2016, an increase of 5.0%. Other Personal Care and Service Workers had employment of 59,223 in 2014 and projected 62,163 in 2016 for a rise of 5.0%. Occupational Therapy and Physical Therapist Assistants and Aides had 2014 employment of 1,761 which rose to a projected 1,836 in 2016 for a 4.3% rise. Entertainment Attendants and Related Workers had employment of 6,753 in 2014 projected to rise to 7,020 in 2016 for a 4.0% increase. Supervisors of Food Preparation and Serving Workers had employment of 11,418 in 2014 which rose to a projected 11,857 in 2016 for an increase of 3.8%. Computer Occupations had employment of 44,775 in 2014 which rose to a projected 46,356 in 2016 a 3.5% rise. Food and Beverage Serving Workers had employment of 75,408 in 2014 and a projected 78,069 in 2016 for an increase of 3.5% Preschool, Primary, Secondary, and Special Education School Teachers had employment of 48,094 in 2014 which rose to 49,640 in 2016 (projected) for a 3.2% rise. The occupations (by minor occupation group) that shrank the fastest were Printing Worker which had employment of 2,982 in 2014 which fell to a projected 2,722 in 2016 for an 8.7% decline. Communications Equipment Operators drop from 1,589 in 2014 to a projected 1,532 in 2016 for a 3.6% drop. Supervisors of Production Workers fell from 8,081 in 2014 to a projected 7,851 in 2016 for a 2.9% decline. Plant and System Operators declined from 2,415 in 2014 to 2,355 in 2016 (projected) a 2.5% drop. Other Production Occupations fell from 23,595 in 2014 to a projected 23,023 in 2016 a 2.4% drop. Religious Workers fell from 2,848 in 2014 to a projected 2,784 in 2016, a 2.3% decline. Assemblers and Fabricators fell from 21,198 in 2014 to 20,744 in 2016 a 2.1% decline. Drafters, Engineering Technicians, and Mapping Technicians declined from 8,578 in 2014 to 8,396 in 2016, a 2.1% decline. Metal Workers and Plastic Workers fell from 28,398 in 2014 to 27,798 projected for 2016 a 2.1% drop. Material Recording, Scheduling, Dispatching, and Distributing Workers declined from 42,513 in 2014 to a projected 41,984 in 2016, a decline of 1.2%.

Ten-Year Projections Every two years, the Connecticut Department of Labor prepares ten-year projections of employment by industry and occupation. The current projections are for the 2012-2022 period. The projections are prepared using national projections produced by the U.S. Bureau of Labor Statistics. The projections are based on the assumption of a full employment economy at the end of the projections period (2022). Industry The largest sector, and the one expected to add the most jobs over the next ten years, is Health Care. Driven by the aging population employment is projected to growth by nearly 40,000 jobs by 2022. Most of that growth is expected to be in Ambulatory Care settings – offices of practitioners and outpatient centers. Home health care services are also expected to add employment. Hospitals and Assisted Living Facilities are expected to grow but employment at Skilled Nursing Facilities (nursing homes) is expected to remain flat. Educational Services is projected to add almost 18,000 jobs over the next ten years, the second largest sector in terms of job growth as elementary and secondary schools, colleges and universities (public and private) are expected to add employment. This is a smaller increase than experienced over the past 10 years driven by slower projected growth in school-aged population. Close behind education and in a turnaround from the previous ten years, Professional, Scientific, and Technical Services are projected to add 17,500 jobs over the next ten years with the largest gain in the Computer Systems Design industry. Similar to the national projections, Management Consulting, Accounting, and Architectural and Engineering Services are projected to grow strongly. Most other sectors are expected to add jobs over the next ten years. For example, Construction is expected to add over 11,000 jobs after a similar decline over the past decade with all major industries within the sector expected to grow strongly. In another major turnaround, Manufacturing is projected to add jobs. While the growth is less than 1% over 10 years, this follows a decline of over 40,000 jobs over
the prior decade. Growth is uneven – with some manufacturing industries growing while others contract. Two sectors that are expected to decline over the next ten years are Information and Arts, Entertainment & Recreation, although the declines will be significantly smaller in the next ten years than over the prior ten. Newspaper publishing is the main reason for the information decline while increased competition in other states for Connecticut’s casino business will cause declines in the Entertainment sector. Occupations Consistent with the industry projections, the largest increases in employment are projected to be in Healthcare, Education and Personal Care categories. Registered Nurses, Physical Therapists, Home Health Aids, Personal Care Aides and teachers at all levels are all projected to grow significantly over the next ten years. Office and Administrative Support, Management, Food Preparation & Serving, Business & Financial Operations, Construction & Extraction, and Sales occupations are all expected to add thousands of jobs over the next ten years.

(iii) Employers’ Employment Needs- With regard to the industry sectors and occupations identified in (1) and (2), provide an assessment of the employment needs of employers, including description of knowledge, skills and abilities required, including credentials and licenses. In addition to growth, the projections include estimates of openings due to replacement needs as workers retire or move on to new occupations. The occupations with most openings (Retail Salespersons, Cashiers, Waiters & Waitresses, Food Prep &Serving workers) are those with high replacements needs. While some workers make their careers in these occupations, for many these are held for a few years before the worker moves on. Interestingly, the growth in demand for health care workers is such that Registered Nurses, a career-oriented occupation, is fifth in terms of total openings. Education and Training Each occupation is assigned a minimum education category based on our best knowledge of the minimum education required to enter the occupation. Particular jobs within an occupation may have different requirements but in most cases these requirements will be at or above the minimum for the occupation. In addition some occupations require work experience in a related occupation. Finally, some additional on-the-job training, an apprenticeship or an internship might be required to become proficient in the occupation. The projections show significant growth in many occupations that require a college or even a professional or advanced degree in fields from health care, education, finance, and information technology in addition to the need to replace many of these workers who will be retiring over the next decade. Occupations with a minimum education requirement beyond high school and less than a Bachelor’s Degree, or those requiring a high school diploma plus an apprenticeship, internship, or moderate or long-term on-the-job training are classified as “Middle Skill” occupations. The largest occupation in the “middle skill” category is registered nurse because it’s possible to become a registered nurse without a Bachelor’s Degree (although many jobs within the nursing field may require a Bachelor’s). Other middle skill occupations projected to grow over the next ten years cover a wide variety of fields in industries ranging from health care to education to construction to transportation. Less growth is expected in occupations that require only a high school diploma although there will be some growth in child care, security, and clerical occupations. Finally there will be growth in occupations that don’t necessarily require a high school diploma to enter the occupation, such as Personal Care Aides, Retail Sales Clerk, or Waiter or Waitress. However, any particular job within an occupation may have additional requirements. An individual employer, for example, may decide to require a high school diploma or another credential for a particular position even if minimum to enter the occupation is lower.

Education and Wages The projections suggest that education will remain valuable over the next ten years. While we are projecting thousands of annual openings in occupations that with a minimum education of less than a high school diploma, the current median wage for these occupations is less than $30,000 per year (assuming full-year full-time work). On the other hand, most of the openings in high-paying occupations (those with a current median annual wage of $75,000 or more) require a college degree or even a professional or advanced degree. As detailed below, the number of annual growth openings projected for occupations by current median annual wage and minimum education and training requirements. The chart shows that there will be opportunities for workers in low-skill
low-paying jobs to increase their incomes by gaining a credential and entering a “Middle Skill” occupation while those who are able to graduate from college will greatly increase their chances of a high-paying career. According to the 2012-2022 long term projections, there will be 3,877 annual growth openings in occupations with a median wage under $30,000 per year requiring less than a high school diploma to enter the occupation; 289 annual growth openings in occupations with a median wage between $30,000 and 59,000 per year requiring less than a high school diploma to enter the occupation; 8 annual growth openings in occupations with a median wage between $60,000 and 74,000 per year requiring less than a high school diploma to enter the occupation; 4 annual growth openings in occupations with a median wage of $75,000 or more per year requiring less than a high school diploma to enter the occupation; 618 annual growth openings in occupations with a median wage under $30,000 per year requiring a high school diploma or GED to enter the occupation; 1,562 annual growth openings in occupations with a median wage between $30,000 and 59,000 per year requiring a high school diploma or GED to enter the occupation; 351 annual growth openings in occupations with a median wage between $30,000 and 59,000 per year requiring education or training in the middle skill category to enter the occupation; 3,914 in occupations with a median wage between $30,000 and 59,000 per year requiring education or training in the middle skill category to enter the occupation; 558 annual growth openings in occupations with a median wage between $60,000 and 74,000 per year requiring education or training in the middle skill category to enter the occupation; 3,623 annual growth openings in occupations with a median wage of $75,000 or more per year requiring a bachelor’s degree and/or an advanced or professional degree to enter the occupation.

B. WORKFORCE ANALYSIS

The Unified or Combined State Plan must include an analysis of the current workforce, including individuals with barriers to employment, as defined in section 3 of WIOA.* This population must include individuals with disabilities among other groups** in the State and across regions identified by the State. This includes: Individuals with barriers to employment include displaced homemakers; low-income individuals; Indians, Alaska Natives, and Native Hawaiians; individuals with disabilities, including youth who are individuals with disabilities; older individuals; ex-offenders; homeless individuals, or homeless children and youths; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; farmworkers (as defined at section 167(i) of WIOA and Training and Employment Guidance Letter No. 35-14); individuals within 2 years of exhausting lifetime eligibility under the Temporary Assistance for Needy Families program; single parents.
(including single pregnant women); and long-term unemployed individuals. **Veterans, unemployed workers, and youth, and others that the State may identify.

I. EMPLOYMENT AND UNEMPLOYMENT

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

II. LABOR MARKET TRENDS

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

III. EDUCATION AND SKILL LEVELS OF THE WORKFORCE

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

IV. SKILL GAPS

Describe apparent ‘skill gaps’.

(B) Workforce Analysis: Unified State Plan must include an analysis of the current workforce, including individuals with barriers to employment. This population must include individuals with disabilities among other groups in CT and State-identified regions.

i. Employment and Unemployment – Provide an analysis of the industries and occupations for which there is existing demand. Connecticut’s Recovering Labor Market Connecticut is now into its fifth year of recovery from the “great recession” that took its toll on the state from 2008 to 2010. Over the recession, Connecticut lost over 5% of its nonfarm employment, roughly 119,000 jobs based on the monthly current employment statistics from March 2008 to February 2010. The largest losses came from the construction, manufacturing, trade, transportation and utilities, and the professional and business services sectors. Those four sectors alone accounted for 79% of the lost jobs. The lone sectors that were able to create jobs during the recession were education, which posted a small gain, and health care and social assistance, which continued to add jobs during the recession. As of August 2015, Connecticut has yet to regain all of the nonfarm employment it lost in the recession. The 104,900 gain since February 2010 is 88% of the decline. All industry super sectors, except for manufacturing, financial activities and government, have added jobs since the recovery began. Manufacturing has dropped 2,400 jobs since February 2010, bringing the total loss to 27,300 jobs since the recession hit in March 2008. The financial activities sector has lost 6,600 jobs since the trough year, making a total loss of 14,800 jobs since the peak. Similarly, government has lost 6,300 jobs since the trough, creating a drop of 14,600 jobs since the peak. Only three super sectors have been able to reach or exceed their 2008 level. The professional and business services sector lost 14,800 jobs during the recession, but has since gained 21,100 jobs to bring it 6,300 jobs higher than in 2008. Leisure and hospitality took a small dip of 3,800 jobs from 2008 to 2010, but is now 13,600 jobs greater than it was pre-recession. The sector that has grown the most in recent years is not surprisingly the one that didn’t lose jobs during the recession- education and health services. Education and health services grew 10,100 jobs when the rest of the economy was in a downfall, and has grown by another 18,100 since 2010. As detailed below, the annual averages of Connecticut nonfarm employment throughout the current cycle. The details compare the employment levels from the peak, trough and most recent complete year of data and also show the
change in jobs from the peak to trough, trough to recent year, and peak to recent year. We then highlight the major industry sectors and show how the job share of each has shifted throughout the cycle. Nonfarm Employment through the Current Cycle had a peak year of 2008, a low year in 2010, while 2014 is a recent year. Total nonfarm employment was 1,699,000 in 2008 (the peak year) fell to 1,608,000 in 2010 (the low year) and rose to 1,666,100 in 2014 (the recent year). The change in jobs from 2008 to 2010 was down 91,000, from 2010 to 2014 was up 58,100 and from 2008 to 2014 was down 32,900. Total private employment was 1,446,500 in 2008, 1,363,800 in 2010, and 1,428,200 in 2014. The change from 2008 to 2010 was down 82,700, from 2008 to 2014 was down 64,400, and from 2008 to 2014 was down 18,300. For goods producing industries, employment was 252,700 in 2008, 215,400 in 2010, and 215,800 in 2014. The change from 2008 to 2010 was down 37,300, from 2010 to 2014 was up 400, and from 2008 to 2014 was down 36,900. For construction, natural resources, and mining, employment was 66,100 in 2008, 50,600 in 2010, and 56,100 in 2014. The change from 2008 to 2010 was down 15,500, from 2010 to 2014 was up 5,500, and from 2008 to 2014 was down 10,000. For manufacturing, there were 186,700 jobs in 2008, 164,800 in 2010, 159,700 in 2014 for declines of 21,900 from 2008 to 2010, 5,100 from 2010 to 2014 and 27,000 from 2008 to 2014. Durable Goods manufacturing had 143,500 jobs in 2008, 127,300 in 2010 and 124,200 in 2014 for declines of 16,200 from 2008 to 2010, 3,000 from 2010 to 2014 and 19,100 from 2008 to 2014. Fabricated Metal manufacturing had 33,100 jobs in 2008, 28,100 in 2010, and 29,800 in 2014 for a 5,000 decline from 2008 to 2010, a rise of 1,700 from 2010 to 2014 but a decline of 3,300 from 2008 to 2014. Machinery manufacturing had 17,700 jobs in 2008, 15,000 in 2010 and 13,900 in 2014 for declines of 2,700 from 2008 to 2010, 1,100 from 2010 to 2014 and 3,800 from 2008 to 2014. Service providing industries had 1,446,300 jobs in 2008, 1,392,600 in 2010 and 1,450,300 in 2014 for declines of 53,700 from 2008 to 2010, an increase of 57,700 from 2010 to 2014 for an increase of 4,000 from 2008 to 2014. Trade, transportation, and utilities had 309,900 jobs in 2008, 293,800 in 2010 and 301,300 in 2014 for a decline of 20,100 from 2008 to 2010, an increase of 11,500 for a decline of 8,600 from 2008 to 2014. Wholesale Trade had 69,200 jobs in 2008, 62,700 in 2010 and 63,000 in 2014 for a decline of 6,500 from 2008 to 2010, an increase of 9,900 from 2010 to 2014 for a decline of 2,500 from 2008 to 2014. Motor Vehicle and Parts Dealers had employment of 21,200 in 2008, 19,200 in 2010, and 20,900 in 2014 for a decline of 2,000 from 2008 to 2010, a gain of 1,700 from 2010 to 2014 for a loss of -300 from 2008 to 2014. Building Material stores had a employment of 15,600 in 2008 falling to 14,100 in 2010 and rising to 15,300 in 2014 for a drop of 1,500 from 2008 to 2010, a rise of 1,200 from 2010 to 2014 for a loss of -300 from 2008 to 2014. Food and Beverage Stores had employment of 41,700 in 2008 which rose to 42,100 in 2010 and 44,700 in 2014 for a gain of 400 from 2008 to 2010, 2,600 from 2010 to 2014 and 3,000 from 2008 to 2014. General Merchandise Stores had employment of 27,100 in 2008, 27,500 in 2010 and 26,800 in 2014 for gains of 400 from 2008 to 2010, 1,100 from 2010 to 2014 and 1,500 from 2010 to 2014. Transportation, Warehousing, & Utilities had employment of 52,700 in 2008, 48,900 in 2010 and 52,600 in 2014 for a loss of -800 from 2008 to 2010, a gain of 3,700 from 2010 to 2014 and a loss of -100 from 2008 to 2014. Utilities averaged 8,700 jobs in 2008, 7,900
Places had 100,900 job 2008, 99,200 in 2010 and 112,700 in 2014 for a drop of 1,700 from 2008 to 2010 and gains of 13,500 from 2010 to 2014 and 11,800 from 2008 to 2014. Other Services had 63,100 jobs in 2008, 60,500 in 2010, and 63,000 in 2014 for a drop of 2,600 from 2008 to 2010, a gain of 2,500 from 2010 to 2014 and drop of 100 from 2008 to 2014. Government had 252,500 jobs in 2008, 244,200 in 2010 and 237,900 in 2014 for declines of 8,300 from 2008 to 2010, 6,300 from 2010 to 2014, and 14,600 from 2008 to 2014. Federal Government jobs were at 19,500 in 2008, 19,700 in 2010, and 17,400 in 2014 for an increase of 200 from 2008 to 2010, and declines of 2,300 from 2010 to 2014 and 2,100 from 2008 to 2014. State Government jobs were 70,200 in 2008, 67,400 in 2010 and 67,000 in 2014 for declines of 2,800 from 2008 to 2010, 400 from 2010 to 2014 and 3,200 from 2008 to 2014. Local Government jobs were 162,800 in 2008, 157,100 in 2010 and 153,400 in 2014 for declines of 5,700 from 2008 to 2010, 3,700 from 2010 to 2014 and 9,400 from 2008 to 2014. Local government includes Native American tribal government employment. In terms of employment share, Goods Producing industries were 14.9% of employment in 2008, 13.4% in 2010 and 13.0% in 2014 so the share fell 1.5% points from 2008 to 2010, 0.4% points from 2010 to 2014 and 1.9% points from 2008 to 2014. Trade, Transportation, and Utilities was 18.2% of total employment in 2008, 18.0% in 2010 and 18.1% in 2014 so the share fell 0.2% points from 2008 to 2010, rose 0.1% points from 2010 to 2014 but fell 0.2% points from 2008 to 2014. Information was 2.2% of total employment in 2008, 2.0% in 2010 and 1.9% in 2014 so the share fell 0.2% points from 2008 to 2010, 0.1% points from 2010 to 2014, and 0.3% points from 2008 to 2014. Financial Activities was 8.4% of total employment in 2008, 8.4% in 2010 and 7.7% in 2014, so the share was unchanged from 2008 to 2010 and fell 0.7% points from 2010 to 2014 and from 2008 to 2014. Professional and Business Services was 12.1% of total employment in 2008, 11.9% in 2010 and 12.7% in 2014 so the share fell 0.2% points from 2008 to 2010, rose 0.8% points from 2010 to 2014 and rose 0.6% points from 2008 to 2014. Education and Health Services employment was 17.5% of total employment in 2008, 19.1% in 2010 and 19.5% in 2014 rising 1.6% points from 2008 to 2010, 0.4% points from 2010 to 2014 and 2.0% points from 2008 to 2014. Leisure and Hospitality was 8.1% of total employment in 2008, 8.3% in 2010 and 9.1% in 2014 rising 0.2% points from 2008 to 2010, 0.8% points from 2010 to 2014 and 1.0% points from 2008 to 2014. Other Services jobs were 3.7% of total jobs in 2008, 3.8% in 2010 and 3.8% in 2014, increasing 0.1% points from 2008 to 2010, 0.0% points from 2010 to 2014, and 0.1% points from 2008 to 2014. Government jobs were 14.9% of total jobs in 2008, 15.2% in 2010 and 14.3% in 2014, increasing 0.3% points from 2008 to 2010, and decreasing 0.9% points from 2010 to 2014 and 0.6% points from 2008 to 2014.

(ii) Labor Market Trends- Provide an analysis of key labor market trends, including across existing industries and occupations. As detailed below, the labor market has shifted throughout the past recession and recovery. Starting with the industries that lost the most jobs from 2008 to 2010 and ending with the industries that gained the most jobs during that period, Manufacturing lost 24,310 jobs from 2008 to 2010 and lost 7,263 from 2010 to 2014 leaving employment at 159,353. Construction lost 19,335 jobs from 2008 to 2010 and gained 6,036 from 2010 to 2014 leaving employment at 62,451. Retail Trade lost 15,093 jobs from 2008 to 2010 and gained 5,501 from 2010 to 2014 leaving employment at 159,353. Admin & Support Services lost 14,018 jobs from 2008 to 2010 and gained 7,263 from 2010 to 2014 leaving employment at 159,353. Prof. & Tech. Services lost 9,023 jobs from 2008 to 2010 and gained 9,023 from 2010 to 2014 leaving employment at 96,434. Wholesale lost 7,531 jobs from 2008 to 2010 and lost 59 from 2010 to 2014 leaving employment at 63,278. Finance & Insurance lost 7,448 jobs from 2008 to 2010 and gained 7,563 from 2010 to 2014 leaving employment at 107,774. Information lost 6,235 jobs from 2008 to 2010 and gained 421 from 2010 to 2014 leaving employment at 35,175. Accommodation & Food lost 5,931 jobs from 2008 to 2010 and gained 12,212 from 2010 to 2014 leaving employment at 124,529. Transportation lost 4,855 jobs from 2008 to 2010 and gained 3,515 from 2010 to 2014 leaving employment at 53,282. Other Services lost 2,902 jobs from 2008 to 2010 and gained 3,426 from 2010 to 2014 leaving employment at 60,845. Arts, Entertainment, & Recreation lost 2,846 jobs from
2008 to 2010 and lost 983 from 2010 to 2014 leaving employment at 43,744. Government excluding education, hospitals, and casinos lost 2,536 jobs from 2008 to 2010 and gained 846 from 2010 to 2014 leaving employment at 59,015. Real Estate lost 2,060 jobs from 2008 to 2010 and gained 184 from 2010 to 2014 leaving employment at 19,961. Utilities lost 280 jobs from 2008 to 2010 and lost 606 from 2010 to 2014 leaving employment at 8,015. Management of Companies lost 164 jobs from 2008 to 2010 and gained 817 from 2010 to 2014 leaving employment at 43,744. Agriculture lost 161 jobs from 2008 to 2010 and lost 3 from 2010 to 2014 leaving employment at 578. Public and Private Educational Services gained 115 jobs from 2008 to 2010 and gained 289 from 2010 to 2014 leaving employment at 181,057. Social Assistance gained 2,149 jobs from 2008 to 2010 and gained 7,501 from 2010 to 2014 leaving employment at 59,406. Health Care gained 4,246 jobs from 2008 to 2010 and gained 5,905 from 2010 to 2014 leaving employment at 223,809. Detailed next are the employment growth throughout the current recovery and the industry’s average annual wage. Starting with the industries that lost the most jobs from 2010 to 2014 and ending with those that added the most jobs during that period, Finance & Insurance lost 7,563 jobs from 2010 to 2014 and has average annual wages of $155,999 and average employment of 107,774. Manufacturing lost 7,263 jobs from 2010 to 2014 and has average annual wages of $87,667 and average employment of 159,353. Arts, Entertainment, and Recreation lost 983 jobs from 2010 to 2014 and has average annual wages of $33,720 and average employment of 43,744. Utilities lost 606 jobs from 2010 to 2014 and has average annual wages of $106,493 and average employment of 8,015. Wholesale Trade lost 59 jobs from 2010 to 2014 and has average annual wages of $82,772 and average employment of 578. Real Estate gained 184 jobs from 2010 to 2014 and has average annual wages of $67,559 and average employment of 19,961. Public and Private Educational Services gained 289 jobs from 2010 to 2014 and has average annual wages of $57,664 and average employment of 181,057. Information gained 421 jobs from 2010 to 2014 and has average annual wages of $94,705 and average employment of 35,175. Agriculture gained 817 jobs from 2010 to 2014 and has average annual wages of $32,119 and average employment of 4,994. Government gained 846 jobs from 2010 to 2014 and has average annual wages of $72,013 and average employment of 59,015. Other Services gained 3,426 jobs from 2010 to 2014 and has average annual wages of $34,022 and average employment of 60,845. Transportation gained 3,515 jobs from 2010 to 2014 and has average annual wages of $50,275 and average employment of 53,282. Management of Companies gained 3,864 jobs from 2010 to 2014 and has average annual wages of $155,677 and average employment of 31,554. Retail Trade gained 5,501 jobs from 2010 to 2014 and has average annual wages of $33,083 and average employment of 190,430. Health Care gained 5,905 jobs from 2010 to 2014 and has average annual wages of $57,063 and average employment of 223,809. Construction gained 6,036 jobs from 2010 to 2014 and has average annual wages of $68,292 and average employment of 62,451. Social Assistance gained 7,501 jobs from 2010 to 2014 and has average annual wages of $29,659 and average employment of 59,406. Admin & Support Services gained 7,832 jobs from 2010 to 2014 and has average annual wages of $47,318 and average employment of 89,658. Professional and Technical Services gained 9,023 jobs from 2010 to 2014 and has average annual wages of $104,524 and average employment of 96,434. Accommodation and Food Services gained 12,212 jobs from 2010 to 2014 and has average annual wages of $20,624 and average employment of 124,529.

The Shift in Employment Share

The steady growth of the education and health services sector has shifted its position in the state economy to the top-employing sector. It now accounts for 19.5% of the state’s employment. That top spot had recently belonged to the trade, transportation, and utilities sector in 2008. The largest drop in job share came in the goods producing sector, dropping from a 14.9% share in 2008 to a 13.0% share in 2014. Detailed below is how the levels of nonfarm employment by major sector have changed since the annual average levels of 2008 and give us a
better sense of how the recession affected the state’s economy. Next we detail the current structure of employment in Connecticut. Even after the declines described above, manufacturing is the fourth largest sector (after health care, retail, and education). Education and Health Services added 28,200 jobs from 2008 to 2014. During the same period Leisure and Hospitality added 13,600, and Professional and Business Services added 6,300. On the other hand, Other Services fell by 100, Information by 6,000, Transportation, Trade and Utilities by 8,600, Government by 14,600, Financial Activities by 14,800 and Goods Producing by 36,900. During the 2008 to 2014 period, the share of nonfarm jobs that were in the education and health services sector increased by 2.0% points, the Leisure and Hospitality share increased by 1.0% point, Professional and Business Services increased by 0.6% point and Other Services increased its share by 0.1% point. On the other hand Trade, Transportation and Utilities share shrank by 0.2% point, Information by 0.3% point, Government by 0.6% point and Financial Activities by 0.7% point. The share of employment in the goods producing sector fell by 1.9% points. For the year ending 2015 quarter 1 the structure of the Connecticut economy is as follows, starting with the sector with the most jobs and ending with the sector with the fewest jobs. Health Care had 222,684 jobs. Retail Trade had 184,959 jobs. Public and Private Educational Services had 172,416 jobs. Manufacturing had 159,214 jobs. Accommodation & Food Services had 124,136 jobs. Finance & Insurance had 107,772 jobs. Professional, Scientific & Technical Services had 95,667 jobs. Administrative & Support Services had 86,436 jobs. Government excluding Education, Hospitals and Casinos had 78,381 jobs. Wholesale Trade had 63,066 jobs. Other Services had 60,827 jobs. Social Assistance had 59,130 jobs. Construction had 56,554 jobs. Transportation & Warehousing had 50,368 jobs. Arts, Entertainment, & Recreation had 40,063 jobs. Information had 32,083 jobs. Management of Companies had 32,041 jobs. Real Estate had 19,405 jobs. Utilities had 5,935 jobs. Agriculture & Forestry had 5,211 jobs. Mining & Quarrying had 552 jobs. (iii) Education and Skill Levels of the Workforce- Provide an analysis of the educational and skill level of the workforce. Connecticut’s Workforce Connecticut has an educated workforce. Thirty-eight percent of the population age 25 years of age and older has a college degree compared to just 30% for the nation as a whole. 90% have at least a high school diploma or a GED compared to 87% for the nation. However, there is an achievement gap between population groups. As shown in Exhibit 16, educational attainment is significantly lower for the African-American and Hispanic population than for the white non-Hispanic population. This gap is of particular concern giving the changing nature of Connecticut’s workforce. As shown in Exhibit 17, approximately 16% of the Connecticut’s labor force aged 45 and over is Black or Hispanic compared to more than 30% of the labor force aged 25 to 34. According to the American Community Survey 2014 one-year sample, Connecticut’s educational attainment for its population aged 25 and over is detailed as follows. Those with less than a high school diploma comprise 10% of the total population 6% of the White Non-Hispanic population 14% of the Black or African/American Population, and 28% of the Hispanic or Latino population. Those with a high school diploma or GED comprise 27% of the total population 27% of the White Non-Hispanic population 33% of the Black or African/American Population, and 33% of the Hispanic or Latino population. Those with some college but less than a Bachelor’s degree comprise 25% of the total population 25% of the White Non-Hispanic population 31% of the Black or African/American Population, and 22% of the Hispanic or Latino population. Those with a Bachelor’s degree or more comprise 38% of the total population 42% of the White Non-Hispanic population 21% of the Black or African/American Population, and 17% of the Hispanic or Latino population. According to the American Community Survey 2013, IPUMS-USA, University of Minnesota, www.ipums.org, the Connecticut Labor Force is comprised of the following groups. 63% of the labor force less than age 25 is white not Hispanic 62% of the labor force age 25 to 34 is white not Hispanic 64% of the labor force aged 35 to 44 is white not Hispanic 76% of the labor force aged 45 5o 54 is white not Hispanic 83% of the labor force aged 55 and above is white not Hispanic, and 71% of the total labor force is white not Hispanic. 12% of the labor force less than age 25 is Black or African American 12% of the labor force age 25 to 34 is Black or African American 64% of the labor force aged 35 to 44 is Black
or African American 76% of the labor force aged 45 to 54 is Black or African American 83% of the labor force aged 55 and above is Black or African American, and 71% of the total labor force is Black or African American. 20% of the labor force less than age 25 is Hispanic or Latino 19% of the labor force aged 25 to 34 is Hispanic or Latino 64% of the labor force aged 35 to 44 is Hispanic or Latino 76% of the labor force aged 45 to 54 is Hispanic or Latino 83% of the labor force aged 55 and above is Hispanic or Latino, and 71% of the total labor force is Hispanic or Latino. 6% of the labor force less than age 25 is other 7% of the labor force age 25 to 34 is other 64% of the labor force aged 35 to 44 is other 76% of the labor force aged 45 to 54 is other 83% of the labor force aged 55 and above is other, and 71% of the total labor force is other. Critical Workforce Segments College Students: Connecticut’s state colleges and universities (CSCU) system provides a high quality post-secondary education to over 92,000 students at its 17 campuses and annually graduates 15,000 who enter the job market to fill critical openings in the state’s workforce. These individuals, who are critical to the talent pipeline, are engaged in college programs related to the state’s high demand and emerging industries and occupations and often have the opportunity to pair this educational experience with internships in their chosen fields. Incumbent Workers: Connecticut’s incumbent workers – individuals presently employed – are an important resource for business success. Employers value highly the asset represented by their current employees. As they contemplate ways to increase productivity, assure profitability and grow their businesses, many Connecticut employers look to build the capacity of their current workers. Incumbent worker training is the most effective way to ensure that currently employed workers have the fast-changing skills they need to increase productivity and advance their careers. Dislocated Workers: Workers at-risk in rapidly changing industries, many of whom are aging and/or have not kept up with increasing skills demands in new workplace technologies and processes valued by employers and essential to remaining productive and competitive. While the number of newly certified dislocated workers in Connecticut is comparably small (2180 in the second quarter of 2012), they are a significant pool of valuable talent – ideal for targeted training in the middle-skill occupations projecting large numbers of openings. Veterans: Connecticut’s recently returned military veterans are a pool of under-utilized talent whose skills and experience should contribute to state economic growth. The state’s workforce/talent system has struggled to access these veterans, to assess their transferable skills and get them onto pathways that match them efficiently with viable job opportunities in Connecticut’s labor market. Additional coordination among veteran-serving organizations will help to tap this talent pool. A state-level cross-agency plan is currently under development. Undereducated Adults: Although Connecticut ranks high nationally on educational attainment, it still faces a significant challenge in meeting the needs of undereducated adults. According to the 2014 American Community Survey, Connecticut has a population of 3,596,677 with 2,821,801 adults over the age of eighteen. More than 288,478 individuals, or 9.9% of the adult population, do not have a high school diploma; 103,816 individuals have less than a ninth grade education; and 184,662 have some high school education, but no diploma. At a time when economic and labor trends all point to the importance of education and training for self-sufficiency, the number of undereducated adults in Connecticut approximates its entire K-12 population. According to the Connecticut State Department of Education’s Connecticut Adult Reporting System (CARS), in 2014 adult education programs served 24,751 students (10,773 males and 13,978 females), or 11.9% of the total population 18 or older without a high school diploma and 4.4% of the population 18 or older who do not speak English very well. While performance indicators are positive for individuals who attend adult education programs, very few undereducated adults have enrolled in these programs. This disparity, mirrored on the national level, indicates that adult education is critically underutilized by undereducated adults. According to Reach Higher, America: Overcoming Crisis in the U.S. Workforce (Report of the National Commission on Adult Literacy, June 2008), 70% of Connecticut jobs will require postsecondary education and training by the year 2020. The report states that to fill this gap, Connecticut will need 10,875 more people to receive postsecondary education and training. There are not enough high school graduates to fill that void – Connecticut must rely on getting older adults
back into the classroom. Adults need to improve their literacy skills and earn degrees and/or certificates to be able to make family-sustaining wages, but the fact remains that a limited number of the most undereducated people in Connecticut are enrolling in programs geared to help them improve their skills, get a high school equivalency, and enroll in postsecondary education and training. In the 2007 State New Economy Index, Atkinson and Nager stated that in today's New Economy, knowledge-based jobs are driving prosperity – jobs held by individuals with at least two years of college. Although the 2014 report shows that the average educational attainment grade level for people in Connecticut is 14.6, that is not enough to fill the anticipated skills gap (Information Technology and Innovation Foundation). Limited English Proficient: Approximately 50% of the two million immigrants who come to the U.S. each year have low literacy levels and lack high school education and English language skills, severely limiting their access to jobs and job training, college, and citizenship (Reach Higher, America: Overcoming Crisis in the U.S. Workforce). Immigrants represent one-third of America's low-skilled adults, more than in comparison countries that have fewer immigrants overall (PIAAC). Of 3,407,815 residents of Connecticut (aged 5 or older), 8.1% or 276,033 state they speak English less than “very well” and 21.8% or 742,903 speak a language other than English at home (2014 American Community Survey). The number of adults who are limited English proficient (LEP) is more prevalent in the larger metropolitan areas. The number of LEP adults in New Haven is 51,204 or 9% of the population; in Hartford, 61,152 or 7.6%; in Bridgeport-Stamford-Norwalk, 86,549 or 14.3%. Adult education programs in Connecticut served 120,195 adults, or 4.4% of the population 18 and older who do not speak English well, during the 2013-2014 program year. Those lacking a high school diploma who speak English very well earn more than those with a high school diploma or some college who don't speak English well or at all. Working-age LEP adults earn 25%-40% less than their English-proficient counterparts and are more concentrated in low-paying jobs and different industries than other workers (“Investing in English Skills: The Limited English Proficient Workforce in U.S. Metropolitan Areas," Brookings Institute, September 24, 2014). Individuals with Disabilities: According to the 2014 Census, 191,185 of Connecticut adults between the ages of 18-64 have a disability. The American Community Survey (ACS) of the U.S. Census analysis of employment and disability status reports 76,791 persons with a disability employed in Connecticut in 2014, and 13,116 unemployed. (Numbers not strictly comparable to the unemployment rates other tables as they come from a different survey with a different methodology.) Median earnings for people with disabilities in 2014 were $21,756, while people without disabilities earned $40,249. U.S. adults with a diagnosed learning disability are about twice as likely to have low skills as those without such disabilities (PIAAC). Employment status by type of disability is as follows. 25% of the 19,308 individuals with a hearing difficulty are employed. 18% of the 12,854 individuals with a vision difficulty are employed. 36% of the 27,611 individuals with a cognitive difficulty are employed. 32% of the 24,431 individuals with an ambulatory difficulty are employed. 8% of the 5,858 individuals with a self-care difficulty are employed. 19% of the 14,691 individuals with an independent living difficulty are employed. The Department of Rehabilitation Services (DORS), has projected their general and Blind VR programs will collectively assist 10,151 consumers with disabilities in FFY 2017. Low-Skilled/Low-Income Individuals: A significant portion of Connecticut’s current labor force – more than 500,000 adults – lacks the essential skills needed to secure rewarding employment and/or pursue postsecondary education/training. As seen in Exhibit 19 55% of adults 25-34 years old have no more than a high school diploma, not enough to prepare them adequately for the middle skill jobs that are available. Given effective opportunities for education, training and other supports, many of these individuals can be more productive workers, a talent asset helping employers to meet their workforce needs. The educational attainment of Connecticut's 25 to 34 year olds is compared to the attainment of the same group for the U.S. as follows. 11% of Connecticut 25 to 34 year olds are not a high school graduate compared to 13% for the U.S. 44% of Connecticut 25 to 34 year olds have a high school diploma or GED compared to 48% for the U.S. 6% of Connecticut 25 to 34 year olds have an Associate’s degree compared to 8% for the U.S. 25% of Connecticut 25 to 34 year olds have a Bachelor’s degree compared to 22% for
the U.S. 14% of Connecticut 25 to 34 year olds have a graduate degree compared to 9% for the U.S. In the U.S., the odds of being low-skilled are ten times higher for low-educated adults born to low-educated parents than for higher-educated adults born to higher-educated parents, according to the Program for the International Assessment of Adult Competencies (PIAAC). According to the National Institute for Literacy, improving a mother’s literacy skills is the best way to ensure that children have higher skills (Improving Mothers’ Literacy Skills May Be Best Way to Boost Children’s Achievement, 2010). Connecticut’s 2014 overall poverty rate was 10.8%, but 11.3% for women and 15% for children. The percent of single parent families with related children that are below poverty was 30% (Spotlight on Poverty and Opportunity, 2014). The relationship between low skills and low wages is strong in the United States, pointing to a critical need to provide adult education and family literacy services to undereducated parents and their children, especially in urban areas, to address immediate health, education and economic challenges. Accessing affordable efficient transportation to/from work is an obstacle to sustained, productive employability for many Connecticut workers. Public transportation services are inadequate for many workers – particularly low-wage workers from urban communities – pursuing job opportunities outside of their local community, in the wider surrounding region. For many families, childcare also presents a significant barrier to employment. For example, according to the United Way’s ALICE Report, the average cost of attending a full-time, accredited childcare center in Connecticut is $1,893 per month ($1,038 per month for an infant and $855 per month for a four year old). Childcare for two children is by far the greatest expense and accounts for 28% of United Way’s Household Survival Budget. While alternatives in Connecticut such as family daycare centers and state subsidized pre-school programs offer less expensive and more accessible childcare options, high occupancy rates limit their availability. Funding and resources available to provide basic skills instruction and technical training is limited in the face of the legitimate level of need for those services. Most of the available resources come with individual eligibility requirements – such as public assistance participation or high school dropout – that limit access to services for many prospective participants. Non-credit community college courses, offering opportunity for short-term technical training leading to more immediate employment, are ineligible for federal or state financial aid, forcing (limited-income) students to pay the cost of those courses directly themselves. Duplicated annual Non-Credit Registrations for the community colleges were as follows: AY 2014-2015; 57,756 total seats; 7,852 were workforce development certificates; and 29,904 personal development. Out-of-School Youth: Connecticut has one of the best high school graduation rates of all states for non-low-income students. The overall graduation rate has risen from 81.8% in 2010 to 87% in 2015. However, the dropout rate of Connecticut’s low-income youth is of critical concern. Connecticut has been one of the lowest states for graduation rates of low-income students, but is closing the gap. The 2011 gap between low-income students and their more affluent peers was 27 percentage points, but lessened to 21 percentage points in 2013 (Connecticut’s Graduation Gap is Big, But Shrinking, CT Mirror, May 2015). According to PIAAC, 15-year-old Americans have “mediocre” basic skills. Focusing on the challenge of educating and training to improve the skills of out-of-school youth is critical. Of Connecticut public high school students who graduated in 2010 and entered a CSCU institution within the first 16 months after graduation, a little under half (48.8%) were not ready for either college level math or English. More specifically, 54.3% of community college enrollees and 19.3% of state university enrollees from this cohort enrolled in at least one remedial course. In FY 2013-2014, Connecticut adult education programs served 6,041 students under age twenty-two. Adult education programs currently target and reach some youth from Connecticut’s urban centers, but the majority of recent high school dropouts are not enrolling in education programs. These young adults face serious barriers to employment attempting to compete in a labor market demanding viable interpersonal, problem-solving and technical skills, even at the entry-level. Ex-Offenders: One in every 100 U.S. adults 16 and older is incarcerated. Of 2.3 million individuals behind bars in state and federal prisons and local jails in 2005, about 43% of 18-60 year-olds lack a high school diploma or its equivalent. Further, the 2005 NAAL survey reported that 56% of inmates function at the two lowest levels of prose literacy
(National Adult Literacy Survey, 2005), documenting the need for adult education programs for the incarcerated. In Connecticut, 16,025 men and women were incarcerated in correctional facilities during 2015 – 14,941 male, 1,084 female. The Unified School District 1 – the Connecticut Department of Correction (DOC) – reported serving 2,669 students in ABE, GED, ESL, and Vocational Education instruction. Performance reports indicate that student scores improved by an average of 2 years/3 months in reading; 2 years/1 month in math; and 2 years/7 months in language arts on the Test of Adult Basic Education (TABE). Five hundred and seventy-seven students earned the General Educational Development diploma (GED), 6 earned the External Diploma and 15 students were awarded the Credit Diploma Program (CDP) diploma. Despite this demonstrable success, these programs served only 17% of the total number of inmates. TANF/TFA Recipients: The Connecticut Department of Social Services (CTDSS) operates the Temporary Family Assistance Program (TFA), a program of the federal Temporary Assistance for Needy Families (TANF) block grant. CTDSS provides temporary assistance to families in need of and eligible for cash assistance. During state fiscal year 2015, the department’s TFA average monthly caseload was 14,475 households. CTDSS partners with the Connecticut Department of Labor (CTDOL) to administer the Jobs First Employment Services (JFES) program, which has been successful in helping thousands of parents move into the workforce and off welfare rolls. TFA is a time-limited program that emphasizes case management intervention and participation in the labor market. TFA establishes a time limit of 21 months for families that contain an adult who is able to work. Extensions beyond 21 months may be available if the adult cannot find a job that makes the family financially independent. Able-bodied adults are referred to CTDOL’s JFES program, administered by the Department of Labor and regional Workforce Development Boards, for help in finding work. During the 21 months, and during extensions, adults must cooperate with the JFES program and make a good-faith effort to find a job and keep working. SNAP Recipients: As of January 4th, 2016 there were 232,937 households receiving nutrition assistance from the Supplemental Nutrition Assistance Program. These low income households include approximately 71,680 individuals who are not exempt from SNAP general work requirements. The Connecticut SNAP population is a diverse group with varying degrees of work readiness. HUSKY Recipients: Connecticut’s nation-leading implementation of the Affordable Care Act (ACA) continued in SFY 2015, with CTDSS partnering with Access Health CT in a shared/integrated eligibility system encompassing HUSKY Health (Medicaid/Children’s Health Insurance Program) and private qualified health plans offered through the exchange. As SFY 2015 ended, total enrollment was 747,735 of which approximately 460,000 are low-income adults. Non-Custodial Parents: Non-custodial parents are individuals who do not have custody of their children, yet still have an obligation to provide necessary supports. Non-custodial parents are identified by the CTDSS Child Support division in partnership with the Judicial Support Enforcement Services Division. Together, both units will assist parents in securing financial and medical support for their children by providing quality services and information in a courteous, efficient, and effective manner. Non-custodial parents, in order to achieve economic stability, need education, employment services and various supports like affordable housing, transportation, nutritional assistance and child care to insure the well-being of their children. Annually, approximately 60,000 cases with court-ordered support are monitored. The two units are responsible for court enforcement and assist both parents with court modification process and collect about $300 million in child support. Child support represents 45% of their family income. In addition, 188,000 children live in such families with 60% of parents receiving TANF or were former TANF recipients. In addition, 29% live below the federal poverty level. Older Workers: Connecticut has one of the country’s oldest populations. It also has the third highest life expectancy in the U.S. resulting in a growing population of those ages 85 and older (Connecticut State Plan on Aging October 1, 2014 - September 30, 2017). In 2014, 24% of the labor force was 55 years old or older. This represents a 5 percentage point gain since 2005 when older workers comprised 19% of the labor force. The CT State Department on Aging in its 2016-2020 draft plan for the employment of older workers has
identified significant strategies to align this population with services available through the American Job Centers and more broadly the state’s workforce development system.

Connecticut’s Unemployed Connecticut’s unemployment rate has been falling since the recession ended and as of August 2015 was 5.3%, only slightly higher than the national average. The average unemployment rate for 2014 was 6.6%. The unemployment rate was higher for men than for women, and higher for Black and Hispanic workers than for whites, and was lower the higher the level of educational attainment. In 2014 the unemployment rate was 6.6% for the entire labor force, 7.0% for men and 6.1% for women. For white men the unemployment rate was 6.2%, for while women 5.8% and for all whites it averaged 6.0% For Black/African-American men the unemployment rate was 14.9%, for Black/African-American women was 10.2% for an average of 12.5% for all African-American workers. For Asian men, the unemployment rate was 4.3%, for Asian women 2.0% for an average of 3.3% for all Asian workers. For Hispanic or Latino men, the unemployment rate was 12.0%, for Hispanic or Latino women 9.7% for an average of 10.9% for all Hispanic or Latino workers. The unemployment rate for those with less than a high school diploma was 10.8%, for those who graduated high school but had no college was 8.7%, for those with some college or an Associate’s degree it was 6.1%, and for those with a Bachelor’s degree or higher was 3.1%. The American Community Survey (ACS) of the U.S. Census reports employment status and disability status and reports that there were 76,791 persons with a disability employed in Connecticut in 2014 and 13,116 unemployed for an unemployment rate of 14.6%. These numbers are not strictly comparable to the unemployment rates in the tables because they come from a different survey with a different methodology.

(iv) Skill Gaps: Describe apparent ‘skill gaps’. Skills gaps / workforce alignment in targeted industry sectors There are no acceptable, direct objective measures of “skill gaps” currently available to LMI analysts. While there are a variety of resources that attempt to describe the knowledge, skills and abilities associated with various occupations there are no reliable ways to measure either the necessary quantity of these skills or the deficit if them in any particular occupation or industry. The best proxy we can apply is using any apparent imbalances in the supply and demand for workers in occupation as a result of growth in the associated industry or the need for replacements to fill vacancies. The Office of research in CTDOL maintains the TEPS system (Training and Education Planning system) which attempts match the annual openings as determined by our long term occupational projections against education program completer data relevant to that occupation. Within its limitations, the TEPS program will lend good insight into the supply and demand for entry level positions. However there is some anecdotal evidence that the nature of any skills gap may not be at the entry level. Conversations with some business leaders, particularly in manufacturing indicate that for them the skill gap is caused by the lack of sufficient mid-level workers to replace highly experienced senior workers at or near retirement. A fact of the recession is that if you did not hire a new employee five years ago you don’t have an employee with mid-level experience now. If we are to address this problem in workforce training, it suggests the need for longer term OJT subsidized training programs such as internships and apprentices.

Supply and Demand for Occupations in Targeted Sectors Detailed below are the targeted industry sectors the “supply” of new entrants completing education and training programs relative to the estimated long-term “demand” for openings in these occupations. Each occupation is designated in a workforce alignment category of “in balance” (BAL) if completers and estimated annual openings are within 20% of each other, “undersupplied” (UND) in the number of program completers is far less than the apparent need or “oversupplied” (OVR) of completers far exceed the apparent annual openings. A “?” is included in cases where out of state markets may be able to absorb trained candidates. Note that for a skills gap to exist at this level, a workforce alignment designation of UND is indicated. Estimated annual openings are from the Connecticut Department of Labor’s Long Term Occupational Projections 2012 to 2022.
Manufacturing sector: Occupations for which there have traditionally been no training programs available are not listed. For SOC Codes 51-4041, 51-4011 and 51-4012, Machinists and CNC Operators, the estimated hourly wage is 21.08 – 22.70, the minimum education is a high school diploma, and the estimated annual openings are 446. There are 486 program completers so the occupations are considered BAL. For SOC Code 51-9061, Inspectors, Testers, Sorters, Samplers, and Weighers, the estimated hourly wage is 20.54 the minimum education is high school, and the estimated annual openings are 243. There are 3 program completers so the occupation is considered UND. For SOC Code 51-2011, Aircraft Structure, Surfaces, Rigging, and Systems Assemblers, the estimated hourly wage is 30.31 the minimum education is high school, and the estimated annual openings are 65. There are 31 program completers so the occupation is considered UND. For SOC Code 51-4121, Welders, Cutters, Solderers, and Braziers, the estimated hourly wage is 19.51 the minimum education is high school, and the estimated annual openings are 62. There are 158 program completers so the occupation is considered OVR. For SOC Code 51-8031, Water and Wastewater Treatment Plant and System Operators, the estimated hourly wage is 27.47 the minimum education is high school, and the estimated annual openings are 46. There are 18 program completers so the occupation is considered UND.

Health Care Sector Diagnostic and Treatment Professional occupations (e.g. MD’s, Pharmacists, Dentists, etc.) are not included as the supply and demand for these occupations is national/international. Diagnosing and Treating Occupations: For SOC Code 29-2061, Licensed Practical and Licensed Vocational Nurses, the estimated hourly wage is 26.64 the minimum education is Postsecondary non-degree award, and the estimated annual openings are 374. There are 789 program completers so the occupation is considered OVR. For SOC Code 29-2021, Dental Hygienists, the estimated hourly wage is 40.14 the minimum education is Associate’s degree, and the estimated annual openings are 157. There are 231 program completers so the occupation is considered OVR. For SOC Code 29-2034, Radiologic Technologists, the estimated hourly wage is 30.61 the minimum education is Associate’s degree, and the estimated annual openings are 78. There are 125 program completers so the occupation is considered OVR. For SOC Code 29-2011, Medical and Clinical Laboratory Technologists, the estimated hourly wage is 34.12 the minimum education is Bachelor’s degree, and the estimated annual openings are 76. There are 20 program completers so the occupation is considered UND. For SOC Code 29-2032, Diagnostic Medical Sonographers, the estimated hourly wage is 37.91 the minimum education is Associate’s degree, and the estimated annual openings are 52. There are 60 program completers so the occupation is considered BAL. For SOC Code 29-2053, Psychiatric Technicians, the estimated hourly wage is 23.28 the minimum education is Postsecondary non-degree award, and the estimated annual openings are 17. There are 246 program completers so the occupation is considered OVR. For SOC Code 29-2033, Nuclear Medicine Technologists, the estimated hourly wage is 40.89 the minimum education is Associate’s degree, and the estimated annual openings are 11. There are 7 program completers so the occupation is considered BAL. For SOC Code 29-2051, Dietetic Technicians, the estimated hourly wage is 15.61 the minimum education is Associate’s degree, and the estimated annual openings are 5. There are 194 program completers so the occupation is considered OVR. For SOC Code 29-2091, Orthotists and Prosthetists, the estimated hourly wage is 41.79 the minimum education is
Master’s degree, and the estimated annual openings are 4. There are 19 program completers so the occupation is considered OVR. For SOC Code 29-2054, Respiratory Therapy Technicians, the estimated hourly wage is 31.66 the minimum education is Associate’s degree, and the estimated annual openings are 2. There are 89 program completers so the occupation is considered OVR. Health Technology Occupations: For SOC Code 29-2061, Licensed Practical and Licensed Vocational Nurses, the estimated hourly wage is 26.64 the minimum education is Postsecondary non-degree award, and the estimated annual openings are 374. There are 789 program completers so the occupation is considered OVR. For SOC Code 29-2021, Dental Hygienists, the estimated hourly wage is 40.14 the minimum education is Associate’s degree, and the estimated annual openings are 157. There are 231 program completers so the occupation is considered OVR. For SOC Code 29-2034, Radiologic Technologists, the estimated hourly wage is 30.61 the minimum education is Associate’s degree, and the estimated annual openings are 78. There are 125 program completers so the occupation is considered OVR. For SOC Code 29-2011, Medical and Clinical Laboratory Technologists, the estimated hourly wage is 34.12 the minimum education is Bachelor’s degree, and the estimated annual openings are 76. There are 20 program completers so the occupation is considered UND. For SOC Code 29-2012, Medical and Clinical Laboratory Technicians, the estimated hourly wage is 23.44 the minimum education is Associate’s degree, and the estimated annual openings are 73. There are 26 program completers so the occupation is considered UND. For SOC Code 29-2071, Medical Records and Health Information Technicians, the estimated hourly wage is 19.77 the minimum education is Postsecondary non-degree award, and the estimated annual openings are 62. There are 314 program completers so the occupation is considered OVR. For SOC Code 29-2055, Surgical Technologists, the estimated hourly wage is 26.27 the minimum education is Postsecondary non-degree award, and the estimated annual openings are 41. There are 77 program completers so the occupation is considered OVR. For SOC Code 29-2032, Diagnostic Medical Sonographers, the estimated hourly wage is 37.91 the minimum education is Associate’s degree, and the estimated annual openings are 52. There are 60 program completers so the occupation is considered BAL. For SOC Code 29-2053, Psychiatric Technicians, the estimated hourly wage is 23.28 the minimum education is Postsecondary non-degree award, and the estimated annual openings are 17. There are 246 program completers so the occupation is considered OVR. For SOC Code 29-2033, Nuclear Medicine Technologists, the estimated hourly wage is 40.89 the minimum education is Associate’s degree, and the estimated annual openings are 11. There are 7 program completers so the occupation is considered BAL. For SOC Code 29-2051, Dietetic Technicians, the estimated hourly wage is 15.61 the minimum education is Associate’s degree, and the estimated annual openings are 5. There are 194 program completers so the occupation is considered OVR. For SOC Code 29-2091, Orthotists and Prosthetists, the estimated hourly wage is 41.79 the minimum education is Master’s degree, and the estimated annual openings are 4. There are 19 program completers so the occupation is considered OVR. For SOC Code 29-2054, Respiratory Therapy Technicians, the estimated hourly wage is 31.66 the minimum education is Associate’s degree, and the estimated annual openings are 2. There are 89 program completers so the occupation is considered OVR. Healthcare Support Occupations: For SOC Code 31-1013, Psychiatric Aides, the estimated hourly wage is 16.02 the minimum education is High school diploma or equivalent, and the estimated annual openings are 28. There are 246 program completers so the occupation is considered OVR. For SOC Code 31-2011, Occupational Therapy Assistants, the estimated hourly wage is 28.47 the minimum education is Associate’s degree, and the estimated annual openings are 29. There are 81 program completers so the occupation is considered BAL. For SOC Code 31-9091, Dental Assistants, the estimated hourly
wage is 19.79 the minimum education is Postsecondary non-degree award, and the estimated annual openings are 122. There are 406 program completers so the occupation is considered OVR. For SOC Code 31-9092, Medical Assistants, the estimated hourly wage is 16.09 the minimum education is Postsecondary non-degree award, and the estimated annual openings are 340. There are 1980 program completers so the occupation is considered OVR. For SOC Code 31-9097, Phlebotomists, the estimated hourly wage is 17.4 the minimum education is Postsecondary non-degree award, and the estimated annual openings are 53. There are 53 program completers so the occupation is considered BAL.

For SOC Code 31-9092, Medical Assistants, the estimated hourly wage is 16.09 the minimum education is Postsecondary non-degree award, and the estimated annual openings are 340. There are 1980 program completers so the occupation is considered OVR. For SOC Code 31-9097, Phlebotomists, the estimated hourly wage is 17.4 the minimum education is Postsecondary non-degree award, and the estimated annual openings are 53. There are 53 program completers so the occupation is considered BAL.

Other Sectors Construction Sector: For SOC Code 47-1011, First-Line Supervisors of Construction Trades and Extraction Workers, the estimated hourly wage is 33.1 the minimum education is High school diploma or equivalent, and the estimated annual openings are 153. There are 751 program completers so the occupation is considered OVR. For SOC Code 47-2021, Brickmasons and Blockmasons, the estimated hourly wage is 28.35 the minimum education is High school diploma or equivalent, and the estimated annual openings are 22. There are 10 program completers so the occupation is considered UND. For SOC Code 47-2022, Stonemasons, the estimated hourly wage is 24.12 the minimum education is High school diploma or equivalent, and the estimated annual openings are 6. There are 10 program completers so the occupation is considered BAL. For SOC Code 47-2031, Carpenters, the estimated hourly wage is 23.6 the minimum education is High school diploma or equivalent, and the estimated annual openings are 268. There are 81 program completers so the occupation is considered UND. For SOC Code 47-2044, Tile and Marble Setters, the estimated hourly wage is 25.09 the minimum education is Less than high school, and the estimated annual openings are 3. There are 10 program completers so the occupation is considered OVR. For SOC Code 47-2111, Electricians, the estimated hourly wage is 27.2 the minimum education is High school diploma or equivalent, and the estimated annual openings are 241. There are 545 program completers so the occupation is considered OVR. For SOC Code 47-2152, Plumbers, Pipefitters, and Steamfitters, the estimated hourly wage is 28.39 the minimum education is High school diploma or equivalent, and the estimated annual openings are 150. There are 115 program completers so the occupation is considered BAL. For SOC Code 11-9021, Construction Managers, the estimated hourly wage is 49.16 the minimum education is Bachelor’s degree, and the estimated annual openings are 146. There are 60 program completers so the occupation is considered UND. For SOC Code 13-2011, Accountants and Auditors, the estimated hourly wage is 75.0 the minimum education is Bachelor’s degree, and the estimated annual openings are 117. There are 116 program completers so the occupation is considered BAL. For SOC Code 17-3011, Architectural and Civil Drafters, the estimated hourly wage is 27.2 the minimum education is Associate’s degree, and the estimated annual openings are 10. There are 114 program completers so the occupation is considered OVR. For SOC Code 17-3022, Civil Engineering Technicians, the estimated hourly wage is 30.01 the minimum education is Associate’s degree, and the estimated annual openings are 9. There are 6 program completers so the occupation is considered BAL. For SOC Code 17-3024, Electro-Mechanical Technicians, the estimated hourly wage is 24.4 the minimum education is Associate’s degree, and the estimated annual openings are 4. There are 12 program completers so the occupation is considered BAL. For SOC Code 17-3025, Environmental Engineering Technicians, the estimated hourly wage is 27.39 the minimum education is Associate’s degree, and the estimated annual openings are 5. There are 25 program completers so the occupation is considered OVR. For SOC Code 31-9097, Phlebotomists, the estimated hourly wage is 17.4 the minimum education is Postsecondary non-degree award, and the estimated annual openings are 53. There are 53 program completers so the occupation is considered OVR.
hourly wage is 37.55 the minimum education is Bachelor’s degree, and the estimated annual openings are 663. There are 1,015 program completers so the occupation is considered OVR ?. For SOC Code 12-2021, Appraisers and Assessors of Real Estate, the estimated hourly wage is 40.81 the minimum education is Bachelor’s degree, and the estimated annual openings are 7. There are 8 program completers so the occupation is considered BAL. For SOC Code 13-2031, Budget Analysts, the estimated hourly wage is 38.28 the minimum education is Bachelor’s degree, and the estimated annual openings are 48. There are 1,514 program completers so the occupation is considered OVR. For SOC Code 13-1031, Claims Adjusters, Examiners, and Investigators, the estimated hourly wage is 35.31 the minimum education is High school diploma or equivalent, and the estimated annual openings are 108. There are 14 program completers so the occupation is considered UND. For SOC Code 13-1051, Cost Estimators, the estimated hourly wage is 36.36 the minimum education is Bachelor’s degree, and the estimated annual openings are 110. There are 4,135 program completers so the occupation is considered OVR. For SOC Code 13-2041, Credit Analysts, the estimated hourly wage is 46.46 the minimum education is Bachelor’s degree, and the estimated annual openings are 42. There are 1,514 program completers so the occupation is considered OVR. For SOC Code 13-2071, Credit Counselors, the estimated hourly wage is 23.88 the minimum education is Bachelor’s degree, and the estimated annual openings are 3. There are 13 program completers so the occupation is considered BAL. For SOC Code 15-2011, Actuaries, the estimated hourly wage is 56.49 the minimum education is Bachelor’s degree, and the estimated annual openings are 65. There are 177 program completers so the occupation is considered OVR ?. For SOC Code 15-1111, Computer and Information Research Scientists, the estimated hourly wage is 55.98 the minimum education is PhD, and the estimated annual openings are 7. There are 563 program completers so the occupation is considered OVR ?.
Managers, the estimated hourly wage is 67.10 the minimum education is Bachelor’s degree, and the estimated annual openings are 214. There are 791 program completers so the occupation is considered OVR. For SOC Code 15-1143, Computer Network Architects, the estimated hourly wage is 51.71 the minimum education is Bachelor’s degree, and the estimated annual openings are 24. There are 510 program completers so the occupation is considered OVR. For SOC Code 15-1152, Computer Network Support Specialists, the estimated hourly wage is 38.55 the minimum education is Associate’s degree, and the estimated annual openings are 27. There are 254 program completers so the occupation is considered OVR. For SOC Code 15-1131, Computer Programmers, the estimated hourly wage is 42.15 the minimum education is Bachelor’s degree, and the estimated annual openings are 131. There are 377 program completers so the occupation is considered OVR. For SOC Code 15-1113, Computer Programmers, the estimated hourly wage is 45.82 the minimum education is Bachelor’s degree, and the estimated annual openings are 337. There are 384 program completers so the occupation is considered BAL. For SOC Code 15-1151, Computer User Support Specialists, the estimated hourly wage is 28.24 the minimum education is Some College, and the estimated annual openings are 283. There are 8 program completers so the occupation is considered UND. For SOC Code 15-1141, Database Administrators, the estimated hourly wage is 42.99 the minimum education is Bachelor’s degree, and the estimated annual openings are 44. There are 275 program completers so the occupation is considered OVR. For SOC Code 15-1122, Information Security Analysts, the estimated hourly wage is 44.81 the minimum education is Bachelor’s degree, and the estimated annual openings are 26. There are 284 program completers so the occupation is considered OVR. For SOC Code 15-1142, Network and Computer Systems Administrators, the estimated hourly wage is 42.04 the minimum education is Bachelor’s degree, and the estimated annual openings are 91. There are 277 program completers so the occupation is considered OVR. For SOC Code 152031, Operations Research Analysts, the estimated hourly wage is 46.36 the minimum education is Bachelor’s degree, and the estimated annual openings are 44. There are 87 program completers so the occupation is considered OVR. For SOC Code 15-1132, Software Developers, Applications, the estimated hourly wage is 46.98 the minimum education is Bachelor’s degree, and the estimated annual openings are 255. There are 361 program completers so the occupation is considered BAL. For SOC Code 15-1132, Software Developers, Systems Software, the estimated hourly wage is 46.39 the minimum education is Bachelor’s degree, and the estimated annual openings are 159. There are 441 program completers so the occupation is considered OVR. For SOC Code 15-2041, Statisticians, the estimated hourly wage is NA the minimum education is Master’s degree, and the estimated annual openings are 26. There are 476 program completers so the occupation is considered OVR. For SOC Code 15-1134, Web Developers, the estimated hourly wage is 33.49 the minimum education is Associate’s degree, and the estimated annual openings are 62. There are 222 program completers so the occupation is considered OVR.

The Connecticut Department of Labor’s Office of Research proactively shares its labor market data with Connecticut high schools and Community Colleges. Our Connecticut Career Resource Network produces a regular newsletter and “Connecticut Career Paths”. Approximately 150,000 copies of “Connecticut Career Paths” are printed and distributed to high school guidance counselors and college career counselors throughout the state. Our annual conference “Connecticut Learns and Works” is attended by hundreds of educators from Connecticut high schools and community colleges. Economists from the Office of Research have made presentations regarding labor market information to guidance and career counselors at forums sponsored by the Connecticut State Department of Education and professional development days sponsored by local school districts. The Office of Research is in continual contact with the Board of Regents as well as the individual Community Colleges, which use labor market information for strategic planning as well as sharing it with students for career planning purposes.
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.

The various entities, partners and stakeholders comprising Connecticut’s extensive informal workforce development system have planned and implemented a broad array of innovative initiatives addressing Connecticut’s workforce development priorities. Following is an illustrative sample of selected recent noteworthy efforts:

(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.

Supporting Business Growth Subsidized Training and Employment Program (Step–Up) Established in the 2011 Jobs Bill, Step–Up is a joint venture of the Connecticut Department of Labor (CTDOL) and the state’s five regional WDBs. Originally providing two employer incentives – Wage Subsidy and Small Manufacturing Training Grant – to encourage eligible Connecticut businesses to hire more qualified workers, the focus has been on small businesses and manufacturers and economically threatened unemployed residents of high unemployment communities. Step–Up expanded in 2012 to include the Unemployed Armed Forces Member incentive for employers of any size to hire eligible veterans. Step–Up participants typically are Connecticut residents possessing some of the qualifications needed for work but require additional on-the-job training experience to meet the job-specific needs of participating employers. Wage Subsidy incentives for new hires extend over a six-month period and can amount to a $12,000 employer reimbursement. Small Manufacturing Training Grants provide up to $12,500 per new hire. Jobs for which Step–Up participants have been hired cover a wide range, including CNC operators, machine operators, CAD designers, engineers, production coordinators, plant operators, graphic designers, sales representatives, warehouse
support specialists, marketing support specialists, customer service representatives and office assistants. Through December 2014, a total of 705 employers participated in the Subsidized Wage and Small Manufacturing initiatives, resulting in the hiring of 2,590 individuals, at an average hourly wage of approximately $14.76. Average employer reimbursement was approximately $9,576 per new employee. Connecticut Manufacturing Innovation Fund In 2014 the General Assembly created a $30 million Connecticut Manufacturing Fund to support innovation and growth in the state’s advanced manufacturing sector. The fund assists manufacturers to develop or modernize critical equipment, support technological advancement, encourage research and development, and provide critical workforce training. The objective is to strengthen the supply chain network of small/medium manufacturing companies and ensure a productive, flexible, well–trained advanced manufacturing talent pool with competitive skills. The Department of Economic and Community Development (DECD) provides administrative oversight, with the counsel and support of an eleven member advisory board, the majority from manufacturing companies. The Fund encourages company/university research efforts; creates a voucher program to support targeted business development and technical needs; provides access to training and educational programs to develop required workforce skills; provides matching funds for federal grants; and helps attract new manufacturers to Connecticut. Funding is also provided to support incumbent worker training and Registered Apprenticeships as specified in the next two pages. Incumbent Worker Training In 2013 the General Assembly adopted legislation consolidating into a single program the 21st Century Job Training Program administered by the Connecticut Department of Labor (CTDOL) and the Incumbent Worker Training program previously operated by the WDBs. The resulting consolidated Incumbent Worker Training program is administered by CTDOL. The program provides critical resources to help Connecticut businesses and employers partially defray the instructional costs of enhancing the skills of current employees. Goals are to sustain economically vital industries with high–growth occupations and assist workers obtain skills to advance their careers. CTDOL Business Service Consultants work directly with participating companies to develop training projects and locate qualified training providers. Participating employers are required to provide a minimum match of 50%. IWT grants are structured to be flexible in meeting the company’s training objectives. In the 2013–14 program year CTDOL expended approximately $700,000 in Incumbent Worker Training funds, writing a total of 88 training contracts with Connecticut employers. The governing legislation mandates that a minimum of 50% of available state funds go to employers that had not previously participated in the program, thereby encouraging a variety of companies to utilize these resources. Priority is given to high–growth businesses committed to creating career ladders for their front line employees, providing a safe and healthy workplace, and offering wages and benefits that exceed industry averages. CTDOL far surpassed this legislative requirement by expending 81% of available funds with new employers. A total of 2,061 employees participated in these training offerings. That number does not include three statewide contracts executed with Central Connecticut State University’s Institute of Technology and Business Development, CONNSTEP, and the Middlesex County Chamber of Commerce, respectively, which included training in the Manufacturing, Allied Health, and Green Technology sectors. The Manufacturing Innovation Fund (MIF) Incumbent Worker Training Program is administered by the Connecticut Department of Labor and funded through the Department of Economic and Community Development. The program provides financial assistance to Connecticut manufacturers for growing innovative and technology–based manufacturing business in Connecticut. The goals are: • To support advanced manufacturing and innovative companies in their efforts to train incumbent workers in the appropriate skills to meet current and emerging market needs, • To bring technological innovation to the market and help manufacturing companies leap ahead in productivity and efficiency by enhancing the skills of their current workforce and • To maintain sales and grow revenue and profitability. The MIF Incumbent Worker Training program is a matching fund program, designed to help manufacturing companies provide training for their workforce. It offers up to up to $100,000 maximum per employer, per calendar year equal to the approved amount. Apprenticeship The Office of Apprenticeship Training
(CTDOL) manages registered apprenticeships in Connecticut. Significant efforts are underway to expand apprenticeship opportunities in targeted industries, including healthcare, information technology, and a major emphasis on advanced manufacturing. Starting in 2014 participants in the community college–based Advanced Manufacturing Centers have been able to earn 576 hours of related instruction toward an Apprenticeship in manufacturing. The Step–Up program recently added a new apprenticeship component. Aggressive outreach by the Office of Apprenticeship Training has increased the number of manufacturers enlisted as employer sponsors and the number of full–time manufacturing apprentices and pre–apprentices. More Connecticut employers have taken advantage of the Manufacturing Apprenticeship Tax Credit. The new $7.8 million Manufacturing Innovation Fund Apprenticeship Program was launched in July 2015. The Connecticut Department of Labor (CTDOL) and its Office of Apprenticeship Training is lead applicant in Connecticut’s successful bid to win a highly competitive American Apprenticeship Grant of $5 million to fund the Connecticut American Apprenticeship Initiative. A key component of the initiative is introduction of Competency and Competency/Time–Based Hybrid models of apprenticeship. The initiative will enroll and serve 1,000 registered apprentices and 500 pre–apprentices statewide in high–demand Advance Manufacturing, Healthcare and Business Services occupations. Employers ranging from small machine shops to General Dynamics Electric Boat division, the regional WDBs, and the Board of Regents for Higher Education provided significant commitments for apprenticeship placements. The Manufacturing Innovation Fund (MIF) Apprenticeship Program, funded through the Department of Economic and Community Development, is administered by the Connecticut Department of Labor. It provides financial assistance to Connecticut manufacturers that have a Registered Apprentice Program as well as, approved Apprentice Related Instruction Training Providers. The goals of the MIF Apprenticeship Program are: to support manufacturing companies in their efforts to train Registered Apprenticeship workers in the appropriate skills to meet current and emerging market needs and occupational skills; to provide real time demand driven registered apprenticeship program that combines a structured work schedule of on the job training together with related classroom instruction. The MIF Apprenticeship Program assists manufacturing companies to provide training for new apprentices that are registered on or after July 1, 2015. The MIF Apprenticeship Program has three components: Types of Assistance 1. Wage Subsidy Reimbursement: The MIF Registered Apprenticeship funding per apprentice in manufacturing occupations is the "lesser" of the following: Funding of $5 per hour multiplied by the total number of hours worked during the company’s program per year by apprentice not to exceed more than 50% of the annual salary., or Funding of $6,000 per qualified apprentice for year one and $7,000 per qualified apprentice for year two. 2. Related Instruction Tuition Reimbursement: Reimbursement of apprentice tuition/training costs or payments on behalf of an apprentice duly registered with a qualified Apprenticeship Sponsor to a Related Instruction Provider chosen by the sponsor company and approved by the Connecticut Department of Labor Office of Apprenticeship Training shall not exceed $2,500 in year one and $1,250 in year two. 3. Competency/Performance Reimbursement: Reimbursement of reasonable and customary costs for Competency/Performance registered apprenticeships that have interim credentials embedded in the work and related instruction schedules shall not exceed $1,000 in year one and year two. Applicants may seek assistance in the form of a wage subsidy, tuition and credentialing reimbursement. The funds do not need to be repaid by the applicant, provided the applicant meets the deliverables and complies with the terms and conditions of the agreement. Integrated Basic Education and Skills Training Programs – Jobs First Employment Services In 2011, the Department of Labor (DOL) and Department of Social Services (DSS) convened a workgroup to recommend strategies to help Jobs First Employment Services (JFES) program participants increase competitiveness in the job market, while meeting the federal Temporary Assistance for Needy Families (TANF) work participation requirements. JFES is a component of the State’s TANF program.
As a result of these recommendations, the DOL allocated SFY14 and SFY15 funding for the “Integrated Basic Education and Skills Training (I–BEST)” pilot program. This pilot was based on the state of Washington’s nationally recognized model. I–BEST is an evidence–based model that provides vocational skills training simultaneously with adult basic education (ABE). The curriculum is designed jointly and classes are team taught by an adult education instructor and a specialist in the appropriate vocational field. The I–BEST model has proven to help participants improve their basic skills and/or achieve or progress towards a secondary education credential while attaining an industry–recognized credential.

In State Fiscal Year 2013–2014 (SFY14), the Connecticut legislature designated $1.7 million and in SFY15, $1.5 million in in funding to be used for “additional programming and evaluation” for JFES program participants. JFES is a component of the State’s Temporary Family Assistance (TFA) program that is funded, in part, by the federal Temporary Assistance to Needy Families (TANF) block grant. JFES participants receive employment services from American Job Center (AJC) staff or through contracted service providers. Services include job search assistance, vocational education, adult basic education, subsidized employment, case management and other support services such as transportation assistance.

The JFES I–BEST pilots were administered by the DOL through the WDBs operating as regional intermediaries subcontracting with service providers. The primary goals set for the WDBs included the attainment of industry–recognized credentials and improved post–program employment for JFES participants thereby, creating incentives for the WDBs to develop training opportunities that met local labor market needs.

Additionally, classes were team taught with both a vocational instructor and an adult basic education instructor to address any learning remediation needed by program participants. Participants were screened on interest in the training programs available as well as employability and barrier assessment. The period of instruction for the courses varied from 4 to 16 weeks and included unpaid internships, paid internships or subsidized employment opportunities. Five basic education providers and 11 vocational education providers offered the following credentials: National Professional Certificate in Customer Service from NRF (National Retail Federation); Qualified Food Handler Certificate; OSHA Certificate; CPR/First Aid Certificate; Certified Nursing Assistant Certificate; American Hotel and Lodging and Customer Service Certificate; CT Asbestos License; CT Lead Supervisor License; Deconstruction Certificate; OSHA/HAZWOPER 40 Certificate; Microsoft Office (Outlook) Certificate; Microsoft Office (Word) Certificate; Microsoft Office (Excel) Certificate; Microsoft Office (PowerPoint) Certificate; Microsoft Technology Certificate.

In SFY15, one hundred forty–five (67%) of the training opportunities were used by JFES participants who had a high school credential and 79 (35%) of the JFES participants had less than a high school credential, consistent with program design. One hundred fifty–eight (71%) of the courses of study were completed. For the slots filled by those with a high school credential, 108 (74%) completed. Among the program offerings filled by a JFES participant with less than a high school education; 50 (63%) completed. Thus, the course completion rate was somewhat higher among JFES participants who held a high school credential.

Among the 145 training slots filled by JFES participants who held a high school credential, 108 (74%) completed and 75 (70%) of them earned a vocational credential. For the 79 training slots filled by JFES participants who did not have a high school credential, 50 (63%) completed the course and 40 (80%) took a certification exam. All 40 (or 100%) passed the exam. Integrated Basic Education and Skills Training Programs – Adult Education Programs Since 2010 the Connecticut State
The Department of Education (CSDE) has invested in Program Improvement Project (PIP) grants to implement the Integrated Basic Education and Skills Training (I–BEST) program model across Connecticut to accelerate basic skills learning and career enhancement for adult education learners. Initial grants provided two years of incentive funding. PIP grants are underwritten with Workforce Investment Act Title II funds, to expand and improve educational services for adults lacking the basic skills and literacy skills for effective parenting, citizenship and employment. Eligible participants are students enrolled in mandated adult education classes (e.g., at least 17–years–old and officially withdrawn from high school). Objectives are to help adult secondary–level students and English–as–a–second–language learners improve reading, writing, math, English language acquisition and/or obtain a high school diploma while earning an industry–recognized credential in fields offering good wages and opportunities for career advancement. CSDE selected seven adult education providers to operate the I–BEST projects: New London Adult Education, EASTCONN, Enfield Adult Education, Capitol Region Education Council, Women and Families Education Center, Education Connection, Waterbury Adult Education. Providers collaborate with a training partner to offer funding for the technical aspects of instruction. In FY 2012–13 and FY 2014–15 a total of $210,000 in PIP funding was awarded to support educational (not technical) dimensions of the training, serving a total of 192 participants. The projects offer certifications in manufacturing, auto technician, culinary arts, emergency medical technician, pharmacy technician, certified nursing assistant, and software, serving individuals in English as a Second Language, adult basic education and high school completion programs. Through the Accelerating Connections to Employment (ACE) Grant, which was a randomized study, Gateway Community College students had the opportunity to attend career preparation programs at Gateway and move quickly into employment. ACE was funded by the U.S. Department of Labor and Annie E. Casey Foundation. The college offered no cost training programs for Community Health Worker, Culinary In–Front of the House, IT Help Desk, Patient Care Technician and Small Engine Repair through the (ACE) Grant. All of these Gateway students improved their basic skills while participating in lecture and work experience. Each student was assigned an internship experience and completed mock interviews before being placed in a job. Gateway had 190 students, 74% of the enrollees completed the program and 63% are employed. Jobs Funnel The Jobs Funnel was launched as a pilot in Hartford to provide qualified workers opportunities to pursue careers in the construction trades. Jobs Funnels programs now operate in two local workforce areas – north central and northwest – under the aegis of the respective regional WDBs. State–level coordination is provided through the Office of Workforce Competitiveness. State general fund dollars help support Jobs Funnel efforts. A three–year $5.8 million Green Jobs Innovation Fund USDOL grant (extended to 2015) helped to promote career pathways in “green construction” jobs. That successful effort was cited for several noteworthy and promising practices. These include the effective use of targeted outreach to job candidates, strong partnerships with the organized building trades, significant statewide partnerships among key stakeholders, proactive engagement of women in construction training, employment and innovative local hiring ordinances. Jobs Funnel services typically include: outreach/recruitment, assessment, case management, pre–employment training, job placement, and retention support services. Since their inception, the various regional funnel initiatives have helped to place more than 3,900 individuals in a variety of construction–related jobs, in both union and non–union settings, and in apprenticeships. The average hourly starting wage for participants who have completed the Jobs Funnel training is approximately $15–18. The Jobs Funnels are an example of innovative public–private partnerships involving employers, labor, community–based organizations, state and local agencies, non–profits and local funders to address shared objectives. Go Back to Get Ahead By 2020 approximately 70% of Connecticut jobs will require post–secondary education. To help address this challenge the Board of Regents for Higher Education in June 2014 launched the Go Back to Get Ahead initiative. The initiative targets individuals who had taken college courses before December 2012 but left school prior to completing their degree, or had achieved an associate’s degree but not a bachelor’s degree – approximately 65,000 individuals in Connecticut. The initiative provides up to nine (9) free credits
towards degree completion, via courses offered in a classroom setting or online, at the seventeen
(17) institutions of the Connecticut State Colleges and Universities system. As of January 2016, a
total of 1,085 individuals are enrolled in Go Back to Get Ahead with 540 at the community colleges,
232 at the state universities and 313 at Charter Oak State College. Platform to Employment The
Platform to Employment program – P2E – was launched by The WorkPlace, the regional WDB of
southwest Connecticut, to assist the long-term unemployed return to work, while addressing
employers’ needs to recruit skilled workers. P2E is a public–private partnership providing businesses
a risk–free opportunity to evaluate and consider hiring qualified participants in a work experience
program. P2E is geared to individuals who have exhausted their unemployment benefits.
Participants engage in a structured preparatory program including skills assessment, career
readiness workshops, employee assistance services, coaching and other supports. Upon completion
participants are helped to find open positions at local companies. Placements occur on a provisional
basis, partially subsidized over an eight–week trial period. The expectation is that a company
satisfied with a candidate’s performance will offer a full–time job. The General Assembly allocated
$3.6 million to implement P2E statewide in 2014–15, intended to serve 500 Connecticut residents.
The first statewide P2E class of 100 participants began in September 2014. P2E operates as a
partnership of the Connecticut Department of Labor, the Department of Rehabilitation Services and
the five regional WDBs, managed statewide by The Workplace, Inc. Eastern Connecticut
Manufacturing Pipeline Initiative The U.S. Department of Labor (USDOL) Workforce Innovation Fund
(WIF) supports projects that promote workforce investment system reforms and innovations to
facilitate cooperation across programs to improve employment outcomes, cost effectiveness, and
delivery of customer–centered services to job seekers and employers. The Connecticut Department
of Labor (CTDOL), in partnership with the Eastern CT Workforce Investment Board (EWIB), is one of
six states that successfully applied for a Round 3 Workforce Innovation Fund grant. In October 2015
CTDOL was awarded $6 million in WIF grant funds from USDOL to implement the four–year Eastern
Connecticut Manufacturing Pipeline Initiative. The project seeks to address a massive need for
skilled trade workers at Electric Boat (EB) and other business members of the Eastern Advanced
Manufacturing Alliance (EAMA) by providing short–term training to unemployed and underemployed
workers unable to attend longer–term training. EB expects to hire 350 participants who complete the
program, with EAMA members hiring most of the additional 75 completers. The Pipeline Initiative
enhances strategic collaboration and alignment of workforce development and partner programs and
strengthens the quality of American Job Center services, representing a cornerstone of
Connecticut’s federally designated Investing in Manufacturing Communities Partnership strategy.
The project will be operated locally by EWIB, partnering with CTDOL, EB, EAMA employers, CT
Department of Rehabilitation Services, CT Board of Regents for Higher Education, Quinebaug
Valley Community College, CT Department of Economic and Community Development, Three
Rivers Community College, CT Technical High Schools, EASTCONN, and Employment & Training
Institute. The Eastern Connecticut Manufacturing Pipeline Initiative aligns with the intent of the
Workforce Innovation Fund to: 1) enhance strategic collaboration and alignment of workforce
development and partner programs by targeting the identified needs of regional employers through
customized training, aligning training and employment services with available jobs, and expanding
employer commitments to hire program completers; and 2) strengthen the quality of American Job
Center services by increasing use of high–quality skills assessment tools and case management
methods, and working directly with employers to identify training needs in growing industry sectors,
aligning with WIOA priorities. Advanced Manufacturing Centers As a result of the 2011 Jobs Bill,
State bond funds were committed to establish three new community college–based Advanced
Manufacturing Centers, modeled on the successful Manufacturing Machine Technology Program at
Asnuntuck Community College (Enfield). The new centers opened in August 2012 at Housatonic
Community College (Bridgeport), Naugatuck Valley Community College (Waterbury) and Quinebaug
Valley Community College (Danielson). Their mission is to offer a variety of credit and non–credit
advanced manufacturing courses for incumbent workers, displaced workers, returning veterans,
current community college students, adult education students and high school students from both technical and comprehensive high schools. Overall program coordination is provided through the Board of Regents for Higher Education. Students earn a one–year/two–semester Advanced Manufacturing Certificate, plus 576 hours of related instruction toward an Apprenticeship in manufacturing, as well as the OSHA 10 certificate. Manufacturers/employers are intensively involved in all phases of program planning, design and implementation, through advisory boards at each Center and through a Statewide Advanced Manufacturing Advisory Committee (SAMAC). Graduates can acquire a minimum of 4 National Institute of Metal Skills (NIMS), towards the 11–credential Machine Level I NIMS certificate. Recent enrollment data shows 323 students had enrolled across the four Centers in Fall 2013; 213 had graduated by June 2014; 86 students participated in internships; 192 students were employed in Summer 2014; and 331 students enrolled in Fall 2014. Manufacturing companies employing the most program graduates represent tool and die, aerospace, stamping, automotive, medical device, plating, molding, construction, commercial lighting, and general manufacturing. As of June 2014 graduates of the four Centers had a 90% job placement rate. Connecticut Advanced Manufacturing Initiative In September 2014 the US Department of Labor awarded a $15 million grant to implement the Connecticut Advanced Manufacturing Initiative (CAMI) across the 12 community colleges and Charter Oak State College. CAMI builds on the foundation of the nationally recognized Advanced Manufacturing Technology Centers, and expands post–secondary manufacturing education to every community college in Connecticut. Grant funds pay for capital equipment to construct labs, purchase equipment, develop curricula, provide hands–on training, hire new teachers and educational assistants, and the development of new registered apprenticeships for high–demand manufacturing jobs. Manchester Community College serves as lead college of the multi–college CAMI consortium.

Natural Gas Transmission Workforce Initiative Connecticut’s Comprehensive Energy Strategy was produced in 2013. A key feature is the emphasis on moving to natural gas, as a lower–cost, cleaner, more reliable foundation for Connecticut’s future energy needs. It lays out a game plan to expand natural gas access to 300,000 Connecticut homes, businesses and other customers. That $7 billion gas conversion will create demand for a substantial number of skilled workers qualified to build the new natural gas pipeline infrastructure. Workers will be needed across a spectrum of construction services, including civil, construction and operating engineers, logistics, project managers, laborers, pipe fitters, inspectors and safety professionals. To ensure that state companies and the workforce is ready, Connecticut Construction Industries Association (CCIA) President and CEO (and CETC Chair) Donald Shubert convened a Natural Gas Transmission Workforce Committee, including representatives of the three investor–owned utilities, the Natural Gas Association (NGA), CCIA, contractors, organized building trades, Connecticut Department of Labor, Department of Economic and Community Development, WDBs and the Connecticut Technical High School System. Initially the committee completed an inventory of all skills required for the jobs and tasks, to ensure contractors know what is needed to train and certify workers involved in the gas conversion. Subsequently, representatives of the utilities and NGA collaborated to develop specific requisite contractor and workforce qualifications needed to perform gas conversion work under Federal operator qualification (OQ) regulations. These efforts led to development of a covered task list for OQ in Connecticut (and also in New York, New Jersey and the rest of New England). This initiative contributes to efforts of apprenticeship training programs, Jobs Funnels, training providers and contractors to align training efforts and create a pool of companies and workers qualified to perform the impending gas conversion work in Connecticut. Participants in the Natural Gas Transmission Workforce Initiative intend to work together going forward to ensure that Connecticut companies have the skilled and qualified workers needed to perform the pipeline expansion as it comes on line over the next decade.
Energy Management Tunxis Community College’s (TxCC) Energy Management program is a unique, career-oriented two-year Associate of Applied Science degree that trains students to evaluate energy use patterns; develop, implement, market and maintain conservation programs; perform public outreach; recommend energy efficiency techniques; integrate alternative energy sources; and perform systems analysis to solve problems. Students learn to apply basic physics and analytical techniques to measure and define energy use of today’s building systems with the goal of evaluating and recommending alternative energy solutions that will result in greater energy efficiency and lower energy costs. The program prepares undergraduate students and working age adults for energy analysis jobs in the commercial and industrial (C&I) energy sector. Students need no prior experience to succeed in the program. The program will help meet the need for well-trained commercial energy conservation workers in CT and in the Northeast US. TxCC’s commercial energy program is modeled after Lane Community College’s Energy Management Program, in Eugene, OR. Lane’s program is internationally known, attracts undergraduate students and adult students from across the US, and has been running since 1980. Lane’s Director of Energy and Water Programs provided program development assistance for the TxCC program. Next Generation Connecticut. The Next Generation Connecticut initiative is intended to significantly expand educational opportunities, research and innovation in the science, technology, engineering and mathematics (STEM) disciplines at the University of Connecticut. The broad objective is to leverage UConn’s strengths and resources to help build Connecticut’s future workforce, create jobs and invigorate the state economy. The cornerstone of the effort is a major increase in student enrollment, faculty expansion, development of facilities for enhanced STEM research and teaching, and expansion of critical programs at UConn’s Hartford and Stamford campuses. Next Generation Connecticut aims to transform UConn into an elite public research institution, fueling Connecticut’s economy with new technologies, training highly skilled graduates, creating new companies, patents, licenses and high-wage jobs. Components include: hiring research and teaching faculty in STEM disciplines; building research facilities for materials science, physics, biology, engineering, cognitive science, genomics and related disciplines; constructing teaching laboratories; creating a STEM Honors program to attract high achieving undergraduate students; upgrading aging infrastructure; expanding Stamford degree programs; providing student housing in Stamford; and relocating the Greater Hartford campus to downtown Hartford. This aggressive investment hopes to dramatically increase UConn STEM research and graduates, producing innovations and inventions contributing directly to sustainable economic growth in Connecticut, with high-wage jobs for a STEM-skilled and educated workforce. Connecticut Health and Life Sciences Career Initiative In Connecticut, the health and life sciences represent an area of significant strategic growth supported by both public and private investment. The Connecticut Health and Life Sciences Career Initiative (HL–SCI) is designed to prepare workers to take on these new jobs with a particular focus in recruitment on veterans, TAA-eligible workers (those displaced by foreign trade), dislocated, unemployed and under-employed workers. Through a consortium of five community colleges (Norwalk, Capital, Gateway, Manchester and Middlesex), nineteen (19) new Certificate and Associate Degree programs have been established and forty-four (44) existing programs have been revised with industry support to ensure that students have the skills needed to succeed and that jobs will be waiting for graduates. Sixty (60) new online/hybrid courses have been created to increase flexibility and access for students and speed acceleration to graduation. Partnerships with employers for student internships and placement services provide a competitive edge for HL–SCI graduates who complete programs with hands-on experience and an understanding of workplace expectations. The initiative also includes a commitment to stacked and latticed credentials to maximize options for students. Eastern Connecticut State University is part of the consortium to ensure that graduates of HL–SCI programs have pathways to 4-year institutions – both public and private – and to create new articulation agreements between consortium community colleges and Eastern Connecticut State University.
Regional Economic Development Forums

The CT Department of Economic and Community Development and The CT Economic Resource Center will conduct ten (10) Regional economic Development Forums throughout the State during the spring. Commissioner Catherine Smith will introduce the regional point of contact from DECD and discuss the state's new initiatives to fuel job growth – while CERC will present an overview of new business and municipal resources for economic growth. These events will also provide an opportunity for Q&A and a discussion on how we can further work together to foster economic development success. Developing Future Talent

Hartford Opportunity Youth Collaborative

The Hartford Opportunity Youth Collaborative brings together leaders and stakeholders from key systems – education, youth development and workforce development – to improve outcomes for “opportunity youth”, defined as 16–24 year olds lacking a high school diploma, or who have a diploma but are not in school and not working, estimated at 6,000 youth in Hartford. This effort is one of 21 grantees nationally of the Aspen Opportunity Youth Incentive Fund. A collective impact approach is used to demonstrate best practices to improve outcomes and scale-up effective practices across systems. The resulting comprehensive plan is expected to decrease the number of Hartford youth disconnected from education and employment. Success indicators are post-secondary credentials and/or two- and four-year degrees obtained, and securing employment in targeted sectors/career field. Capital Region Education Council offers contextualized learning to prepare justice-involved high school dropouts for the GED, offering industry credentials and internships. Blue Hills Civic Association partners with Capital Community College to offer an enhanced certificate and associate degree program for allied health careers, with Success Coaches creating individual service plans and offering financial aid counseling. Our Piece of the Pie partners with Asnuntuck Community College to deliver contextual learning including occupational skills instruction in manufacturing, welding and electronics, leading to certificates relevant to manufacturing careers. Jobs for America’s Graduates

Jobs for America’s Graduates (JAG) is a state-based national program dedicated to preventing dropping out of school by youth who are most at-risk. JAG operates in 31 states, and in more than three decades has delivered consistent, compelling results. Key outcomes nationally include a 91% graduation rate, doubling the rate that at-risk youth get jobs, and tripling the rate at which they get full-time jobs. JAG JAG professional-skills curriculum as a one-credit elective course. The program focuses on personal engagement and accountability, education and training needed for in-demand careers, and employment. JAG also includes mentoring, project-based learning, community engagement and 12 months of post-graduation follow-up. Currently JAG is being operated in six CT high schools serving 208 students. Early College Programs

The label “early college” program encompasses various models focusing on the transition of high school students to college and into the workforce. The premise of the early college strategy is that all high school students should pursue some form of post-secondary education, recognizing that multiple pathways lead to success. The mix of strategies under the early college umbrella ranges from individual high school students taking college courses in a college setting or at their home high school, to high schools where all students graduate with an industry-validated certificate or associate’s degree, with multi-year curriculum pathways, supports and experiences. Some early college programs focus exclusively on academics and college readiness, while others emphasize career pathways and exposure to career options. Successful early college programs rely on collaborations and partnerships among school districts, high schools, community colleges, universities and businesses and employers.

Early college initiatives have proliferated in Connecticut, reflecting these strong partnerships. Examples of innovative efforts with continued potential for replication include: Connecticut Early College Opportunities CT–ECO) programs including at the Norwalk Early College Academy; Danbury Early College Academy; Windham Early College Opportunities; New London Early College Opportunities program; Asnuntuck Community College Fifth Year Program with East Granby School System; Waterbury Career Academy partnership with Naugatuck Valley Community College; Fundamentals of Early Childhood Education program of the Meriden School District and Middlesex
Community College; and, Manchester Community College’s College Career Pathways program. It is anticipated that these and similar early college efforts will expand going forward. CT– ECO Programs In February 2014 in the State of the State address, Governor Malloy highlighted the IBM P–TECH model by name as an example of effective career education and a promising new model of high school and postsecondary education. In April, 2014 Governor Malloy announced collaboration with IBM to launch the state’s first P–TECH model school in Norwalk, Connecticut. This partnership includes Norwalk High School, Norwalk Community College and IBM who developed a new 9–14 school that would provide students with an enriched curriculum to complete both a high school diploma and a cost–free AAS degree, aligned with actual employment opportunities at IBM. Students would have professional mentors, substantive workplace experiences and internships. Graduates would be first in line for job openings at IBM.

Three additional CT–ECO programs opened their doors in the Fall of 2015: Danbury ECO is a partnership between Danbury Public Schools, Naugatuck Valley Community College, and NewOak and Pitney Bows and the Eastern CT–ECO Programs. The Eastern CT–ECO programs are part of a region effort in the eastern portion of the state aimed at creating a pipeline of talented workers for the many manufacturers in the region. As such, both programs share the Eastern Advanced Manufacturing Alliance (EAMA) with General Dynamic Electric Boat serving as the lead as an industry partner. The Eastern CT–ECO programs were a key component in the successful Federal ICMP designation application. The two Eastern Connecticut programs are: New London ECO which is a partnership with New London Public Schools and Three Rivers Community College; and Windham ECO which is a partnership with Windham Public Schools and Quinebaug Valley Community College. CT–ECO offers participating students an integrated high school and college program that aims for each student to graduate with an AAS or AS degree at no–cost to them. CT–ECO programs further prepare students with the skills and knowledge necessary to step seamlessly into well paying, high potential jobs in STEM fields. Waterbury Career Academy Following several years of planning by community leaders, educators, workforce system representatives and local businesses, construction began in 2011 on the $65 million state–of–the–art facility for the new Waterbury Career Academy, a public high school with a curriculum intended to address the workforce priorities of industry in Waterbury and surrounding municipalities for talented, educated, skilled future employees. The Academy operates within the Waterbury Public Schools system. Responding to demands of local businesses and employers, four educational strands focus academic/classroom instruction and career readiness preparation: Computer Information Technologies, Engineering/Manufacturing Technologies, Human Services, and Health Services. Industry partners helped to establish and serve on Advisory Panels to assist with curriculum development, student selection criteria, and ongoing technical assistance and support. The Academy opened in September 2013, welcoming an initial class of 9th grade students. Grade 9 students explore each of the four strands before choosing an area of focus. Each strand offers three career pathway options: employment following high school graduation with one of several certifications; two–year community college degree track with college credits; four–year college degree track with college credits. Honors and Advanced Placement courses are offered to qualifying students. World language courses are offered. The Academy has an articulation agreement offering eight (8) dual credit courses with Naugatuck Valley Community College. All 10th grade students have the opportunity to earn at least 3 college credits in their chosen strand.

Summer Youth Employment Program Connecticut’s five regional WDBs strive to offer youth aged 14–20 meaningful employment experiences. Various national studies document the positive impact of structured work experience on academic performance and earnings. Since 2007 between 4,300 – 7,400 young people annually have been able to participate in the state’s Summer Youth Employment program, coordinated statewide by the WDBs. In FY 2015, the Sumer Youth
Employment program was supported by $5.5 million in State funding, $637,500 from the Department of Children and Families, and a variety of leveraged private funds totaling nearly $1.9 million. Unfortunately no Federal funding has been available to support the summer jobs program since 2010. In summer 2014 a total of 5,025 youth participated. For many it was a first job. This was a modest reduction from the 5,270 participants in summer 2013, due to a combination of reduced leveraged funding, the increased minimum wage, and placement of some youth in year–round employment–based programs. The larger underlying story is the fact that more than 6,600 eligible Connecticut youth were unable to participate in 2014 due to limited funding and resources. Manufacturing Mania October 2015 marked the third annual Connecticut. Dream It. Do It. Manufacturing Month, proclaimed by Governor Malloy to recognize the importance of the manufacturing industry to Connecticut and showcase manufacturing career opportunities statewide to middle school students, their teachers, counseling staff and parents. With advanced, computer–driven tools and streamlined, clean and brightly lit facilities, manufacturing today is more advanced than ever before. So too are the talents, skills and teamwork required of the next generation of Connecticut’s manufacturing workforce. College Readiness and Completion – Implementation of Public Act 12–40 In 2012 the General Assembly enacted Public Act 12–40: An Act Concerning College Readiness and Completion. The law addresses the challenge of having many recent high school graduates unable to qualify for college credit courses upon registering at the state’s community colleges, and the limitations of remedial instruction strategies. PA 12–40 was intended to match developmental education with the capabilities of incoming community college students, and requires alignment of high school curricula with Common Core Standards. Community colleges were allowed significant latitude in creating courses to meet the new law’s requirements. The legislation outlined a three–tiered structure colleges could use to provide developmental instruction: • Embedded: College–level instruction, with embedded developmental support designed for entering students with 12th grade skills (or close), who are approaching college readiness but require modest remediation. • Intensive: One semester of developmental education instruction or an intensive readiness experience for entering students with skills below the 12th grade level. • Transitional: For students who test below the intensive level of readiness. Student Success Center In March 2014 the Board of Regents for Higher Education won a $500,000 grant from the Kresge Foundation to establish a statewide Student Success Center, working across Connecticut’s twelve community colleges, to help more low–income, first–generation and under–represented students complete college and earn degrees or certificates. Connecticut is one of seven states to establish these centers. Based at Norwalk Community College, the Student Success Center serves as a statewide hub to support access to, retention in, and graduation from college, promoting effective strategies to encourage persistence and degree completion. The Center has access to cutting edge strategies across the country and promotes coherence and cohesion between policy and best practices, fostering collaboration among college students, faculty, administrators and staff, to develop a culture of academic and personal success for students as they work towards degree and certificate completion. Tomorrow’s Framework Strategic Action Plan – CT Technical High School System The Connecticut Technical High School System (CTHSS) statewide system of 16 diploma–granting technical high schools and one technical education center serves approximately 10,800 full–time high school students annually, offering education and training in 36 occupational areas. CTHSS also serves approximately 5,500 part–time adult students annually in apprenticeship and other programs. In recent years CTHSS has received considerable attention as a valued asset in addressing the state’s workforce priorities in critical occupational areas of need. Connecticut’s 2012 education reform legislation established a new CTHSS Board, including representatives of businesses and partnering state agencies, to promote and guide CTHSS strategic development. In 2014 Dr. Nivea Torres was appointed Superintendent. Under the leadership of the Board and Superintendent, CTHSS collaborated with numerous partners to develop the Tomorrow’s Framework Strategic Action Plan 2014–2017 addressing the CTHSS mission of providing a world
class career technical and academic education to prepare students for careers in business and industry. Tomorrow’s Framework’s goals are to: partner with business and industry in developing career technical education providing students the skills and work habits to succeed in a dynamic 21st century work environment; align K–12, post–secondary and adult programs in a continuum of educational services resulting in career and college readiness; transform CTHSS via programs responsive to Connecticut’s workforce needs, positioning the system as a leading force in career technical education; and, invest in developing faculty and staff to support the core CTHSS mission. Those goals build on fourteen foundational imperatives, establishing a strategic direction, addressing expectations of students, emphasizing program quality, and focusing on STEM skills, employer responsiveness, structured career exposure for students, strength of faculty and staff, visibility and collaboration.

CTHSS Central Office leadership, CTHSS schools principals and CTHSS faculty are actively engaged in a wide range of partnerships and collaboration with employers, post–secondary institutions, K–12 schools, workforce agencies and others, to meet the aggressive goals set out in the action plan. Much has already been accomplished. Going forward these efforts and partnerships will become increasingly important elements of the state’s broad workforce development strategy, particularly in occupations in critical industries demanding specific technical skills.

Connecticut Center for Arts & Technology (ConnCAT) The Connecticut Center for Arts and Technology (ConnCAT), is modeled after Pittsburgh’s highly successful Manchester Bidwell Corporation – an internationally recognized arts and education center founded by the renowned innovator and MacArthur Fellow, Bill Strickland. The mission of ConnCAT is to inspire, motivate, and prepare youth and adults for educational and career advancement, through after–school arts, and job training programming. Training opportunities are available to all people, without regard for race, religion, ancestry or national origin. ConnCAT provides job training programs designed to give unemployed and under–employed adults the skills needed to secure meaningful, well–paying jobs in health sciences and culinary professions, and the academic support required for success in those programs. ConnCAT career preparation links adult learners with local corporate partners in healthcare and hospitality services who assist in curriculum design and encourage entry level employment for adult learners upon program completion.

Cradle to Career – Collective Impact Movement to Strengthen Outcomes for Children and Families Across the country, local stakeholders, practitioners, policy makers and funders are recognizing the need to work in new ways to solve complex social issues. This new way of working, coined “Collective Impact” is rooted in broad and authentic, cross–sector, community engagement and the idea that local stakeholders need to be part of the solution.

In Connecticut, four urban communities (Stamford, Norwalk, Bridgeport and Waterbury) have launched Cradle to Career movements using the nationally recognized, evidenced–based StriveTogether Collective Impact framework.

The conditions of Collective Impact include: • Development of Common Agenda/Community Vision that Encourages Alignment • Evidenced–based/Data Driven Decision Making • Collaborative Action with Commitment to Continuous Improvement • Advocating for, and Investing in, What Works • Sufficient, Dedicated Backbone Support

Each StriveTogether Cradle to Career Collective Impact community in Connecticut has determined specific outcomes their community would like to work to improve. These outcome areas include; Infant Health, Kindergarten Readiness, Third Grade Reading, Middle Grade Reading and Math, High
School Completion, Reduced Exposure to Violence, Post–secondary Enrollment and Completion, and Youth Jobs/Employment.

Jobs Corps Job Corps is a national, federally funded educational and vocational training program administered by USDOL that helps low income youth (ages 16–24) gain workplace skills, train for high–demand occupations, and become independent and self–sufficient. With centers in Hartford and New Haven, more than 400 students enroll each year to earn a high school diploma or GED, learn a trade, obtain third party certifications and receive assistance finding a job. CTDOL has an assigned staff member who provides on–site support to the Hartford and New Haven Job Corp Centers. Transforming System Capacity Disability Employment Initiative In October 2013 Connecticut was one of eight states to receive a grant through the U.S. Department of Labor’s Disability Employment Initiative (DEI). CTDOL’s Office of Workforce Competitiveness (OWC) administers the three–year $3,058,706 award from USDOL’ s Employment and Training Administration and Office of Disability Employment Policy. Broad objectives are to provide additional education, training and employment opportunities for individuals with disabilities, and to expand the workforce system’s capacity to serve eligible beneficiaries in the Social Security Administration’s Ticket to Work Program. The initiative features strong partnerships and collaboration among key agencies; service coordination through an Integrated Resource Team; integrated services and resources, including blended, braided and leveraged funding and resources; and, innovative asset development strategies. Services are offered in two of Connecticut’s workforce regions. Two participating WDBs employ Disability Resource Coordinators to implement project activities and coordinate services. Integrated Resource Teams address individual needs and provide increased support for jobseekers with disabilities. Partners include CTDOL’s Office for Veterans Workforce Development and the Departments of Rehabilitative Services, Labor, Education, Mental Health and Addiction Services, Social Services, Transportation, and various other public and private sector representatives.

DEI efforts focus on: • Promoting inclusiveness of individuals with disabilities to enhance competitive advantage • Organizing business–to–business forums to share strategies on recruiting, hiring and retaining people with disabilities • Creating employer/service provider partnerships to develop internships and strengthen connections for ongoing collaboration • Improving service coordination among American Job Centers and partner agencies • Increasing transportation alternatives and awareness of transportation resources • Improving staff knowledge of employment’s impact on benefits individuals with disabilities • Upgrading assistive technology software and technologies • Providing sensitivity training for staff regarding LGBT jobseekers with disabilities • Advocacy for state–level change (e.g., expanding Medicaid waiver option) Anticipated outcomes include increases in the rates of individuals with disabilities who get and retain jobs; increased wages; increased number of persons with disabilities served by the One–Stop system; increased number of participants earning industry–recognized credentials; and, increased number of individuals with disabilities co–enrolled with One–Stop partners.

Senior Community Service Employment Program A Senior Community Service Employment Program funded under Title V of the Older Americans Act through the U.S. Department of Labor enables us to provide job skills training to low–income Individuals, age 55 and older in Connecticut. Ready to Work participants are placed in temporary training assignments where they gain valuable on–the–job work experience and training needed to gain meaningful employment. Participants will work 20 hours a week at the training sites for which they will be paid minimum wage. Goals • To assist participants in acquiring marketable jobs skills and • To help participants secure meaningful unsubsidized employment Program Objectives • Participate in community service assignments to learn new skills in on the job training • Assistance in resume development • Assistance in developing
job search skills • Increase opportunities to obtain jobs in the private sector • Referrals to supportive services as needed • Change stereotypes about older workers through public education and demonstrated success Workforce 18.9 percent of the civilian workforce in Connecticut consists of residents, age 65 and older (US Bureau of Labor Statistics: 2010). The Senior Community Service Employment Program (SCSEP) assists workers age 55 years and older prepare for today’s job market and re-enter the workforce through on-the-job training at local non-profit agencies and classroom training, including, but not limited to, Dress for Success, assistive technology and transportation. P20 WIN Data Sharing System Connecticut's Preschool through Twenty and Workforce Information Network – P20 WIN – represents a groundbreaking approach to education and workforce training-related data sharing in Connecticut. P20 WIN provides a secure data vehicle producing critical information to understand patterns over time and inform policy and strategy decisions to improve outcomes of education and training programs for Connecticut students. With P20 WIN, Connecticut can evaluate how well public education and training programs prepare students for additional education and careers in Connecticut. The Connecticut State Department of Education (CSDE), Board of Regents for Higher Education (BOR), the University of Connecticut (UCONN), the Connecticut Conference of Independent Colleges (CCIC) and Connecticut Department of Labor (CTDOL) are the State entities actively participating in P20 WIN. An inter-agency data governance structure and data sharing agreements support collaborative decision-making about data access and use. P20 WIN provides a systematic, secure and repeatable process to gather and analyze critical data to understand the impact of investments in education and workforce training programs, leading to better outcomes.

Workforce Development Boards’ Initiatives The following link provides examples of Connecticut’s Workforce Development Boards leadership in attracting funds to support Connecticut’s workforce development efforts across the education and training continuum and the willingness of the WDBs to play a critical intermediary role in the efforts led by higher education and workforce system partners.

http://www.ctdol.state.ct.us/OWC/WIOA%20USP%20WDB%20Initiatives.docx

The following bullets highlight just a few of the projects that have achieved national recognition and/or replication and involved a high level of collaboration among multiple Connecticut WDBs. • The $2 million CT STEM Jobs grant project, one of only five USDOL “STEM Opportunities in the Workforce System” pilot grants nationally, was the first federal grant project that involved all five Connecticut WDBs, along with higher education, economic development, and industry partners. CT STEM Jobs earned national recognition for innovative approaches that placed 758 unemployed workers into jobs despite occurring during a period in which Connecticut lost close to 60,000 jobs. • The five Connecticut WDBs led the on-the-ground implementation of the $5.8 million USDOL Connecticut Green Jobs Funnel Initiative (CGJFI) received by the CTDOL Office of Workforce Competitiveness. The CGJFI involved the replication of Capital Workforce Partners’ nationally-recognized Jobs Funnel model to all five Connecticut workforce areas. The CGJFI trained 1,390 people (154% of goal) and placed 887 people in employment (154% of goal). • The WorkPlace Inc.’s Platform to Employment (P2E) program began in Southwest Connecticut in 2011 with private funding as an innovative solution to help the long-term unemployed get back to work. Based on the success of P2E in Southwest Connecticut, the Connecticut General Assembly appropriated $3.6 million in 2014 to create the first statewide P2E program in the nation. Nearly 80% of Connecticut participants who complete the preparatory program take the next step into a work experience at a local company. Of this population, nearly 90% have moved to employer payrolls. Based on this success, P2E has expanded to several national markets. • The Eastern Connecticut Manufacturing Pipeline Initiative utilizes a $6 million USDOL Workforce Innovation Fund award to implement and bring to scale a demand-driven, customized training program recognized by U.S. Labor Secretary
Thomas Perez as an innovative model ripe for national replication. The recently-launched Pipeline Initiative will help to address a massive need for skilled trades workers at Electric Boat and other members of the Eastern Advanced Manufacturing Alliance by providing a short-term training option to unemployed and underemployed workers unable to attend longer-term training. Employment First State Leadership Mentoring Program In November 2015, Connecticut was one of four states selected to participate as a Core State in the 2016 Employment First State Leadership Mentoring Program (EFSLMP) offered through the U.S. Department of Labor, Office of Disability Employment Policy (ODEP).

Connecticut was chosen through an application process to become an EFSLMP Core State. Connecticut committed to a cross-system, cross-disability effort to promote Employment First, a national movement in both philosophy and policy stating that employment is the first priority and preferred outcome of individuals with disabilities.

Two workgroups were formed, comprised of leadership representing six state agencies including the Departments of Labor, Developmental Services, Rehabilitation Services, Education, Mental Health and Addiction Services, and Social Services, as well as key stakeholders including the CT Council on Developmental Disabilities and the CT Business Leadership Network. These workgroups receive a combination of virtual and onsite mentoring, intensive technical assistance, and training from a national pool of subject matter experts under the program. One workgroup is focused on coordinating and streamlining business engagement and outreach strategies across government agencies and providers. A second workgroup required under the program called Vision Quest, is charged developing and implementing policy to support the state’s Employment First systems change efforts.

**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.

The preceding discussion of Connecticut’s workforce development activities (pages 26–38) addresses an inventory of selected noteworthy initiatives, programs, and services responsive to the goals that serve as the focus for this Unified State Plan: Supporting Business Growth; Strengthening the Current Workforce; Developing Future Talent; and Transforming System Capacity.

The process of developing Connecticut’s Unified State Plan included review of the Strengths, Weaknesses, Opportunities, and Threats: Aerospace and Marine Shipbuilding in Connecticut’s Advanced Manufacturing Communities Region prepared by the Connecticut Department of Economic and Community Development, as well as several other information sources summarized below.

In 2014 OWC engaged members of the Connecticut Employment and Training Commission (CETC) Career Advancement and Youth Employment committees to review statewide efforts to develop the coordinated career pathways system collectively envisioned by USDOL, the US Department of Education and HHS. Committee members participated in a joint working session to share insights. An information session was held with officials coordinating workforce initiatives in the state’s public college and university system. A survey was disseminated to key stakeholders on the challenges and opportunities associated with career pathway strategies and similar efforts. Collectively, the knowledgeable individuals engaged in this information review process represented employers,
Workforce Development Boards, key state agencies, community colleges, adult education providers, Regional Education Service Centers, community–based service providers and philanthropy. The assessment they produced informs this Unified State Plan, as it examines workforce activities relevant to the objective of building a career pathways system as a key feature of State workforce strategy under WIOA.

Additional information on perceived strengths and weaknesses was derived from the “State Plan Addressing Contextualized Learning, Early College and Career Certificate Programs” produced by CETC in 2015. In addition to the information generated by these CETC–sanctioned analyses, OWC staff reviewed the output produced by the various WIOA Transition Work Groups during the recent state planning process to extract insights concerning workforce development activities.

The following summary addresses perceived strengths and opportunities for improvement:

Strengths

Given the knowledge, experience and expertise of its key partners and stakeholders, Connecticut’s workforce system is well positioned to implement innovative workforce and talent development strategies.

Connecticut’s workforce development efforts are supported and encouraged by the strong relationships among executive leadership in key State agencies and key administrative and program staff in each organization.

State, regional and local partners have a demonstrable track record of successful collaboration on applying for and winning significant national competitive grant awards that address strategic priorities, developing innovative partnerships responsive to employer priorities, and effective sharing of information and best practices, i.e. the Disability Employment Initiative and The American Apprenticeship Initiative.

The role of the local workforce Development Boards (WDBs) – collaborating with CTDOL, other key State agencies and numerous local partners and stakeholders – is a key asset in Connecticut’s ability to develop innovative strategies, programs and services responsive to the needs of jobseekers, workers and employers. The WDBs and their partners have developed numerous effective programs, shared successful efforts and adjusted strategies as results dictate.

Connecticut has been generating increasingly useful labor market information and program outcome data emerging from the Preschool Through Twenty and Workforce Information Network (P20WIN) system and associated working groups and partnerships among key state agencies.

Connecticut’s workforce system enjoys a range of positive experiences in working closely with employers – large and small – as partners and customers in key industries/sectors at both the State and local level.

The business community and employers play a strong role in providing leadership to the local Workforce Development Boards (WDBs) and the Connecticut Employment and Training Commission (CETC).

Connecticut is blessed with a diverse array of public and private postsecondary/higher education institutions that serve as a foundation for numerous workforce/career development initiatives responsive to the needs and priorities of Connecticut businesses and employers.
Connecticut has an extensive network of committed, mission-driven, effective community-based organizations and non-profit service providers delivering effective on workforce programs and services accessible to key target populations.

Connecticut has an active philanthropic sector that is increasingly engaged in supporting workforce development-related initiatives, including local community foundations, local United Ways and corporate foundations.

Our ability to provide effective innovative workforce development services depends on continuing effective communication among State and local partners and stakeholders, including those who will serve together as members of the CETC Committees and Work Groups going forward.

Continuing effective communication between CETC and the local Workforce Development Boards will be essential to ensure a process is in place to refine and adjust strategy towards continuous improvement and enhanced system performance.

Across Connecticut are numerous examples of workforce programs that strive to address the essential components of a comprehensive approach to career pathways responsive to employer needs and focused on good career opportunities: alignment across program and “sub-system” silos; rigorous, sequential coursework integrating education and work-based training; flexible entry/exit; comprehensive support services; financial support; engagement with targeted businesses and industry sectors; credit for prior learning and opportunity for accelerated advancement; flexible scheduling; innovative use of technology; attainment of industry-recognized credentials; industry sector focus and advancement opportunities; and, creative collaboration among stakeholders to achieve results.

A number of key weaknesses were identified during the WIOA USP planning process, and in recent planning efforts that produced formal public reports/papers (CETC Response to Career Pathways RFI; Plan to Provide Education, Training and Job Placement in Emerging Industries). Presently, consistent with and based upon the informal analysis conducted to date, the State identifies the following weaknesses requiring attention and action going forward:

- Over reliance on individual leaders among key partner agencies and stakeholder organizations at all levels of Connecticut’s workforce system
- Lack of sufficient financial resources and focused time to be able to build deep partnership relationships across stakeholder organizations
- Multiplicity of funding mechanisms, with differing (often conflicting) program eligibility requirements, outcome measures, and reporting requirements.
- Inflexibility of program-specific categorical strings that limit opportunities for innovation and responsiveness in designing effective strategies
- High unit cost of innovative strategies and consequent limitations of numbers of customers who can be served
- Lack of work-readiness “soft skills” of many prospective candidates for participation in available workforce programs
• Volume of prospective candidates for participation in workforce programs who have criminal records

• Inadequacy of assessment tools used to match participants with effective workforce strategies

• Lack of consistent system-wide program quality standards to inform investment decisions to fund effective programs

• Fragmented, inconsistent staffing at many nonprofit service providers due to unpredictable program funding, lack of continuity and low wages

• Inconsistency among businesses and employers to participate effectively as partners in workforce development initiatives

• Limited capacity of many workforce service providers to deal effectively with the complexities of braiding funds

From September-December 2016, the CETC Planning and Performance Accountability Committee will review the identification of workforce activities weaknesses, for updating in the 2017 CETC Annual Plan.

C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

Connecticut’s capacity to implement proposed workforce development activities and provide coordinated, aligned, integrated, comprehensive workforce development programs and services to jobseekers, workers and employers is strong, and improving.

Over the past five years Governor Malloy has supported a series of initiatives and investments to address Connecticut’s workforce challenges, ranging from early childhood development, to strengthened career and technical education, to industry-specific enhancements in higher education, to focused training for targeted workers. Likewise, the General Assembly has raised the broad workforce development, education and training agenda to a new level of attention and support through an array of investments in innovative programs. Many of these workforce development activities are described in the preceding section. Connecticut businesses and employers have increased their active support for and participation in numerous practical partnerships to help build the skills of the workers they need for their companies to prosper.

The capacity of Connecticut’s workforce system to meet the challenges ahead is manifest in numerous examples. At both State and regional/local levels, an array of sector-specific workforce partnerships are in place to prepare targeted jobseekers and incumbent workers to meet employers’ needs. The statewide network of comprehensive One-Stop Centers and satellite offices provides accessible facilities and presence in key communities. The P20WIN longitudinal data system provides increasingly useful information to guide system investment strategies.

The Connecticut Employment and Training Commission (CETC), the State Workforce Board, Office of Workforce Competitiveness (OWC), and key system partners worked diligently to develop this
Unified State Plan and prepare for continuous system improvements and effective service delivery. Guided by business leader Donald Shubert and Lt. Governor Nancy Wyman, CETC has a business sector majority, and includes the Commissioners of State agencies responsible for core WIOA programs (Labor, Education, Rehabilitation Services), plus key State agencies responsible for other elements of the larger system – including the Department of Social Services (TANF and SNAP E&T), Department of Economic and Community Development, and Board of Regents for Higher Education (community colleges and public universities). Partnerships reinforced through CETC at the State–level will help drive implementation of the Unified State Plan system–wide.

Connecticut’s workforce system has the capacity to implement the various strategies described in the next section of this Unified State Plan across the four goals of supporting business growth, strengthening Connecticut’s current workforce, building the future workforce, and transforming system capacity. Strategies to be pursued specifically to improve system capacity (identified and discussed on pages 43–45) include: • Re–imagining delivery of customer services • Cross–entity/cross–program functional partnerships • Regional collaboration between regional workforce boards and community colleges • Transparent performance system • Emphasis on system continuous improvement • State–of–the–art technology to improve cost–effective service delivery

Recent State investments in a portfolio of education, workforce development, job training, adult literacy and youth development strategies to build critical system capacity include: • Advanced Manufacturing Technology Centers $17.8 million • CT Manufacturing Innovation Fund $70 million • Incumbent Worker Training $7.6 million • Apprenticeship $7 million • Platform to Employment $3.6 million • STEP–UP $5 million • I–BEST Adult Education Programs $1.5 million • Second Chance Initiative $1.5 million • CT’s Youth Employment Program $18.5 million

Anticipated challenges that lie ahead and are likely to test system capacity, reinforcing the importance of continuous system improvement, include: • Ongoing State budget pressures and likely reductions in funding to support programs, services and system infrastructure, including a physical presence in key communities. • Service needs of a significant number of young adults entering the workforce lacking the education and skills to compete in the workforce. • The significant number of low–skill/low–wage adults struggling to meet employers’ needs and expectations to be able to compete successfully in the workforce. • Efficient coordination of effective employer outreach and engagement strategies.

Connecticut has the key components of an effective workforce system in place – among State agencies, regional/local partners, businesses and employers and system infrastructure – to do the important work that lies ahead. We have longstanding experience with creative partnerships to achieve shared outcomes. We have a culture of innovation and shared expectations to constantly be doing better – a collective continuous improvement mindset. And now, we have a Unified State Plan serving as a blueprint for collective effort to increase the capacity of our collaborative system to achieve our common vision.
B. STATE STRATEGIC VISION AND GOALS

The Unified or Combined State Plan must include the State’s strategic vision and goals for developing its workforce and meeting employer needs in order to support economic growth and economic self-sufficiency. This must include—
1. VISION

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

Upon taking office in January 2011, Governor Dannell Malloy asserted as a policy priority the VISION that, building on its proud heritage, Connecticut will create and sustain the global economy’s best-educated, most-skilled, highest-productive workforce, capable of pursuing rewarding careers, such that every Connecticut business has access to a qualified, skilled, job-ready workforce. In the ensuing five years the Governor and Connecticut General Assembly have partnered effectively to embrace the critical importance of skilled talent as the essential resource in efforts to grow Connecticut’s economy, create and retain rewarding jobs, and increase opportunities for financial success through productive employment. Over the past four years the fundamental importance of this workforce agenda and vision has gained attention and support across a broad spectrum of state business leaders and policymakers.

From the outset of his administration, Governor Malloy rolled-out a series of wide-ranging initiatives and investments focusing on various aspects of the state’s broad workforce challenges, encompassing early childhood development, strengthened career and technical education, industry-driven enhancements in higher education, innovative apprenticeships, and specialized training for targeted workers. Likewise, the General Assembly has raised the broad workforce development, education and training agenda to a new level of attention and support through an array of investments in innovative programs. With the Governor’s encouragement, the General Assembly adopted several major, innovative, structural policy initiatives that, taken together, create a strong foundation from which to pursue the Governor’s vision. Connecticut businesses have increased their active support and participation in numerous partnerships and initiatives to build the skills of the workers they need for their companies to prosper.

Connecticut’s challenge – and the opportunity WIOA offers – is to ensure that a comprehensive, aligned, integrated workforce development system is in place and sustained into the future to achieve this vision of developing and maintaining the best-educated, most-skilled, highest-productive workforce in the increasingly competitive global

2. GOALS

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

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

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

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

To bring focus to the Governor’s broad vision, the Connecticut Employment and Training Commission – CETC, the State Workforce Board – has adopted four overarching and complementary goals, as a policy and strategic framework for the numerous business sector, government, labor, community–based and non–profit partners and stakeholders engaged in Connecticut’s innovative workforce efforts: • Support Business Growth: Connecticut businesses – particularly those in key industry sectors that drive economic growth – will have access to the skilled, talented employees they need to compete effectively, prosper and create new and rewarding jobs and career opportunities for Connecticut workers. • Strengthen Current Workforce: Connecticut workers will possess the critical skills and credentials needed to prosper and advance in careers that pay well and allow them to support their families. • Develop Future Talent: Connecticut’s young people will be equipped and ready for career and postsecondary success as productive contributors to a vibrant and competitive state economy and in their communities. • Transform System Capacity: Connecticut’s multi–faceted workforce/talent–development system will integrate and align goals, strategies, policies, investments, services, infrastructure and technology for effective, accountable performance.

To accomplish the Governor’s vision and meet these goals, CETC endorses a set of guiding principles for Connecticut’s workforce system, calling on all stakeholders to embrace these principles in the work they do: • Connecticut’s efforts must be business–driven and customer–focused. • Collaboration among partners and stakeholders is essential. • Innovation is crucial, including use of technology and new approaches. • Data and evidence must be used to shape strategy. • Continuous improvement must be a way of life.

The CETC committee that will be responsible for system performance will develop a corresponding set of objectives and measures for ongoing review to support effective system performance and continuous improvement.

DORS Vocational Rehabilitation Services In addition to the overarching goals for Connecticut’s workforce system (outlined above) and the implementation of WIOA–specific goals, the vocational rehabilitation (VR) programs will focus on the goals listed below collectively. These goals have been developed with the full participation and guidance of the State Rehabilitation Councils for both VR programs. Details on these goals are available in the BESB and BRS state plans for vocational rehabilitation and supported employment services included in this Unified State Plan. Goal A: Increase employment opportunities for eligible individuals of the Vocational Rehabilitation Program Goal B: Provide coordinated services to students with disabilities to prepare for careers and postsecondary education after exit from high school. Goal C: Utilize Innovation and Expansion authority to identify services that can benefit groups of individuals with disabilities to increase access to career information, adaptive technology, and credential attainment. Board of Regents for Higher Education The vision for the Connecticut State Colleges and University System is that a continually increasing share of Connecticut’s population will have a high quality post–secondary education that enables them to achieve their life and career goals and makes Connecticut a place of engaged,
globally competitive communities. This vision and the goals stated below align well with the CETC goals including:

Goal 1: A Successful First Year: Increase the number of students who successfully complete a first year of college. Goal 2: Student Success: Graduate more students with the knowledge and skills to achieve their life and career goal. Goal 3: Affordability and Sustainability: Maximize access to higher education by making attendance affordable and our institutions financially sustainable. Goal 4: Innovation and Economic Growth: Create educational environments that cultivate innovation and prepare students for successful careers in a fast changing world. Goal 5: Equity: Eliminate achievement disparities among different ethnic/racial, economic and gender groups.

Temporary Assistance for Needy Families (TANF) In addition to the overarching goals for Connecticut’s workforce system, the following goals are specific to the TANF and the JFES program:

TANF Goals Goal 1: Provide assistance to needy families so that children may be cared for in their own homes or the homes of relatives. Goal 2: End the dependence of needy parents on government benefits by promoting job preparation, work and marriage. Goal 3: Prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies. Goal 4: Encourage the formation and maintenance of two-parent families.

JFES Goals Goal 1: Enable participants, through employment, to become independent from cash assistance by the end of the 21-month time limit established by state law; Goal 2: Enable participants who become independent from cash assistance to remain employed and independent of cash assistance; and Goal 3: Ensure that federally established TANF Work Participation rates are met through employment of participants and engagement of participants in other allowable TANF work activities based on the regional and individual assessments of participants’ needs.

SNAP E & T In addition to the overarching goals for Connecticut’s workforce system, the SNAP E&T program’s primary goal is to assist SNAP E&T participants with work–related activities that will lead to paid employment. SNAP E&T is a voluntary, skills based program with a focus on vocational training. Successful students gain skills needed to find employment or improve employment in the current job market. The resulting outcome is increased self–sufficiency and decreased dependence on public assistance.

### 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.)

| WIOA Performance Measures | Connecticut Proposed & Acceptable State Proposed Goals | ETA Acceptable Final State Proposed Goals | ETA Acceptable Final PY 16 PY 16 PY 16 PY 17 PY 17 WIOA Adults Employment (Second Quarter after Exit) 70.5% Accept 70.5% 72.0% Accept 72.0% Employment (Fourth Quarter after Exit) 69.0% Accept 69.0% 69.5% Accept 69.5% Median Earnings $ 4,800.00 Accept $4,800.00 $ 4,850.00 Accept $ 4,850.00 Credential Attainment Rate 70.0% Accept 70.0% 70.5% Accept 70.5% Measurable Skill Gains Effectiveness in Serving Employers WIOA Dislocated Workers Employment (Second Quarter after Exit) 75.6% Accept 75.6% 76.4% Accept 76.4% Employment (Fourth Quarter after Exit) 76.5% Accept 76.5% 77.0% Accept 77.0% Median Earnings $ 7,200.00 Accept $7,200.00 $ 7,278.00 Accept $ 7,278.00 Credential Attainment |
Rate 70.0% Accept 70.0% 70.5% Accept 70.5% Measurable Skill Gains Effectiveness in Serving Employers WIOA Youth Employment (Second Quarter after Exit) 76.5% Accept 76.5% 77.3% Accept 77.3% Employment (Fourth Quarter after Exit) 72.0% Accept 72.0% 72.5% Accept 72.5% Median Earnings Credential Attainment Rate 72.0% Accept 72.0% 73.0% Accept 73.0% Measurable Skill Gains Effectiveness in Serving Employers Labor Exchange (LEX)* Employment (Second Quarter after Exit) 56.0% Accept 56.0% 57.2% Accept 57.2% Employment (Fourth Quarter after Exit) 54.6% Accept 54.6% 55.3% Accept 55.3% Median Earnings $ 5,200.00 Accept $5,200.00 $ 5,250.00 Accept $5,250.00 Effectiveness in Serving Employers

4. ASSESSMENT

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

The Connecticut Department of Labor (CTDOL) Performance and Accountability Unit and WIOA Administration Unit, in collaboration with colleagues in comparable functions at DORS and CSDE, will develop and maintain a dashboard tool to capture and summarize selected data concerning program effectiveness and the aggregate impact of Connecticut’s workforce system in addressing the vision, goals, and principles described above.

The dashboard will be reviewed quarterly by the CETC committee responsible for performance evaluation. This committee will identify opportunities for improvement and convene system partners and stakeholders to share information and develop strategies to rectify identified challenges. Broad measures to be reviewed regularly will include: 1. Business engagement and delivering value to business/employer customers. 2. Measurable skills development in terms of educational attainment and workforce credentials that matter to Connecticut businesses. 3. Securing jobs in demand occupations showing promise for long-term growth in industry sectors valuable to Connecticut’s economic expansion. 4. Earned wages that help jobseekers and workers attain financial security and demonstrate career advancement. 5. Workforce system investments that generate a quality return.

The CETC in coordination with the State WIOA Administration will provide on-going evaluation of core programs through the evaluation of activities in order to promote continuous improvement in the following ways:

1. Establish a policy for continuous improvement of core programs which includes:
   a. Surveys
   b. CTHires integration
   c. Analytical and Statistical methods.
   d. Other methods as deemed appropriate

2. The mechanism for providing this review will be established and maintained by the CETC in conjunction with the state programs responsible for core programs and the local boards.
3. The tool selected to be used for evaluations will include customer feedback and outcome and process measures and employ rigorous analytical and statistical methods.

4. The state will prepare reports regarding the evaluations and make them available to core partners, boards and the public on a yearly basis.

Designated staff from units at CTDOL, DORS and CSDE responsible for the collection, review, analysis and reporting about WIOA-related program performance data – joined by designated staff from the CTDOL Office of Research – will form a System Assessment Work Group as a subcommittee of the CETC Planning and Performance Accountability Committee (PPAC). The Work Group will meet regularly to review required (mandatory) cross-program performance results data – and other relevant measures/information, as feasible, as determined by the PPAC – to extract and summarize key findings in a dashboard format for committee review and action. Relevant data on program activities will be obtained by the responsible lead State agency, respectively, and shared among agencies (need to describe how?) for purposes of developing the dashboard tool. The methodology ultimately will be worked out between the System Assessment Work Group and PPAC, once convened, operational and focused on its charge.
C. STATE STRATEGY

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


Economic development is most effective when approached with a clear vision, an eye for long–term stability and growth, and a strong plan of execution. While the state needs to continue to manage its finances responsibly and to streamline government, it must also make the required investments to move our economy forward and innovate in ways that will benefit all Connecticut residents.

The Connecticut Employment and Training Commission (CETC – the State Workforce Board), the State agencies responsible for administration of the core WIOA programs encompassed by this Unified State Plan (Connecticut Department of Labor (CTDOL), Connecticut State Department of Education (CSDE), and Department of Rehabilitation Services (DORS)), the Connecticut Department of Social Services (CTDSS) and the five Workforce Development Boards – propose and will support a set of broadly–conceived strategies intended to achieve the vision and goals outlined above. These strategies will serve as a framework for Connecticut’s implementation efforts, with corresponding detailed State and local implementing actions to be developed. (1) Describe the strategies the State will implement, including industry or sector partnerships related to in–demand industry sectors and occupations and career pathways, as required by WIOA section 101(d)(3)(B), (D). “Career pathway” is defined at WIOA section 3(7). “In– demand industry sector or occupation” is defined at WIOA section 3(23).

Support Business Growth: • Promote implementation of business/employer–led industry partnerships at both State and regional/local levels, focusing on targeted sectors. Consistent with principles and criteria developed by the WIOA Transition Business Engagement Work Group. Focus of these partnerships will be on high–priority, high–value, high–demand sectors and occupations.

• Promote effective implementation of regional/local sector–based initiatives in targeted sectors, consistent with principles and criteria developed by the WIOA Transition Business Engagement Work Group, intended to address employers’ priority needs, building on the achievements of existing successful regional sector initiatives. Strategically connect qualified jobseekers produced by the workforce system to job opportunities with businesses/employers benefitting from public investments, to strengthen the link between workforce development and economic development strategy.

• Implement a coordinated business/employer services model through the American Job Center One–Stop system, engaging coordinated participation by a broad array of partners and stakeholders, to address business/employer customers’ workforce needs, consistent with the “single
point of contact” model principles and criteria developed by the WIOA Transition Business Engagement Work Group.

• Promote implementation of a robust labor market information system to buttress effective workforce system planning at State and regional/local levels, engaging the analytic capabilities of workforce system partners, including insight and intelligence from businesses and employers, to promote data–informed and data–driven decisions about program strategy and related investments. Build on and maximize the capabilities of CTDOL’s Training and Education Planning System (TEPS) tool to improve capabilities to analyze labor demand and supply, to help focus workforce development strategy. Develop and utilize a dashboard tool to capture, distill and analyze data on critical indicators to inform workforce planning and strategy. Strengthen the capabilities of the P20–WIN longitudinal data system.

• Support local sector partnerships through ongoing funding, technical assistance, program initiatives, and the development of statewide policies related to sector partnerships. WIOA requires sector partnerships as a local workforce activity, and requires states to use of a portion of statewide discretionary funds to support local areas in the development, convening, and implementation of industry/sector partnerships.

• Provide high–quality labor market information and planning tools through the CTDOL Office of Research. The WDBs will continue to rely on the CTDOL Office of Research to provide updated data (e.g., occupational projections) to help inform demand–driven workforce development activities that train people for jobs that exist (as opposed to the old “train and pray” approach). The Office of Research should build upon its annual “Information for Workforce Investment Planning” document for each workforce development region, which proves invaluable to WDB planning and fund development efforts. The Office of Research should expand this document to reflect a more regional approach, particularly with respect to sectors. CTDOL should also explore the possibility of collaborating with DECD to utilize DECD supplementary demand data to enable the document to better inform demand–driven workforce development approaches.

• Share promising practices across regions to promote the replication of effective employer engagement strategies statewide. While the CWDC provides a mechanism for cross–regional information sharing among the WDBs, CTDOL and the CETC represent platforms for the development of statewide workforce development policies and practices.

• Support Workforce Development Board efforts as incubators of innovative, effective sector partnerships. For example:

• Capital Workforce Partners (CWP), together with Connecticut Women’s Education and Legal Fund (CWEALF), convenes the Metro Hartford Alliance for Careers in Healthcare (MACH), an employer–led network whose purpose is to identify and respond to workforce development and policy issues for entry–level and middle–skill positions in the healthcare industry. MACH convenes working committees to address issues such as identifying the needs for entry–level and middle–skilled workers in various segments of the healthcare industry. Working committees are chaired by an employer partner, and staffed by CWP and CWEALF. MACH hosts workforce events such as an informational career fair, a job fair, and a symposium where workforce development issues affecting the industry are explored, and employers and employees who participate in and advance workplace learning are recognized in an awards ceremony. • The Eastern Connecticut Workforce Investment Board (EWIB) convenes the Eastern Connecticut Manufacturing Pipeline Initiative, a sector partnership lauded by U.S. Labor Secretary Thomas Perez as a national model for industry–driven
partnerships among employers, education/training, and workforce development partners. This partnership has developed over seven years to ensure that education and training activities respond to the needs of manufacturers and other employers dependent on workers with STEM competencies. In response to a projected spike in employer hiring and a gap in the regional training infrastructure, EWIB formally re-convened the partnership in January 2015. This planning effort involving employers, community colleges, technical high schools, and other workforce development stakeholders resulted in a $6 million USDOL Workforce Innovation Fund award to implement and bring to scale a demand-driven, customized training program. • Over the past five years, the WorkPlace, Inc. has utilized HHS and USDOL funding to implement the Southwestern Connecticut Health CareeRx Academy, a regional partnership of hospitals, colleges, businesses, business groups, labor and CBO’s. The Academy addresses two major needs of the region: providing low-income populations with core skills and supports to obtain employment, and helping ameliorate healthcare industry workforce shortages. The Academy provides no-cost training and support to help participants get a career in the growing healthcare field. Strengthen Current Workforce: • Promote expanded implementation of effective incumbent worker training programs and services, focusing on targeted industry sectors, maximizing opportunities for business/employer participation, consistent with administrative criteria and principles established by the Connecticut Department of Labor (CTDOL).

• Promote expanded implementation of effective integrated employment and training/contextualized learning strategies to improve skills acquisition and employment outcomes for targeted low-skill jobseekers, including adult education students and participants in time-limited public assistance. Expand proven best practices as feasible to include additional prospective participants, working closely with businesses/employers in key sectors seeking qualified skilled workers. Maintain fidelity to rigorous program standards. Use the recommendations of CETC’s 2015 State Plan Addressing Contextualized Learning, Early College and Career Certificate Programs as a framework.

• Promote development and implementation of aligned career pathways strategies as an integral feature of industry partnerships and sector-based initiatives, with multiple on-off ramps for participants of varying skills and abilities, leading to employer-valued/validated credentials and certifications, consistent with principles and criteria developed by the WIOA Transition Business Engagement Work Group. Career pathways are equally valuable for adult jobseekers and young people, including students and out-of-school youth.

• Maximize opportunities for success for all individual jobseekers and workers in Connecticut’s talent pool, promoting innovation, effective coordination, resource alignment and integrated service delivery to advance the employability and career prospects for the broadest possible range of customers, including (but not limited to) veterans, the long-term unemployed, public assistance participants, individuals with disabilities, ex-offenders, homeless individuals, out-of-school youth, low-skilled adults, limited English proficient, etc.

• Promote and maximize opportunities to fulfill WIOA statutory language that adults receiving public assistance benefits receive priority access to services.

Develop Future Talent: • Build Connecticut’s K–16 talent pipeline, engaging a broad spectrum of education, higher education, workforce system and business partners and stakeholders, to prepare Connecticut youth with work and career readiness skills. Focus on regional/local sector-based initiatives, emphasizing career pathways approaches. Integrate a strengthened and expanded Summer Youth Employment Program into a comprehensive youth career pathways strategy. Expand

• Promote implementation of effective developmental/transitional instruction and learning strategies to ensure that recent Connecticut high school graduates are qualified for credit–bearing courses level upon college matriculation, or can quickly get up to speed.

• Develop pathways for academically low–performing at–risk students and out–of–school youth leading to certifications and credentials that enhance their viability in the job market. Build on and expand the Jobs for America’s Graduates (JAG) program model to prepare academically at–risk high school students for college success. Build on and expand the opportunity youth coordinated career pathways model to help targeted out–of–school youth acquire valuable post–secondary credentials and get a job.

• Promote the strengthening of articulation agreements between vocational technical high schools and community college credit and non–credit certificate programs, especially in expanding employment sectors.

Transform System Capacity: • Re–imagine delivery of customer services to individual jobseekers and workers in the American Job Center One–Stop system. Develop and implement streamlined service flow with efficiently aligned and integrated processes implemented by coordinated service teams representing the full range of contributions from system partners and stakeholders, consistent with principles and criteria developed by the WIOA Transition Service Design and Delivery Work Group. Build on lessons learned from implementation of the Disability Employment Initiative (DEI) and Secure Jobs pilots as models for innovative and effective multi–partner service coordination.

• Develop and implement strong, effective cross–entity/cross–program functional partnerships to enhance efficient delivery of effective customer services. Develop shared governance structure with clear policies and procedures. Develop consensus on unified consistent messaging and communications to key audiences/market segments. Pursue critical resources collaboratively. Braid and leverage available resources strategically. Implement consistent cross–agency/cross–program staff training on shared/common functions and responsibilities.

• Strengthen regional collaboration between WDBs and Community Colleges to focus strategy and align program design responsive to business/employer demand to develop students/customers qualified for good jobs in the local labor market.

• Implement a transparent performance system for all WIOA core programs, expandable as feasible over time to include informative performance–related data from relevant programs not specifically included in this Unified State Plan. This strategy will build on the successful foundation of the CETC Legislative Report Card produced annually by the CTDOL Office of Research, to review labor market data and outcomes for recent graduates of the public higher education system and participants in key job training programs and services. Utilize and analyze cross–program performance measures. Use the performance accountability process to regularly review, monitor, assess and report on the impact of workforce system programs and related investments. Align technology systems and data platforms across agencies and programs as feasible to maximize efficiency and cost–effectiveness. • Conduct ongoing research and analysis to identify opportunities for system continuous improvement and maximize system capacity, making strategic use of data to focus training efforts and align resources. Develop, maintain, analyze and report on an updated statewide inventory of workforce–related programs, to inform strategy and as a source of information to help the American Job Center
One-Stop system apprise customers of opportunities. Focus training investments and advocacy on clearly identified best practices for each targeted sector and each customer segment.

- Invest in state-of-the-art technology to improve cost-effective service delivery, including technology-based instruction and e-learning, efficient access to employment opportunities, integrated across agencies to enhance general accessibility to programs and services for all customers irrespective of barriers and/or disabilities, etc.

- Strengthen regional collaboration among the employment and training system planning and operational entities and the social/health service systems in order to insure public assistance recipients receive priority access to WIOA resources/services.

Vocational Rehabilitation Services at the Department of Rehabilitation Services (DORS) In addition to the broad system-wide goals discussed above, DORS has adopted a complementary set of strategies reflecting a commitment to increase employment opportunities for individuals with disabilities through the provision of vocational rehabilitation and supported employment services. Adopted strategies focus on: methods to expand and improve services; how a broad range of assistive technology services and devices will be provided at each stage of the rehabilitation process; outreach procedures to identify and serve Individuals with Disabilities from un-served and underserved populations; methods to improve and expand vocational rehabilitation services for students with disabilities; strategies to improve performance accountability measures; strategies to assist other components of the statewide workforce development system; and how these strategies will be used to achieve goals and priorities consistent with the comprehensive needs assessment and support innovation and expansion activity. Details are available in the distinct plans for each of the Department’s Vocational Rehabilitation and Supported Employment programs included in this Unified State Plan.

The Malloy administration has targeted a core group of industry sectors expected to drive economic growth in Connecticut over the next decade: aerospace and advanced manufacturing; bio-science/life-sciences; insurance/financial services; and several emerging industries, including biomedical research, digital media and entertainment, green/sustainable technology, medical device production and high-tech manufacturing. These sectors typically include high value-added businesses that require ready access to a deep and continuous pool of highly-skilled, well-educated, extremely productive talent as their lifeblood of success. It is anticipated that the State will support workforce strategies intended to promote the growth of these sectors as a strategic economic development/workforce development priority.

In addition, Connecticut’s local Workforce Development Boards have identified industry sectors of strategic importance at the regional level, varying by region, where industry partnerships and sector-focused initiatives have been developed to focus on critical workforce supply/demand priorities. These have involved advanced manufacturing, Healthcare, Construction/Energy/Green Technology, Information Technology, Engineering/STEM, Financial Services, Transportation/Distribution/Logistics, and Service/Retail/Hospitality.

Various innovative industry partnerships are underway across Connecticut in these key sectors, where employers are actively collaborating with workforce system stakeholders to develop career pathways opportunities to prepare skilled workers for critical, in-demand occupations. WI-OA emphasizes employer-led industry partnerships/sector strategies, featuring career pathways leading to industry-validated credentials. Workplace-based learning strategies – including apprenticeships, on-the-job training, and customized incumbent worker training – are encouraged. CETC will
encourage and support existing employer-led industry partnerships and promote new opportunities for the workforce system to partner with employers in key sectors to develop pathways leading to credential attainment and productive career opportunities.

The newly created CETC Business Engagement Committee (BEC) will play a key role in providing direction, guidance and oversight to Connecticut’s multiple industry-led sector workforce partnerships. Comprising CETC members representing business, invited employers representing key industry sectors, and selected workforce system stakeholders, BEC will pick up on the work conducted in 2015 by the WIOA Transition Business Engagement Work Group.

BEC’s work will focus on: developing strategies to promote effective business-led industry partnerships; sector strategies focusing on key in-demand and emerging sectors driving economic growth in Connecticut; career pathways initiatives reflecting best practices; and, other partnership opportunities to enhance the responsiveness of Connecticut’s workforce system to meet the talent and skills needs of Connecticut employers. It will serve as an umbrella for regional sector-specific work groups, addressing the workforce priorities of designated priority industry sectors. BEC will work with existing industry-led sector partnerships – at the State and local levels – as an overarching vehicle to promote and support their efforts, sharing information on a regular basis about priorities, challenges, opportunities, proposed strategies, relevant initiatives, etc. It will reach out through CETC business membership to identify/solicit input from prominent industry sector work groups.

State strategy concerning sector partnerships envisions BEC playing a convening role to promote the efforts and support the success of regional, employer-led sector workforce partnerships that have developed organically, at the local/regional level, involving engaged employers and workforce stakeholders who have come together to collaborate on their own terms, to address workforce-related challenges that they have defined, opportunities to collaborate and partnership strategies that they themselves have developed at the local/regional level, without the need for State direction. It is envisioned that in its convening role (described in response to item III.a.1, below) BEPC will invite participation by representatives from a number of existing (and new ones, as they are developed) employer-led sector partnerships, to take practical steps to provide support and promote expansion and success.

At the outset of its work it is anticipated that BEC will pursue direct engagement with a number of ongoing sector initiatives, including (but not limited to): Connecticut Manufacturing Innovation Fund/Investing in Manufacturing Communities Partnership; Connecticut Energy Workforce Development Consortium; Eastern Connecticut Manufacturing Pipeline Initiative; Metro Hartford Alliance for Careers in Healthcare; Southwestern Connecticut Health CareRx Academy; North Central Connecticut Jobs Funnel; and, Transportation, Distribution and Distribution (TDL) Partnership (Metro Hartford). Other sector partnership initiatives will be engaged as BPEC’s work gets underway.
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).

Representatives of State agencies responsible for administering core WIOA programs (CTDOL, DORS and CSDE) and CTDSS joined by representatives of other critical workforce system collaborators and stakeholders, will participate in ongoing integrated State and local-level monitoring and oversight to identify gaps to be addressed and opportunities for effective program and resource alignment.

Lead responsibility to review and assure alignment of programs and resources falls to the CETC Executive Committee, which includes senior representatives of the core WIOA agencies and leaders of CETC committees and work groups. Regular input from the committee overseeing performance will inform the Executive Committee’s focus on program alignment. This Committee will be supported by the CTDOL Performance and Accountability Unit and Office of Research and will be charged to: review system performance to ensure value and productivity of investments; analyze labor market information to identify gaps, needs and opportunities for innovation and improvement; and provide insight and guidance to the Executive Committee and CETC on appropriate actions.

Lead responsibility for providing oversight and guidance to efforts to map out the specifics of state strategy to ensure operational alignment of core programs will be assigned to the newly created CETC Service Design and Delivery Committee (SDDC).

The statewide network of American Job Centers (AJC) is where the practical partnering efforts will occur among key partnering organizations, including CTDOL, the workforce development boards and their various contractual AJC operators, DORS and CSDE.

Designated senior representatives of those partner entities will be convened as an ad hoc, time-limited working group under the aegis of SDDC, charged to map out the practical operational details of cross-program partnering, service integration, coordination of referrals, etc.

Achieving consensus on effective strategies to improve alignment of core programs and strengthen workforce development activities is at the core of the work SDDC (and its working groups/subcommittees) will perform in the months ahead as WIOA implementation proceeds. This cooperative effort is in its early stages, very much a work in progress.

The CETC (with OWC support) will provide oversight to these efforts going forward to ensure that alignment occurs in an effective manner.
III. OPERATIONAL PLANNING ELEMENTS

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

The Unified or Combined State Plan must include—

1. STATE BOARD FUNCTIONS

Describe how the State board will implement its functions under section 101(d) of WIOA (i.e. provide a description of Board operational structures and decision making processes to ensure such functions are carried out).

The Connecticut Employment and Training Commission (CETC) serves as Connecticut’s State Workforce Development Board. Originally established under the former Job Training Partnership Act (JTPA), CETC was authorized in 1998 as the State Board under the Workforce Investment Act (WIA), and in July 2015 Governor Malloy designated CETC to serve as the State Workforce Development Board consistent with “alternative entity” provisions of the Workforce Innovation and Opportunity Act (WIOA). The United States Department of Labor (USDOL) subsequently approved that designation. Governor Malloy designated the Connecticut Department of Labor Office of Workforce Competitiveness to coordinate WIOA implementation efforts in Connecticut in its capacity as a workforce development policy advisor to the Governor and staff to CETC. With CETC’s endorsement, OWC established four Work Groups in spring 2015 to prepare for the implementation of WIOA: • Service Design and Delivery Work Group – Focusing on the effective and efficient operations of Connecticut’s American Jobs Centers One–Stop career system. • Technology, Data, Outcomes Work Group – Addressing the collection and reporting of data across core WIOA programs to support transparent performance accountability. • Business Engagement Work Group – Proposing actions to promote strong employer–led industry partnerships, sector strategies and career pathways initiatives. • Administration/Governance Work Group – Responsible for ensuring that requisite administrative policies, agreements, procedures and structures are in place to support and sustain an aligned and integrated statewide workforce system.

Moving forward into 2016, it is anticipated that CETC will revise its organizational structure to be able to address the priorities identified in this Unified State Plan and to satisfy its functional responsibilities as the State Board under WIOA. That organizational structure will be consistent with WIOA requirements while also reflecting CETC’s unique history and experience.

As CETC’s revised organizational structure evolves, it is likely that the Service Design, Business Engagement and Outcomes Work Groups described above – or similar in form and function – will remain in existence at least through calendar year 2016, to provide operational guidance and direction to Connecticut’s WIOA implementation efforts.

CETC members, WDBs, and partner agencies will be invited and encouraged to participate on these groups. During this ongoing transition period, the committee structure of the CETC will be formed that will focus on the following:

- Business Partnership and Engagement
- Service Coordination amongst State agency partners and the WDBs
- Workforce Education and Young Adults
- Performance Accountability and Continuous Improvement

There will be opportunities for partners, WDBs and all workforce development stakeholders to participate in the new committee structure once formalized.
The CETC and/or its Executive Committee will carry out the State Board functions under Section 101(d) of the WIOA for the present time.

Within available resources, CTDOL’s Office of Workforce Competitiveness will coordinate professional staff support and technical assistance for CETC’s efforts to meet its obligations as the State Workforce Development Board.

Three new CETC standing committees have been created to ensure that CETC fulfills its State Board obligations consistent with WIOA Section 101(d). These are the CETC Services Design and Delivery Committee (SDDC), Planning and Performance Accountability Committee (PPAC), and Business Engagement Committee (BEC).

Key assigned responsibilities for each committee, consistent with their respective draft proposed charges, are as follows:

Service Design and Delivery Committee (SDDC):

• Advise on development/oversee implementation of an integrated, customer-centric (jobseekers and employers) One-Stop service delivery system.

• Integrated State-level and local-level oversight and monitoring of One-Stop system to identify/address gaps and opportunities for effective program and resource alignment.

• Review/oversee statewide policies and practices to align workforce development programs.

• Advise on policies/practices to ensure effective system alignment.

• Advise on development/oversee implementation of Connecticut’s One-Stop career services delivery system, covering full range of relevant services and (WIOA) program requirements, with clear roles and responsibilities for all One-Stop core partners and other stakeholders: key elements of effective One-Stop delivery system; structuring One-Stops to best serve jobseeker and employer customers; effective service coordination among State, core partners and WDBs; Business Services delivery to employer customers, etc.

• Advise on development/oversee implementation of full range of employment-related products and services available to jobseeker and employer customers, and how they will be accessed/provided.

• Advise on development/oversee implementation of common intake/enrollment procedures.

• Advise on development/oversee implementation of uniform/consistent assessment tools and referral/follow-up process to ensure that customers (including persons with disabilities) are referred efficiently to appropriate services.

• Advise on development/oversee implementation of best work-based training practices, including apprenticeship, internship, work experience, on-the-job training, incumbent worker training, etc.

• Propose statewide policies to continuously improve One-Stop system services, including criteria and procedures to assess One-Stop effectiveness, guidance on allocation of One-Stop infrastructure funds, roles and contributions of One-Stop partners, etc.
• Advise on development/oversee implementation of procedures to ensure that relevant performance measures are used to inform service delivery practice.

• Develop strategies for One-Stop system technological improvements to enhance customers’ digital literacy skills accelerate acquisition of skills and credentials, strengthen staff professional development, and ensure technology accessibility.

• Propose development of staff training across partner entities.

• Identify/promote dissemination of best practices information on effective One-Stop centers, training programs responsive to real-time labor market analysis, and effective local work-force boards.

Planning and Performance Accountability Committee (PPAC):

• Advise on/oversee performance of One-Stop system delivering an array of workforce-related services across multiple partner and stakeholders entities.

• Develop/update/propose workforce system objectives and performance metrics (for ongoing review) to support effective system performance and continuous improvement. Collaborate with CTDOL Performance and Accountability Unit and other State agency partners and stakeholders to develop and update comprehensive State workforce system performance accountability measures.

• Prepare/review/endorse annual performance reports. Collaborate with CTDOL Performance and Accountability Unit and State agency partners and stakeholders to help prepare, review and endorse annual performance reports.

• Monitor/report (to CETC) on status of services/resources coordination and alignment across Connecticut’s workforce system to support effective implementation.

• Receive/review regular performance status reports (including quarterly dashboard) and pro-pose actions to address identified improvement opportunities.

• Collaborate with CTDOL Performance and Accountability Unit and other State agency partners and stakeholders to develop and monitor implementation of strategies to align technology and data systems across One-Stop partner programs.

• Collaborate with CTDOL Office of Research and other State agency partners and stakeholders to help develop and monitor a statewide workforce and labor market information system.

Business Engagement Committee (BEC):

• Collaborate with employers to promote strong employer-led industry partnerships, sector strategies and career pathways initiatives in targeted industry sectors.

• Develop effective strategies to reach out to, engage with and meet the needs of Connecticut businesses and employers as valued customers of the state’s workforce system.
• Serve as an umbrella/framework for sector-specific partnerships and work groups, addressing workforce priorities of designated high-priority industry sectors, at both State- and regional/local-levels.

• Support effective career pathways initiatives closely linked to sector strategies.

• Propose strategies to increase value, access to and acquisition of industry-validated, portable, stackable workforce skills related credentials.

• Identify existing industry partnerships/sector strategies career pathways initiatives in Connecticut.

• Identify best/promising practices (in Connecticut and elsewhere) to support effective industry partnership/sector strategies and career pathways initiatives.

• Develop/proposal common definitions for high quality industry partnerships, sector strategies and career pathways that align with WIOA definitions.

• Identify/propose relevant industry-recognized credentials, for targeted occupations in key sectors, and propose strategies to: increase number of individuals with industry-valued credentials; increase value of credentials to employers; integrate apprenticeships into workforce services valued by employers; clarify appropriate role of adult education in helping to obtain industry-valued credentials.

• Propose actions to support effective industry partnerships/sector strategies/career pathways efforts: strengthening current industry partnerships/sector strategies/career pathways efforts; helping Connecticut industry partnerships/sector strategies/career pathway initiatives learn from each other; addressing practical actions workforce system partners can take (i.e., resources, technical assistance, etc.) to support these initiatives; administrative/legislative policies to be changed/created; policies, procedures, investments needed to support development of career pathways efforts, etc.

• Develop proposals addressing how workforce system partners can coordinate efforts to deliver effective services efficiently to employer customers.

Lead responsibility for each of the specific State Board functions under WIOA Section 101(d) is specifically assigned to one of the three committees – with oversight provided by CETC and technical assistance/guidance from OWC – as follows:

1. Develop, implement and modify State Plan – PPAC

2. Review statewide policies, programs, and recommended actions to support comprehensive streamlined workforce system – SDDC

3. Develop and continuously improve workforce system:

   A. Identify barriers to coordination and alignment (avoid duplication) – SDDC

   B. Develop career pathways strategies – BEC

   C. Develop outreach and access strategies for individuals and employers – SDDC
D. Develop and expand industry/sector partnership strategies – BEC

E. Identify regions and designate local areas – PPAC

F. Develop continuous improvement strategy for One-Stop system – SDDC

G. Develop staff training strategies – SDDC

4. Develop and update comprehensive State performance accountability measures – PPAC

5. Identify and disseminate information on best practices for:

A. Effective operation of One-Stop centers – SDDC

B. Development of effective local boards – SDDC

C. Effective training programs responsive to real-time labor market analysis – BEC

6. Develop and review statewide policies to coordinate services through One-Stop system:

A. Criteria/procedures for WDBs to assess effectiveness/continuous improvement – PPAC

B. Guidance to allocate One-Stop center infrastructure funds – SDDC

C. Policies on roles and contributions of One-Stop partners – SDDC

7. Develop strategies for technological improvements to One-Stop system to:

A. Enhance digital literacy skills – SDDC

B. Accelerate acquisition of skills and credentials – SDDC

C. Strengthen staff professional development – SDDC

D. Ensure accessibility of technology – SDDC

8. Develop strategies to align technology and data systems across One-Stop partner programs – SDDC

9. Develop location formulas to distribute funds to local areas for adult and youth programs – PPAC

10. Prepare annual performance reports – PPAC

11. Develop statewide workforce and labor market information system – PPAC

12. Develop other policies to promote statewide objectives and enhance system performance. – CETC as a body
Each CETC committee will be provided with requisite technical assistance and staff support to ensure that it is capable of fulfilling its functional obligations, coordinated by the Office of Workforce Competitiveness, within available resources, including engagement by expert staff from each of the core program partner agencies, within available resources.

2. IMPLEMENTATION OF STATE STRATEGY

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

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

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

Core WIOA program activities in Connecticut will be aligned as partners build upon existing inter-agency relationships and program collaborations.

American Job Centers (AJC) Customer Flow: • Walk-in customers at comprehensive American Job Centers (with exception of Hamden/New Haven) will be greeted at main reception desk by a team of CTDOL and WIB partner staff, as front desk coverage will be a shared responsibility between the two partners. • CTDOL will provide a full time Unemployment Insurance staff expert at the front desk of the Hartford, Bridgeport, New London, Waterbury and Hamden offices to answer any Unemployment Insurance-related inquiries from customers. • The Career Centers in each comprehensive American Job Center will be staffed jointly by CTDOL and WIB staff (With the exception of New Haven), with each partner committed to assigning a minimum of one staff member on a full time basis. • When a job seeker enters an American Job center seeking services, the American Job center staff will first determine whether or not the customer is registered in to the new CTHires system used to track the services provided to each job seeker. If the customer is not registered, they will be guided to a computer and asked to complete the CTHires customer registration. If the customer needs assistance in completing the registration process, staff assistance will be provided to them. • All American Job Center customers will be provided with some form of orientation to the employment services that are available to them through all of the various partners. Job Center staff will discuss the customer’s job search plans to steer her/him in the right direction. Customers will get the opportunity to sign up for a number of free employment readiness workshops, such as Job Search Strategies, Job Interviewing Techniques, Resume Preparation and many others. If the customer needs one-on-one job search assistance, career counseling, or a resume critique, every effort will be made to provide that service. If the customer is interested in self-service activities, s/he can utilize the Career Center computers, fax machines, copiers, resume paper, free postage for applications and resumes, etc. Customers will also be informed about the various services available under WIOA. • Customers who self-identify as Veterans will complete a Veterans Triage form to determine if they have a significant barrier to employment and qualify for one-on-one job search assistance from a CTDOL Veterans Representative. Jobseekers with a self-disclosed disability may be referred to either a Disability Program Navigator or Disability Employment Initiative representative (depending on region). Jobseekers with disabilities may also be referred to DORS for service. All customers have the option of accessing the universal services available to everyone in the center. • Two full-time staff will be assigned to each of the career centers in the comprehensive
American Job Centers to support and assist jobseekers in whatever way needed. Jobseekers needing to improve computer skills will be referred to a computer skills workshop or drop-in computer skills classroom to work on developing or enhancing their computer skills. • Customers interested in WIOA services will be connected to the appropriate WIOA representative or WIOA information session. • All American Job Center (AJC) customers will be asked if they are receiving public assistance benefits (i.e. TANF, SNAP, HUSKY, Care 4 Kids) and referred to the appropriate WIOA service entity to assist with any special needs beyond those offered by the AJC. Such referrals will be documented and outcomes noted. Connecticut Department of Labor (CTDOL) services and WDB Title I services will be co-located wherever/whenever possible with Title II/Adult Education and Title IV/Vocational Rehabilitation Services. It is understood that space availability and cost may be barriers to achieving the objective of co-location with Adult Education and DORS, but that remains the objective. If/where co-location is not feasible, all staff in each of the comprehensive American Job Centers will be trained to become familiar with services provided by Adult Education and DORS and be able to make an intelligent, informed decision about when to refer a customer to one of these agencies. In turn, all staff at Adult Education and DORS will be trained to become familiar with the services available at the American Job Centers across Connecticut, capable of making referrals to those Job Centers for any customer.

The American Job Centers will be hubs from which jobseekers can be referred to sector-focused programs in targeted sectors such as Manufacturing, Health Care or Construction. Job Developers from organizations like DORS may choose to join the Regional Business Service teams in each region. American Job Center staff will be familiar with these targeted sector grants and programs in each region and capable of making informed referrals to them. In some situations, targeted sector programs may be co-located at an American Job Center. Accessible printed information will be available to jobseekers concerning these programs.

The regional WDBs deliver Adult and Dislocated Worker program activities through the American Job Center system via comprehensive and affiliate centers. Career services are provided to a wide range of jobseekers, with specialty programs directed to returning veterans and individuals with disabilities. Services include career coaching, guidance on job search techniques, skill and interest assessments, advice and support through peer groups, individual employment planning, and job development and placement. Occupational training is provided through access to Individual Training Accounts (ITAs). Business Services Teams engage employers and provide recruitment and hiring assistance, as well as access to an array of training resources for incumbent workers and new hires.

Priority of Service Section 134(c)(3)(E) of WIOA establishes a priority requirement with respect to funds allocated to a local area for adult employment and training activities. Under this section, one-stop center staff responsible for these funds must give priority to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient in the provision of individualized career services and training services. Under WIA, priority was required to be given to public assistance recipients and low-income individuals when States and local areas determined that allocated funds were limited. Under WIOA, priority must be provided regardless of the level of funds. WIOA also expanded the priority to include individuals who are basic skills deficient as defined in WIOA section 3(5).

Veterans and eligible spouses continue to receive priority of service for all DOL-funded training programs, which include WIOA programs. However, when programs are statutorily required to provide priority for a particular group of individuals, such as the WIOA priority described above, priority must be provided in the following order:
• First, to veterans and eligible spouses who are also included in the groups given statutory priority for WIOA adult formula funds. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority for services provided with WIOA adult formula funds. • Second, to non-covered persons (that is, individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds. • Third, to veterans and eligible spouses who are not included in WIOA’s priority groups. • Last, to non-covered persons outside the groups given priority under WIOA.

Local areas will establish written policies and procedures to ensure priority for the populations described above for participants served in the WIOA Adult program.

CTDOL–Administered Services WIOA Title 1 and Wagner–Peyser services will be available through four of Connecticut’s comprehensive American Job Centers. The one exception is the south central local workforce area where CTDOL devotes considerable Wagner–Peyser resources to support an office in Hamden and the WDB, Workforce Alliance, devotes considerable resources to support an office in New Haven. Ultimately these offices will merge into a single, affordable, comprehensive center, preferably in New Haven, in a site that meets customers’ needs of our customers, is on a public bus line, has adequate parking, and is ADA compliant. In four of Connecticut’s five comprehensive AJC s – Hartford, Waterbury, New London, Bridgeport – and also in Hamden, CTDOL will provide the following services:

Wagner–Peyser Labor Exchange: Under the Wagner–Peyser Act, CTDOL Employment Services (ES) receives federal funding to provide universal access to an integrated array of employment-related labor exchange services, including job search assistance, job referral, and placement assistance for jobseekers, reemployment services to unemployment insurance claimants, and recruitment services to businesses with posted job openings. During the last full program year a total of 28,668 Wagner–Peyser customers benefitted from employment services, including: assistance with career choices and job searches; job search resources (i.e., fax machines and computers with Internet connection); workshops on résumé writing, interviewing, and career exploration; information about specific companies and labor market trends; and, one-on-one career counseling. An additional 9,042 individuals received résumé services at CTDOL–sponsored events and in the AJC centers. Staff with board-certified credentials from the Professional Association of Résumé Writers provided resume preparation services.

Reemployment and Eligibility Assessment (REA): The Unemployment Insurance (UI) program delivers a key service in the integrated workforce system by providing temporary financial assistance to eligible workers during periods of unemployment. The reemployment needs of UI claimants and the prevention and detection of UI improper payments are addressed through the UI Reemployment and Eligibility Assessment program (REA), providing claimants an entry point to a full array of services available at the American Job Centers, ensuring that claimants comply with all UI eligibility requirements. Recent studies have concluded that REA has helped other states accelerate the time it takes the unemployed to return to the workforce.

Connecticut’s UI REA program will be implemented statewide in five American Job Centers and will target claimants with higher weekly benefit rates who are least likely to exhaust their unemployment benefits and thus, return to work quicker. CTDOL will conduct one UI REA per selected claimant for a total of 7,500 UI REAs in the program’s first year (2016). UI REA appointments will be conducted in the Bridgeport, Hartford, Hamden, New London, and Waterbury offices. All claimants selected to participate will be required to report in-person to receive the mandated services listed below. Each
claimant will be referred to appropriate service(s) and/or training consistent with a reemployment plan.

Required REA Services • UI eligibility assessment and referral to adjudication, as appropriate, if a potential issue is identified • Provision of labor market and career information that is specific to the claimant’s needs. • Registration with the state’s job bank. • Orientation to AJC services. • Development and review of an individualized reemployment plan that includes work search activities, accessing services provided through an AJC or using self-service tools, and/or approved training. • Referral to at least one reemployment service and/or training based on an assessment of the claimant’s most critical need identified in the individualized reemployment plan. The Unemployment Insurance Reemployment Services and Eligibility Assessment (RESEA) program will replace UI Reemployment and Eligibility Assessment (REA) program. Once CTDOL transitions to the RESEA program the target population served will be UCX claimants and those claimants most likely to exhaust their UI benefits. Under WIOA, the UI program is a vital workforce system service and mandatory One–Stop partner in the American Job Centers. UI claimants continue to be priority customers. Both reemployment programs require the leveraging of partner programs to meet the needs of UI claimants in order to expedite their return to work.

Trade Adjustment Assistance (TAA): Trade Adjustment Assistance helps individuals belonging to worker groups certified by the United States Department of Labor (USDOL) whose jobs have been affected by increased imports or production shift to a foreign country. To assist eligible workers return to suitable employment as quickly as possible, benefits include training; job search, relocation and readjustment allowances; health coverage tax credit; and wage subsidies for individuals 50 and older who return to lower–paying work. TAA activity during the 2014–15 program year included: • Worker group certifications: Petitions filed on behalf of workers from 11 companies were approved this past program year, with the workers determined by USDOL to be adversely affected by foreign trade and certified as eligible to apply for TAA; petitions filed on behalf of workers from five companies were denied. • Individual applications: 432 individuals were identified by USDOL as potentially eligible to apply for TAA benefits and 286 eligibility determinations were issued in response to submitted applications. • Training: 252 individuals entered TAA–approved training programs and 548 individuals were active in training. Training payments totaled $2,649,822. • Trade Readjustment Allowances (TRA): A total of $5,418,267 was paid for 11,124 weekly TRA claims, representing 3,581 weeks of basic TRA, 6,980 weeks of additional TRA, 246 weeks of remedial TRA and 317 weeks of completion TRA. Individuals who satisfy applicable program requirements may receive one or more types of TRA income support: up to 26 weeks of basic TRA; up to 52, 65, or 78 weeks of additional TRA, depending on the Trade Act petition number; and up to 26 weeks of remedial/completion TRA. • Reemployment/Alternative Trade Adjustment Assistance (R/ATAA): A total of $294,860 in payments was issued to eligible workers. • Health Coverage Tax Credit (HCTC): HCTC tax credit covered 72.5% of qualified health insurance premiums for eligible individuals and their families. This IRS program expired January 1, 2014, and the credit was not available during this program year. Customer Co–Enrollment into TAA and WIOA: In June 2015, CTDOL implemented a policy in coordination with the five WDBs to ensure that all TAA–eligible customers are referred to the WIOA provider in each region for co–enrollment into WIOA, thereby enabling TAA participants to take maximum advantage of benefits available through both programs.

Enhanced Reemployment Services (ERS): CTDOL staff will continue to prioritize Unemployment Insurance (UI) claimants served by the Enhanced Reemployment Services (ERS) program. ERS identifies UI claimants likely to exhaust their benefits, unlikely to return to their previous occupation, and in need of job search assistance services to make a successful transition to a new job. In the 2014–15 program year, orientation sessions were conducted for 7,434 ERS participants. Sessions
included provision of labor market information, career guidance, information about CT jobs, overview of American Job Center services, and details on UI benefit rights and responsibilities. Many ERS participants also benefited from direct, individual employment services and training to facilitate their return to work, resulting in 20,803 additional reemployment services provided to facilitate their return to work.

Veterans Services: Connecticut’s 300,000 veterans represent 9% of the state’s population. The CTDOL Office for Veterans Workforce Development advocates for and assists Connecticut veterans and Covered Persons with their employment and training needs through job service assistance, referral to supportive services, intensive career services (case management), State and federal program information/referral, insuring priority of services for veterans and encouraging the use of all American Job Center resources. One-on-one job search assistance will be available to veterans in all of the six American Job Centers in Connecticut either on a walk in basis or by appointment. Veterans qualifying for one-on-one services include: Military members who have separated within the past 36 months; Service connected disabled veterans; Campaign badge veterans; Veterans with non-service disabilities; Veterans with 180 consecutive days active duty, not serving in support of any conflict; National Guard/Reserves members (Title 10); Homeless veterans; and other Covered Persons. Several outstations also provide veterans services including: U.S. Department of Veterans Affairs-Vocational Rehabilitation and Employment Office; Connecticut State Colleges and Universities; VA Medical Centers; US Veterans Affairs Veterans Centers; and local homeless shelters. During the last full program year, a total of 5,660 Veterans were served by all staff in the American Job Centers. A total of 1,985 Veterans were served by CTDOL Veterans Workforce Development staff.

TANF/JFES: Connecticut’s Temporary Assistance for Needy Families (TANF)/Jobs First Employment Services (JFES) program is co-administered by the CTDSS and CTDOL. TANF/JFES provides assistance to needy families and pregnant women meeting eligibility criteria in all political subdivisions of the state. Assistance for basic needs is provided to needy families through the Temporary Family Assistance (TFA) component administered by CTDSS and the Jobs First Employment Services (JFES) program is administered by CTDOL in partnership with the Workforce Development Boards (WDBs). The ultimate goal of Connecticut’s TANF/JFES program is to provide assistance to needy families to enable them to move out of poverty and into self-sufficiency. The TANF/JFES program is a time limited assistance program based on the assumption that welfare should be a temporary program of assistance and it is better to work than to be on welfare. Recipients are encouraged to assume personal responsibility for their economic self-sufficiency. Unless they meet exemption criteria, adults are required to seek and retain employment if it is available. Recipients unable to secure employment without intervention from the state will receive services, including education and training that will assist them in becoming employed. Applicants must attend the initial employment services assessment intake session for further employment assessment/plan development before TFA benefits are granted. The TFA program attempts to direct participants to employment sufficient to move them off assistance within twenty-one months. The program contains many features that support this objective. The asset limit is $3,000 so families may set aside money for emergencies. Families are allowed to own a reliable car to seek employment, to travel to and from work, or to transport a handicapped family member. To be excluded, the family’s equity in the vehicle must not exceed $9,500 or the vehicle must be used to transport a handicapped family member. Earned income of recipients is totally excluded up to the Federal Poverty Level (FPL). Once earnings reach the FPL, the family becomes ineligible for assistance. Up to $50 per month of current child support is passed through to the family each month and excluded as income. Childcare and transportation benefits are provided in order to enable individuals to prepare for, obtain and retain employment. If a family member refuses to participate in Employment Services
activities, the family is penalized through grant reduction. If the family has made a good faith effort to comply with the employment activities but still has income below the payment standard at the end of twenty-one months of assistance, a six-month extension of benefits may be given. Extensions may also be given to families who have encountered circumstances beyond their control such as domestic violence. To qualify for an extension the family’s income cannot exceed the payment standard corresponding to the size of the family. Following are the array of available Work Related Activities for TANF recipients: 1. Unsubsidized Employment 2. Subsidized Private Sector Employment 3. Subsidized Public Sector Employment 4. On-the-Job Training 5. Job Search and Job Readiness Assistance 6. Work Experience 7. Community Service Programs 8. Vocational Educational Training Not to Exceed 12 Months 9. Child Care for an Individual Participating in a Community Service Program 10. Job Skills Training Directly Related to Employment 11. Education Directly Related to Employment 12. Satisfactory Attendance at Secondary School or in a GED program

Connecticut State Department of Education (CSDE) The Connecticut State Department of Education (CSDE) administers core programs and services listed in the Adult Education and Family Literacy Act (WIOA Title II). Each local and regional board of education must establish and maintain a program of adult classes or provide for the participation in a program of adult classes for its adult residents (Connecticut General Statutes Section 10–69). CSDE–Administered Activities • To support shared governance structure, CSDE will participate in shared governance with regard to WIOA Unified Plan programs through the Connecticut Employment and Training Commission (CETC), the State Workforce Investment Board. • To strengthen interagency partnerships, CSDE will: ? Share system infrastructure costs. ? Provide services through the One–Stop system. ? Make funding available to each of Connecticut’s five designated local workforce areas. ? Review and evaluate proposals with a team including representatives of the WDBs and One–Stop system partners. ? Assess local workforce areas’ needs and WDBs’ goals in conjunction with each WDB. ? Refer students to One–Stop Centers, monitor, act on referrals from One–Stop Centers. ? Provide appropriate training for One–Stop partners. • To strengthen coordination and collaboration with key educational sectors and employers, CSDE will: ? Align Integrated Basic Education and Training (I–BEST) training curriculum with employer/labor market needs. (I–BEST is Connecticut’s contextualized integrated education and training program strategy.) ? Partner with community colleges to assist adults’ transition to postsecondary education and training. ? Work with the One–Stop system to address the needs of local customers and employers and link adult education strategically to other employment and training services.

• Work with the State’s longitudinal data system and use a common intake form to provide consistently defined and applied data from adult education programs. • To continue to invest in integrated technology to meet the unified technology requirements of WIOA and other Federal initiatives, CSDE will work to interface the Connecticut Adult Reporting System (CARS) with the State’s common intake and reporting system. • To support engagement in continuous research and analysis to realize the potential of state’s workforce programs and delivery systems, CSDE will continue to offer the I–BEST program and ensure that it is aligned with labor market needs. • To assist the entire WIOA partnership deliver a unified message, CSDE will participate in coordinated system–wide efforts to increase awareness of the Connecticut workforce system.

DORS Administered Activities The department’s Vocational Rehabilitation (VR) and Supported Employment (SE) programs will assist individuals with disabilities to prepare for, secure, retain, advance in or regain employment.
Connecticut Department of Social Services Administered Activities SNAP E&T: SNAP Employment and Training is administered by the CT Department of Social Services (CTDSS). The primary goal is to assist SNAP E&T participants with work–related activities that will lead to paid employment. Short–term vocational programs are job focused and employer driven. The SNAP E&T Program is currently in transition. As a way to better serve low–income SNAP recipients, all future partnerships will operate under a 50% reimbursement model. This allows CTDSS to use federal funds to leverage nonfederal funds already being invested in employment activities.

The components of Connecticut’s SNAP E&T program are currently delivered through six nonprofit organizations, four community colleges, and one private college. Expansion efforts are underway. FNS approval will be sought before the department adds additional SNAP E&T 50% reimbursement partners. Our current 50% partners are Capital Community College (CCC) located in Hartford, Gateway Community College (GCC) located in New Haven, Asnuntuck Community College (ACC) located in Enfield, Goodwin College located in East Hartford, Opportunities Industrialization Center (OIC) located in New London, and Northwestern Connecticut Community College (NCCC) in Winsted. Our 100% contractors are Community Renewal Team (CRT) located in Hartford, The Kennedy Center located in Waterbury, Eastern Connecticut Workforce Investment Board in Franklin, Career Resources in Bridgeport, and Workforce Alliance in New Haven.

Case management activities include conducting assessments; developing employment plans; making referrals as appropriate to education, vocational training and community service; conducting or making referrals to structured job search training; and career placement. Case management services can also include referrals for support services such as child care, transportation and other services required to enable the participant to remain engaged in his or her activity. Our current contractors provide case management services that are unique to their SNAP participants and above and beyond what they provide to their other non–SNAP clients. A key piece of their case management is ensuring that the SNAP recipients comply with all SNAP requirements, such as completing the recertification process by reminding them that they will not be eligible to participate in SNAP E&T if they fail to meet all of the SNAP requirements. For participants who already have skills that are marketable in the current economy, the first component will be structured job search training. For participants without marketable skills, the first component will be vocational/occupational skills training, educational programs, or self–initiated workfare.

Community Services Block Grant (CSBG): CTDSS administers the CSBG federal block grant (approx. $8M annually) with assistance from the CT community action agency network. The purpose of CSBG is the reduction of poverty, revitalization of low–income communities, and empowerment of low–income families and individuals to become fully self–sufficient.

CSBG can provide an array of services – employment work supports, child and family development, community empowerment, independent living. CSBG has identified the following national performance indicators for states to follow: persons employed; maintain job for at least 90 days; achieve a “living” wage; receive employment supports such as skills/competencies; and completion of ABE/GED.

Child Support CTDSS administers the statewide child support program. The goals of the child support programs are to assist families in reaching independence through increased financial and medical support, establish paternity for children born out of wedlock, and connect non–custodial parents with the Fatherhood Initiative.
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.

Activities conducted for and services provided to jobseekers, workers and employers through the core WIOA programs covered by this Unified State Plan represent a significant portion of Connecticut’s larger informal workforce development system. Other vital entities and stakeholders in the broadly conceived workforce system include the Connecticut Department of Social Services (DSS), Department of Economic and Community Development (DECD), Board of Regents for Higher Education/ Connecticut State Colleges and Universities (BoR/CSCU); Connecticut State Department of Education (CSDE) K–12 comprehensive schools system, Connecticut Technical High School System (CTHSS), Office of Early Childhood (OEC), an extensive network of private colleges and universities represented by the Connecticut Conference of Independent Colleges (CCIC), proprietary schools, regional/local Chambers of Commerce, sector–focused business associations, organized labor, community–based organizations (CBOs) and non–profit service providers.

Collectively this spectrum of stakeholders represents more workforce development–related resources and programs, serving more participants, than do the core WIOA programs covered by this Unified State Plan. The stakeholders in Connecticut’s broad and informal workforce system identified above have an impressive history and track record of collaboration in developing effective strategies and minimizing duplication. The broad objective of the WIOA Transition Work Groups is to share and review timely information about relevant programs and services offered among all pertinent workforce stakeholders, to identify opportunities for alignment and coordination, and to minimize unintended duplication of effort. Similar regional partner transition teams may be established by each regional WDB to develop and share comparable information among workforce stakeholders at the local/regional level.

OWC will update CT’s inventory of workforce development programs and services, built on the information generated by these teams, to help target opportunities for coordination and to minimize the likelihood of duplication. The inventory will be a valuable resource for the CETC and the workforce system.

CSDE: Alignment with Activities Outside of the Plan CSDE will work in conjunction with Unified State Plan partners through ongoing participation in the efforts of CETC (the State Workforce Investment Board) to align activities with other agencies that operate outside scope of this Unified State Plan.

DORS: Alignment with Activities Outside of the Plan The Department of Rehabilitation (DORS) will collaborate and cooperate in a coordinated manner through a set of specific agreements with a wide array of organizations, entities and programs among workforce–related partners and stakeholders not specifically covered by this Unified State Plan, to pursue and achieve their respective objectives. Details are available in the state plan for vocational rehabilitation and supported employment services incorporated in this Unified State Plan.

OEC: Alignment with Activities Outside of the Plan The OEC will be an engaged partner with respective entities that prepare and provide training for individuals seeking and currently working with young children in families across any setting. The OEC will partner with workforce entities to
ensure individuals entering and re–entering the workforce have access to high–quality and stable child care through our School Readiness program, Child Day Care Centers, Smart Start, Preschool Development Grant program, and Care4Kids child care subsidy program.

The child care subsidy program is an integral partner within Connecticut’s workforce system. Funded by the federal Child Care Development Block Grant Act, Care4Kids provide a child care subsidy to parents who are either enrolled in TFA, enrolled in an approved education and training program, or who are employed. The childcare subsidy is intended to make child care more affordable, therefore, allowing parents to enter the workforce and stay employed. The child care subsidy can be used for all types of early childhood settings, including licensed centers and family child care homes, and unlicensed family, friend and neighbor. The CCDBG reauthorization of 2014 is requiring states to implement significant policy shifts that address continuity of care and quality of care for the child. The focus on continuity provides more child care stability for working parents.

The OEC will be available to provide information to the Workforce Investment Boards and other workforce partners about the importance of high–quality childcare and early childhood resources. Specifically, the OEC can provide information and training on our Child Care Resource and Referral service and Child Care 211 Infoline. The OEC can also make OEC and 211 Child Care materials available at WIB offices.

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

Describe how the entities carrying out the respective core programs, Combined State Plan partner programs included in this plan, and required and optional one-stop partner programs will coordinate activities and resources to provide comprehensive, high-quality, customer-centered services, including supportive services to individuals including those populations identified in section II(a)(1)(B). The activities described shall conform to the statutory requirements of each program.

Key State agency and local WDB partners have all been directly engaged in the statewide process of planning for WIOA implementation at State and local levels, emphasizing coordination of services and resources to provide high quality customer services and requisite support services. The Commissioners of CTDOL, DORS, CSDE, and CTDSS serve as members of the CETC, the entity responsible for review, endorsement and modification of the Unified State Plan to ensure coordination objectives are met. Senior staff members from each agency are active participants in the WIOA Transition Work Groups established to develop cross–program/cross–agency strategies to coordinate service delivery efficiently for individual workforce system customers and jobseekers.

Staff from these agencies played major roles in developing proposals reached by these Work Groups (addressing: data collection and reporting for performance accountability, effective engagement with businesses partners, and service design and delivery through the One–Stop system) that form the core of this Unified State Plan, much of which describes the commitment to planned coordination.

Commitments to service and resource coordination among these State agencies are captured in a Memorandum of Understanding (MOU) executed by the respective State agency Commissioners.

Similarly, at the regional/local level, representatives of these State agencies participated in the planning efforts of each of Connecticut’s five WDBs to develop local WIOA plans, emphasizing cross–agency/cross–program coordination consistent with provisions described in the endorsed Unified State Plan.
Connecticut will establish a coordinated State/local process that enables the key State agencies responsible for core and required WIOA programs – Connecticut Department of Labor (CTDOL), Department of Rehabilitation Services (DORS), Connecticut State Department of Education (CSDE), Bureau of Health/Nutrition, Family Services and Adult Education, and Connecticut Department of Social Services – and other relevant and appropriate partners and stakeholders to make informed, collaborative decisions concerning how the workforce system responds to the needs of the jobseekers and employers.

At the State–level, it is anticipated that the WIOA Transition Work Groups (which will include CETC members) will be operational through 2016. Their term beyond 2016 will be determined based on need. The Office of Workforce Competitiveness will provide support and technical assistance.

At the local level, Regional Partner Transition Teams will be convened and organized as necessary in each of Connecticut’s five local workforce areas by the local WDBs. The WDBs and regional CTDOL staff will collaborate to ensure that each team receives requisite support – convening and facilitating meetings communicating among participants, etc., necessary to function effectively. Each Regional Partner Transition Team will consist of well–informed and empowered regional representatives of the core WIOA State agencies (as feasible) and selected regional partners and stakeholders, including representatives from private philanthropy and older workers. The WDBs and CTDOL will identify and reach out to prospective participating entities, which will select their own representatives to participate. The objective is to be inclusive while maintaining a group of manageable size.

Regional Partner Transition Teams will meet on a bi–monthly basis to review and discuss the status of service delivery efforts for individuals and jobseekers served by the integrated regional workforce system, identify service delivery gaps, and consider improvement opportunities for coordinated service delivery. Each team will serve as a forum where regional partners can raise concerns to the attention of the others, clarify the resources at their disposal to help address shared challenges, strategize as a team and problem–solve collectively. This approach is similar to the Consortium model currently operating in the North Central local workforce area, where partner organizations meet on a regular basis to provide oversight and guidance to the regional One–Stop system. Regional Partner Transition Teams will include stakeholders from organizations representing individuals with disabilities, ex–offenders, homeless people, low–literate individuals, older individuals, TANF participants, etc., to ensure that needs are met.

The Administration WIOA Transition Work–Group staffed by OWC, will receive regular updates and information from the Regional Partner Transition Teams on how WIOA implementation efforts are progressing within each of Connecticut’s five workforce areas, and will be responsible for providing guidance and direction to the five Regional Partner Transition Teams. The work group will be both receiver and disseminator of information to ensure that there is a consistent approach and realistic transition strategy throughout Connecticut that all key partners understand and support. It is anticipated that CETC will develop and embrace performance benchmarks focusing on effective cross–agency/cross–program partnership and coordination in delivering effective services that achieve results for individuals and jobseeker customers of the workforce system.

CETC will adopt One–Stop certification criteria emphasizing resource and service coordination. CETC will adopt benchmarks that measure the effectiveness of service and resource coordination. The CETC committee overseeing performance will monitor and report regularly on the status of this priority objective.
Connecticut’s American Job Center (AJC) One–Stop system is the vehicle through which service delivery and targeting, leveraging and braiding of available resources is coordinated. Connecticut has a history and tradition of innovative collaboration among multiple partners and stakeholders to coordinate services and resources at the local level through its One–Stop system. To establish an overarching framework for consistent service and resource coordination going forward, CETC adopted a vision and guiding principles for Connecticut’s AJC One–Stop system, based on proposals developed by the Service Design and Delivery Work Group, comprising experienced staff from key workforce system partners.

Vision: Comprehensive American Job Centers in Connecticut will provide excellent customer service to jobseekers, workers and businesses, in Centers that reflect innovative and effective service design, operated with integrated management systems and high–quality staffing, to achieve desired outcomes.

Guiding Principles: Connecticut's AJC One–Stop system will operate in a manner consistent with the following guiding principles.

Customer Service: • Comprehensive Centers provide a welcoming environment to all customer groups served, by courteous, polite, responsive and helpful staff. • The One–Stop system strives to improve the skills of jobseekers and worker customers, using labor market information to focus training efforts on genuine career opportunities, offering access to training that develops skills leading to industry–validated credentials, and placing customers into productive employment. • The One–Stop system pursues opportunities for individual jobseekers and workers at all levels of experience. • One–Stop system offers career services that motivate, support and empower customers. • The One–Stop system emphasizes the importance of demonstrable skill development, through effective assessment and training services. • Comprehensive Centers develop, offer and deliver quality services to business customers. Business Services staff members understand their customers' needs and priorities, identify and develop effective strategies, and align available services among partners.

Service Design: • Comprehensive Centers utilize an integrated intake process, coordinated by effective, expert front line staff for all customers. • The One–Stop system connects business customers to practices and strategies that actively engage industry partnerships, making effective use of timely economic and labor market information, linked to sector strategies and career pathways efforts. • The One–Stop system strikes a balance between its traditional labor exchange role and the need for strategic talent development targeting employers' priorities, emphasizing the importance of regional approaches. • One–Stop system facilities, programs and services are physically and programmatically accessible to all customers. • The One–Stop system includes both Center–based service delivery and through virtual alternative sites, including public libraries, community–based organizations, etc.) • The One–Stop system incorporates and values innovative evidence–based service and effective delivery strategies.

Management and Staffing: • Regular operations of comprehensive Centers reflect robust partnerships, with integrated staff offering seamless services. • One–Stop system staff are all properly trained and equipped to do their job. Staff members are also cross–trained by function. • One–Stop system services are organized and integrated by function, rather than by program, relying on effective, cross–agency/cross–program functional teams. • The One–Stop system employs an efficient, integrated case management strategy. • Comprehensive Centers are staffed with experienced, effective, trained career counselors. • One–Stop system activities are guided by explicit
set of operational policies/procedures. • The One–Stop system uses common performance measures.

Services for Jobseekers: One–Stop system services generally available to jobseekers (including military veterans, individuals with disabilities, mature/older workers, etc.) in comprehensive AJC Centers include: common intake (CTHires); access to labor market information; skills assessments; Dislocated Worker certification; Workshops; resume development/interviewing assistance (group/individual); access to support services (e.g., transportation assistance, child care, etc.); job postings; access to copier/fax/phones; computer access; job search assistance; access to Trade Adjustment Act services; career counseling; job placement services; Unemployment Insurance access assistance; case management; referrals to occupational skills training; access to adult education services (ABE/GED); linkage to SNAP E&T; Jobs First Employment Services (JFES); and benefits counseling; linkage to CTDSS regional offices to insure public assistance is confirmed for mutual applicants; linkages to TANF/ JFES case management entities; linkages to SNAP E&T programs; linkages to judicial system to support needs of non–custodial parents.

CSDE: Coordination, Alignment and Provision of Services to Individuals Through a Request for Proposals (RFP) process, CSDE will solicit eligible agencies to provide services to eligible individuals who are 17 years old or older, are not enrolled or required to be enrolled in secondary school under Connecticut law, are basic skills deficient, do not have a secondary school diploma or its recognized equivalent, or are English language learners. Adult education programs will serve as the major Unified Plan Partner entry point for individuals who lack basic skills. Once a participant has enrolled, adult education provider staff will refer participants to a One–Stop Center or Youth Provider to conduct a workforce assessment and develop an educational/career plan. Once participants meet adult education exit criteria, they will be sent back to a One–Stop Center for re–evaluation. A unified referral management system will help local programs track participants as they move from agency–to–agency. This system will allow programs to give timely assistance to participants if they get stuck or seem to be dropping out. Information will be shared with adult education partners about adult education eligibility requirements, as well as dates, times, and locations of sites where adult education is offered.

DORS: Coordination, Alignment and Provision of Services to Individuals The Department of Rehabilitation Services (DORS) Vocational Rehabilitation (VR) programs offer a wide range of services to eligible individuals, including guidance and counseling, mobility training, rehabilitation technology, adaptive equipment, rehabilitation teaching, job coaching, on–the–job training, low vision services, as well as a variety of skills assessments, are among the services provided.

DORS/BRS provides services in 16 offices across Connecticut where consumers may apply for assistance. In three of these locations, BRS is co–located with at least one core partner program. In several other locations, offices are in close physical proximity to partners. As long–term lease obligations and other logistical issues prevent movement toward increasing the number of co–locations, it is believed that formalizing referral processes and creating a service delivery structure that encourages partner collaborations will lead to improved coordination in services. BRS intends to assign staff specifically to each American Job Center (AJC) to act as a dedicated liaison. In addition, he/she will be expected to serve on all relevant committees and work groups at the AJC. This will allow partner agencies to easily direct AJC customers who have disabilities to BRS, and BRS staff to connect consumers to appropriate AJC partners directly. BRS will continue these relationships in the places where they exist and create them in all other AJCs.

DORS/BESB provides services on a statewide itinerant basis through its office location in Windsor.
The 2016-2020 draft State Workforce Plan for the Senior Community Service Employment Program (SCSEP) addresses the need to further coordinate SCSEP with other labor market and job training initiatives through the following strategies:

Strategy: SCSEP will develop and implement marketing strategies aimed at increasing awareness of SCSEP services within labor market and job training initiatives.

During the last SCSEP Workplan, strides were taken to improve the partnership between SCSEP and the one-stop system. The CT State Department on Aging (SDA) met with one-stop administrators to provide information about older workers and about SCSEP. Each of the state’s SCSEP offices has a working relationship with the local one-stop. In some areas that relationship is very strong as sub-grantee staff is co-located in the office.

Staff provides information about SCSEP to potential enrollees. In other regions where co-location is not available, SCSEP continues to refer participants for workshops and job development services.

The one-stops continue to be valuable resources for SCSEP participants across the state and the state will endeavor to continue cultivating these partnerships.

Strategy: SCSEP grantees will endeavor to revitalize the partnerships with each one-stop in their service area by providing information about SCSEP and seeking out ways to help support their efforts.

Strategy: SDA will develop a comprehensive webpage listing job skills training and job development services available to older workers throughout the state.

MOU Status: The majority of WDB/partner MOUs are executed. Each of the state’s five workforce boards has additional partner MOUs to be completed. Additionally, the CETC PPAC will draft a policy and guidance regarding infrastructure costs to assist with the alignment of workforce development programs and operations.

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

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

Connecticut’s One–Stop workforce system has a strong tradition of cooperation among partners and coordination of effort across agencies in providing services to business customers. Each comprehensive American Job Center features a distinct Business Services Team comprising designated professional staff from the CTDOL, the regional WDB in that local workforce area, and/or the entity contracting with the WDB to provide business services, and other stakeholders and partners, the mix varying by region and local circumstances. Going forward, central to the efforts to serve employer customers framed in this Unified State Plan, Connecticut has adopted a set of criteria to serve as a framework guiding the efforts of partners in providing comprehensive high–
quality services to address business’ workforce priorities. The Business Engagement Work Group
developed these criteria, comprising expert staff, experienced in and knowledgeable about working
directly with business customers, and reflect lessons learned from effective practice in Connecticut.

Each comprehensive American Job Center will organize Business Services functions to serve
business customers in a single, unified, coordinated team structure. Participants will include:
regional staff of CTDOL, the local WDB, contractual operators of the business services function in
the Center, representatives of the Department of Economic and Community Development (DECD);
Department of Rehabilitation Services (DORS) Vocational Rehabilitation programs, Connecticut
State Department of Education (CSDE) Bureau of Adult Education (and/or designated local adult
education providers), regional community colleges, representatives of the TANF/JFES case
management entities and CTDSS partner entities as appropriate and other stakeholders that may be
invited to participate, including representatives of the Technical High Schools, etc. The Business
Services Teams will be encouraged to reach out proactively to engage and communicate with
regional/local economic development officials to share intelligence, identify job–matching
opportunities, etc. As feasible, these economic development professionals will be encouraged to
participate on the regional teams.

Each regional Business Services Team will strive to operate as a "single point of contact" in dealing
with business customers to ensure efficiency in delivering effective services that meet their needs.
Each Business Services Team will attempt to manage and limit the number and frequency of
contacts with individual businesses, assuming responsibility to collaborate in coordinating services
from among a broad range of options available across programs and across agencies, to provide
each business customer a set of services options and strategies, and to communicate consistently
and easily. What happens among workforce system partners “behind the curtain” of the system is
and should be irrelevant to business customers and the quality of service they receive.

The guiding principles that frame this unified, coordinated Business Services Team structure are
adopted from standards developed and used successfully in the North Central workforce area: • It’s
not about us – It’s all about the Business! • We are committed to providing service to Business
customers that is seamless. • Business customers in the CTHires databank must post all job
openings for which recruitment support is provided. • All posted job openings will be
communicated/accessible to the full network of prospective jobseekers. • All job openings and
recruitment efforts will be communicated to all Business Services Team members within 24 hours of
becoming known.

Business Services Team participants will use one common information system – CTHires. The
Business Services Team will schedule regular working meetings among all participating partners to
share information and coordinate strategy. Participants on the regional Business Service Teams will
be cross–trained on an ongoing basis to ensure consistency of effective practice in serving employer
customers. Recruitment efforts with business customers will be scheduled collectively among
partners, to maximize impact. Businesses seeking services and support from the Business Services
Team will be vetted to ensure their eligibility and appropriateness. While it is understood that job
opportunities identified and developed by the publicly funded workforce system are accessible to all
prospective jobseekers, the Business Services Team will conduct a responsible level of pre–
screening of candidates to promote an opportunity for satisfactory job matches. It is anticipated that
efforts to match qualified jobseekers with vetted job openings will be a key feature of customized
regional sector strategy initiatives.
Information developed to describe the programs and services available to business customers will be consistent, addressing the full range of options available in the local area. Efforts to promote available business services will be marketed extensively, consistent with a focused customer outreach strategy in each region. Effective use of social media will be promoted as a priority tool to drive customer traffic and communicate about service options, including Facebook and Linked–In.

CSDE: Coordination, Alignment and Provision of Services to Employers CSDE promotes workforce preparation skills including literacy instruction, employability skills, career exploration and development, and links to employment, employment services and other options to respond to the evolving workforce needs of Connecticut’s business community and promote individual self–sufficiency. Providers develop partnerships with local businesses for on–site workforce education classes to assist employees perform specific job tasks and increase productivity.

DORS: Coordination, Alignment and Provision of Services to Employers A “Team CT” model of cross–agency collaboration in serving businesses/employers will be established, providing a full range of available services through coordinated points of contact. What happens among system partners should be seamless for business/employer customers. One “Team” in each region should include (at minimum) knowledgeable, empowered representatives of: CTDOL, WDBs, One–Stop operator/contractor, DORS, Adult Education (mix of CSDE staff and/or rotating local adult education entities), Community Colleges (rotating among regional colleges), local economic development officials…plus any other relevant entities, to be determined/customized to meet regional/local realities (e.g., DECD, Technical High School, independent colleges, etc.)

Business participants need some “training” from system reps about what system has to offer, to help business partners become more effective in that role.

Co–location of Business Team partner staff is an aspirational ideal. Space availability, staffing limitations, etc. may limit feasibility, but still to strive for if/as/when feasible.

From the perspective of the DORS VR programs, the primary goal of coordinated activities with employers is to establish long–term partnerships that foster a mutually beneficial relationship for both the employer and VR consumers. A key component of the Department’s strategy is working with employers to develop long–standing relationships built on genuine interest in the work of each employer, their needs and their priorities. This could mean that an actual job opening for a particular client may not come along for some time, but the Vocational Rehabilitation Counselor is nonetheless a resource employers can turn to for information, referrals to other service providers, and to learn about job site accommodations and provisions of the Americans with Disabilities Act (ADA).

With these relationships, even when employers may not be immediately hiring, they can offer other valuable services such as informational interviews, job shadowing opportunities and work assessment site hosting. Company tours can further be arranged for consumers to learn about a wide variety of careers, particularly important to transition–age youth clients who may otherwise have very limited exposure to actual job sites.

DORS is enthusiastic about participating actively in a strong and collaborative strategy with the other workforce partners who engage in employer outreach, with a focus on offering employers a seamless and coordinated team approach to job order placing and matching candidates from participating programs to the needs of the employers.
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).

Connecticut education leaders and their key staff participate in decision–making processes defining and driving workforce system policy and strategy at both State and local levels.

At the State level, Connecticut’s Commissioner of Education (executive leader of Connecticut’s K–12 public schools system), and the President of the Board of Regents for Higher Education/Connecticut State Colleges and Universities (executive leader of a system of public 4–year universities and 2–year community colleges) sit as voting members of the Connecticut Employment and Training Commission (CETC), the State Workforce Board, and are thereby directly engaged in all phases of workforce development planning, strategy design, oversight and coordination. In addition, the Director of the Connecticut Technical High School System (CTHSS) participates as an ex–officio CETC member, ensuring that the contributions of CTHSS are included, critical information is shared, and opportunities for coordination of programs and services are pursued, addressing the shared goal of ensuring that youths and adults (students) are ready for productive work in Connecticut’s key industry sectors.

Representatives of the Connecticut State Department (CSDE) Bureau of Adult Education are active participants in the Work Groups charged to develop Connecticut’s WIOA transition strategy, and will continue to participate on these partnership teams as the focus turns to the realities of coordinated implementation in the months ahead. It is also anticipated that key representatives of the K–12 system, CTHSS and the CSCU / community colleges will participate on relevant CETC committees and ad hoc work teams going forward with the WIOA implementation process in the weeks and months ahead.

As senior managers in the Executive Branch, the Commissioner of Education meets on a regular basis with the Commissioner of Labor, Commissioner of Economic and Community Development, and the Academic Dean of the University of Connecticut as an executive working group, reporting to Governor Malloy, to share information and coordinate strategy on integration of workforce development, educational strategy and economic development efforts to promote Connecticut’s broad talent development efforts.

At the local level, selected leaders and representatives of local school districts in the K–12 system, CTHSS and community colleges, respectively, have served – and will continue to engage – both as members of Connecticut’s five local WDBs and as active participants on the respective WDBs’ various standing committees and work groups, thereby assuring that educational leaders are directly connected to critical workforce development planning and strategy design with other key system representatives close to where most program–level decisions get made.

Connecticut’s Preschool through Twenty and Workforce Information Network – P20 WIN – is a groundbreaking approach to education and workforce training–related data sharing in Connecticut. P20 WIN provides a secure data vehicle producing critical information needed to understand patterns over time and inform policy and strategy decisions to improve education, training and employment outcomes for Connecticut students. This new system allows Connecticut to evaluate how well our public education and training programs prepare students for additional education and careers in Connecticut. Executive leadership and senior research staff from the Connecticut State
Department of Education (CSDE), Board of Regents for Higher Education (BOR), the University of Connecticut (UCONN), the Connecticut Conference of Independent Colleges (CCIC) and Connecticut Department of Labor (CTDOL) actively participate in P20 WIN. An inter–agency data governance structure and data–sharing agreements support collaborative decision–making. Going forward, P20 WIN provides a systematic, secure and repeatable process to gather and analyze critical data to understand the impact of investments in education and workforce training programs, supporting coordination, alignment and integration consistent with WIOA principles, leading to better outcomes. Connecticut’s P20 WIN longitudinal data analysis capability will allow for improved understanding of how Connecticut’s various education and training providers and programs – including K–12, CTHSS, Community colleges – perform in helping students complete programs of study and perform in the workforce.

CSDE: Partner Alignment with Educational Institutions CSDE will promote partnerships among local adult education providers and institutions of higher education, especially community colleges, to promote the successful transition of participants to postsecondary education and training. CSDE will rely on information from the workforce development system to track the progress of participants who have exited from their programs and have entered postsecondary education and training.

DORS: Partner Alignment with Educational Institutions Both Vocational Rehabilitation Programs at DORS are actively involved in a variety of transition school–to–work initiatives, with extensive collaboration and coordination at the administrative and service delivery levels of the organization. Through a cooperative agreement with the State Department of Education, the roles and responsibilities of the VR programs and the public educational system are clearly defined, including financial responsibilities and coordination of services and staff training. Representatives from both VR programs serve on an interagency transition task force and appointed representatives from the Connecticut State Department of Education serves on the State Rehabilitation Council to BESB and to BRS. VR program information is presented at in–service training programs for public school teachers and guidance counselors on issues affecting students who have disabilities.

Regarding higher education, the Council of Regents has a cooperative agreement addressing services available in the university setting for students with disabilities. This agreement is with both VR programs and describes responsibilities to ensure that students with disabilities achieve equal access to classroom instruction, internships, and school–sponsored activities.

VR Program staff members participate and present information at BESB–organized in–service training programs for public school teachers and guidance counselors on issues affecting students who are blind or visually impaired. BESB Children’s Services Program provides a comprehensive training series every year for school district staff about low vision aids and adaptive technology, braille instruction, expanded core curriculum activities and resources that are available to facilitate the education and transition of students served by BESB.
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.

Collectively, the twenty (20) strategies outlined above, addressing the Unified State Plan’s four (4) broad goals, are intended to build Connecticut’s statewide job–driven education and training system. It is essential that all effective Connecticut education and training providers, including entities on the State’s Eligible Training Providers List, have the opportunity to engage productively in supporting implementation of those strategies. The Connecticut Employment and Training Commission (CETC) and Office of Workforce Competitiveness (OWC) will systematically communicate with and reach out to key partners, stakeholders and education and training providers beyond the State agencies responsible for core WIOA programs and the Workforce Development Boards (WDBs) – including the Board of Regents for Higher Education, Departments of Social Services, Economic and Community Development, Corrections, etc., and to their respective networks of contractual program operators and service providers – to communicate about opportunities for participation in workforce development planning, strategy design and implementation, through participation on various CETC committees and work groups, and similar opportunities at the local level in comparable activities coordinated by the various Workforce Development Boards (WDBs). CETC and OWC will monitor, report on and – as necessary – encourage and adjust that participation activity. To the extent feasible CETC, OWC and the WDBs will encourage and promote opportunities for the broadest possible range of education and training providers to participate in the design and submission of relevant workforce development–related competitive grant proposals at both state- and local–levels.

DORS has liaison counselors who work closely with the American Job Centers, which enables staff to make referrals for services within each agency’s programs. When appropriate, DORS consumers may be eligible for training offered on DOL’s eligible training provider list. Consumers take an active role in the process of pursuing these trainings, and VR Counselors are available to provide assistance. If there is a barrier to the DORS consumer accessing the trainings as a similar benefit to what DORS offers, the DORS counselor can approve payment to fund the DOL training. When DORS consumers access these DOL services, their names are automatically entered into the CTHires database.

The CSDE will work with other core programs and One–Stop partners to ensure that adult education and literacy activities are in alignment and to develop career pathways which provide access to employment and training services for individuals in adult education and literacy activities. The CSDE will collaborate with the DOL to assist local providers in partnering with One–Stop Centers to develop career pathways and provide access to employment and training services. Professional development will be provided to local programs, including orientation to adult education programs and services for One–Stop partners and other agencies. Local adult education providers will refer adult learners to the Workforce Development Boards’ Eligible Training Providers Lists for information about training opportunities in their region.

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).
In 2013 the OWC produced a comprehensive inventory and analysis of funding and investments that support Connecticut’s workforce development system. This was one effort in OWC’s continued work to advance the workforce system, to ensure it is responsive to jobseekers and businesses, and positions the state for economic growth. The inventory identified resources, sources of funds, targeted populations and services reported through an online survey. In gathering data OWC confirmed the complexity of the programs, number of relevant State agencies, identified hundreds of agencies involved in providing relevant services. Data was derived from reports and information from State agencies receiving and/or providing workforce–related funding, including the Departments of Labor, Education, Economic and Community Development Social Services, Developmental Services, and Children and Families. An online survey of one hundred agencies and providers across Connecticut yielded a 73% response rate.

Information concerning relevant funding and resources was reviewed and updated during the process of developing Connecticut's Unified State Plan. It is anticipated that in 2016 OWC will refresh this information, again working directly with designated staff in key State agencies and from the local WDBs (and their regional networks of local stakeholders). The inventory will be updated regularly and shared with key partners and stakeholders to identify opportunities to leverage resources to achieve maximum impact. Information will be shared with and reviewed by CETC.

In recent months, key Connecticut workforce development stakeholders have been notably successful in winning grant awards. This provides opportunities for innovative leveraging of resources across institutions and programs to improve access to training and education opportunities to build the skills and capabilities needed for employment success. Recent examples include the Health Opportunity Grants awarded to Connecticut Workforce Development Boards; American Apprenticeship Grant awarded to CTDOL, CTDOL’s Second Chance grant, CTDOL’s 2 Generation grant, and CTDOL’s Manufacturing Innovation Fund Apprenticeship program.

CETC and OWC will work particularly closely with executive leadership of CTDOL, DECD, BOR/CSCU, CSDE, DORS, DSS, CWDC and Connecticut Council on Philanthropy to identify relevant investments, identify prospective grants/funding opportunities and grant awards, share that information among these parties and convene/facilitate discussions to explore and pursue leveraging opportunities with a shared/common goal of increasing opportunities to increase access to education and training programs and services for more individuals.

CSDE: Leveraging Resources to Increase Educational Access CSDE provides funding to local workforce areas for literacy programs, using a competitive RFP process to distribute funding provided by the United States Department of Education, Office of Career, Technical, and Adult Education. Grantees will be required to align with system–wide goals and the labor market needs of local workforce areas.

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.

Connecticut recognizes the value and importance of postsecondary credentials and certificates to workers and businesses, and that they vary significantly by industry sector and specific occupation. As described earlier in this Unified State Plan, Connecticut has identified six sectors that are likely to
be the focus of workforce development efforts at both State and local levels: Manufacturing, Healthcare, Construction/Energy/Green Technology, Insurance/Financial Services, Information Technology, and Tourism. A variety of sector-specific initiatives will be supported and implemented within each of Connecticut's five designated local workforce areas, most in conjunction with the appropriate local WDB.

It is anticipated that the CTDOL Office of Research will analyze labor market information to help identify relevant credentials and licenses that are legally required and/or desirable for key in-demand occupations by targeted sectors in each region. WDBs and their business partners (including business associations such as the New Haven Manufacturers Association, Eastern Advanced Manufacturing Association, Aerospace Components Manufacturers, Connecticut Tooling and Machining Association, Connecticut Construction Industries Association, Connecticut Hospital Association, Connecticut Insurance and Financial Services Cluster, and regional Chambers of Commerce, etc.) will reach out to employers through existing business-led sector initiatives to identify and verify the credentials employers value and that actually contribute to hiring, productivity and opportunity for career advancement.

The sector initiatives will identify programs where relevant credentials and certifications can be acquired and will develop specific strategies and pathways to improve access and acquisition, customized to the requirements of each target sector and occupations. To the extent feasible these efforts will build on and expand proven effective models, including the State’s Incumbent Worker Training program, STEP–UP, the community colleges’ Advanced Manufacturing Centers and new manufacturing programs, Integrated Basic Education Skills Training programs (I–BEST), Job Funnels, Connecticut Technical High Schools focused education and training, etc.

Efforts will be pursued to expand apprenticeship opportunities in key sectors. In July CTDOL’s Office of Apprenticeship Training was awarded $7.8 million state funds from the DECD’s Manufacturing Innovation Fund to significantly expand the number of registered apprentices pursuing careers in Connecticut’s advanced manufacturing sector. In addition, CTDOL and the Office of Apprenticeship Training received a highly competitive American Apprenticeship Grant of $5 million from USDOL to fund the Connecticut American Apprenticeship Initiative (CT–AAI). A key component of this five-year initiative is the introduction of Competency and Competency/Time–Based Hybrid apprenticeship models. CT–AAI will enroll and serve 1,000 registered apprentices and 500 pre-apprentices statewide in high-demand Advanced Manufacturing, Healthcare and Business Services occupations. Employers ranging from small machine shops to General Dynamics Electric Boat, the various regional WDBs, and the Board of Regents for Higher Education provided significant commitments for apprenticeship placement.

CSDE: Improving Access to Postsecondary Credentials CSDE offers the three programs leading to a high school equivalency diploma: Adult High School Credit Diploma (AHSCD), General Educational Development (GED), and the National External Diploma Program (NEDP). Local adult education programs also provide basic skills and workforce education through its highly successful contextualized integrated education and training program, I–BEST. All participants in adult education, including those in Adult Basic Education and English as a Second Language, will learn about career pathways and will be taught the skills needed to succeed in postsecondary education and training. Participants who earn the high school equivalency diploma will be referred to community colleges and other institutions of higher education to transition to postsecondary education and training. Prior Learning Assessments One of the key strategies of the CT Health and Life Sciences Career Initiative (HL–SCI) centers on increasing awareness of prior learning and developing standardized tools for use in assessing such learning to accelerate, wherever possible, a
student’s path to completion. Toward that end, Charter Oak State College developed a number of tools for use by colleges in advising students to explore all possible avenues of prior learning. A reference guide and questionnaire are among those tools. Charter Oak also produced a series of short informational videos on the various types of prior learning that can lead to credit (those videos can be accessed at www.charteroak.edu). As administrator of the Connecticut Credit Assessment Program (CCAP), Charter Oak has also reviewed fifty–seven (57) non–credit courses at community colleges and work place training programs. That review has resulted in seven hundred nineteen (719) credits recognized. These credits can be accessed by students who completed the program up to five (5) years prior to the review and five (5) years from the date of the review. Not only do these credits assist students in completing their programs more rapidly, but they serve as an incentive for students who take non–credit programs at community colleges to apply those credits to further education in a for–credit program.

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.

Connecticut recognizes the critical value and importance of coordinating workforce development and economic development strategy, investments, programs and services at the State and local levels. The Commissioner of the Connecticut Department of Economic and Community Development (DECD) is a voting member of the CETC. In that role she participates in the review and oversight of Connecticut’s integrated workforce development system, helping to identify and promote integration and alignment of workforce development and economic development efforts statewide. The need for skilled talent in critical occupations in key industry sectors has been identified as a critical strategic priority by DECD, providing an incentive for continuing close cooperation and coordination of workforce development and economic development efforts going forward. Key elements of DECD’s Economic Development Plan concerning the needs and priorities of Connecticut’s in–demand and emerging industries and businesses have been integrated into strategies described in this Unified State Plan.

As senior managers in the Executive Branch, the Commissioners of Economic and Community Development, Labor, and Education, respectively meet on a regular basis, along with the Academic Dean of the University of Connecticut as an executive working group, reporting to Governor Malloy, to share information and coordinate integration of workforce development, economic development and educational strategy and promote Connecticut’s broad talent development efforts. These Commissioners will continue to have input and participation in the review of Connecticut’s Unified State Plan to ensure that opportunities for coordination are identified and developed.

In addition, leaders of the state’s largest business membership organization – the Connecticut Business and Industry Association – and several prominent regional/local Chambers of Commerce – Middlesex County Chamber of Commerce, Business Council of Fairfield County, Bridgeport Regional Growth Council, Northwest Connecticut Chamber of Commerce – serve as active members of CETC, collectively representing the interests of thousands of Connecticut businesses, large and small, providing insight and guidance on industry’s views on the convergence of economic development and workforce development policy and strategy.

Designated DECD staff participate on the WIOA Transition Business Engagement Work Group, providing intelligence and insight to inform strategies – concerning business–led industry partnerships, sector strategies, and career pathways initiatives – included in this Unified State Plan.
DECD representatives will continue to play a valuable role at the State level as participants in the CETC committees and work groups that will promote coordination of workforce and economic development efforts statewide going forward. It is anticipated that State and local economic development experts will play a key role in the efforts of the CETC committee overseeing business partnerships and engagement.

At the local level, representatives of DECD, regional/municipal economic development agencies, regional/local Chambers of Commerce and various business associations serve as members of Connecticut’s WDBs and participate on key local WDB committees and work groups to ensure workforce development and economic development strategic coordination customized to local conditions, priorities and opportunities. These strong existing working relationships will be fostered as WIOA implementation proceeds.

The Office of Workforce Competitiveness (OWC) Executive Director and staff will continue to work closely with designated senior staff colleagues from DECD to develop future opportunities for collaboration and coordination. Recent examples of OWC/CTDOL/DECD coordination include: Manufacturing Innovation Fund (MIF) Registered Apprenticeship Program and MIF Incumbent Worker Training Program, Investing in Manufacturing Communities Partnership (IMCP) Designation, etc.

Connecticut’s recently earned designation as a Manufacturing Community under the federal Investing in Manufacturing Communities Partnership (IMCP) program provides an opportunity and a vehicle to increase the level of coordination between workforce development and economic development activities. Connecticut’s IMCP plan, led by DECD, supports Connecticut’s manufacturing sector, with a strong focus on shipbuilding and aerospace. Connecticut has cultivated all the components of a strong manufacturing ecosystem. IMCP efforts will connect disparate components to create a cohesive and powerful tool to promote economic growth and synergies. Connecticut’s workforce development, education, and training systems work together to respond to employers’ education and training needs related to new technologies, materials and processes such as Pratt and Whitney’s development of the F–135 aircraft engine and Electric Boat’s Virginia Class submarine program. Connecticut’s IMCP workforce strategies build on a regional track record of successful cross–systems collaboration to accelerate the development of the human capital needed to support integrated industry clusters in aerospace and shipbuilding. The ongoing development of a regional workforce that meets industry demands will support the continued growth of these and other large companies, contributing to the attraction and expansion of small– and medium–sized enterprises and increasing Connecticut’s economic vitality and stability. Connecticut has a built a robust platform on which to continue the development of its skilled labor pool, and has developed aggressive plans to stimulate growth in the region. The IMCP effort will help Connecticut’s workforce match industry demand, leading to economic power, stability and quality of life. These efforts exemplify the kinds of workforce development/economic development collaboration that will be pursued as Connecticut transitions to active implementation of WIOA.

CSDE: Coordinating with Economic Development Strategies CSDE will participate in and support efforts of the Connecticut Employment and Training Commission (CETC – State Workforce Board) to assist Connecticut business employers by continuing to develop and implement contextualized integrated education and training I–BEST programs that address the workforce needs of those businesses.
B. STATE OPERATING SYSTEMS AND POLICIES

The Unified or Combined State Plan must include a description of the State operating systems and policies that will support the implementation of the State strategy described in Section II Strategic Elements. This includes—

1. THE STATE OPERATING SYSTEMS THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES. THIS MUST INCLUDE A DESCRIPTION OF—

A. STATE OPERATING SYSTEMS THAT SUPPORT COORDINATED IMPLEMENTATION OF STATE STRATEGIES (E.G., LABOR MARKET INFORMATION SYSTEMS, DATA SYSTEMS, COMMUNICATION SYSTEMS, CASE-MANAGEMENT SYSTEMS, JOB BANKS, ETC.).

While long term system-wide multi-partner agency integration remains a future goal, the state is working towards providing a single point of service across all core programs for participants. The newly installed CTHires system replaces CTWBS as a Virtual Once Stop service which allows customers and staffs a single point internet access for client services for all Title I & Title III programs. Phase 2 of the implementation will further enhance this by adding TANF, WOTC, REA online forms, and Alien Labor Certification to the system. The system is the official documenting source for all local One Stops and their providers. Geographic Solutions is in the midst of updating all components of the system to be fully WIOA compliant by 7/2016. The new system helps the state support coordinated implementation strategies in the following way:

• It will be 100% WIOA compliant. • It is more stable than the CTWBS system built on newer technology and supported in 20 other states nationwide. • Internet based with multiple redundant services ensures stability and lessen chance of lost data. • Unique State identifier for clients will enhance PII and meet federal requirements for privacy. • Wagner-Peyser staff is able to create, maintain and take services from a workshop calendar for multiple attendees’ in one transaction. • ETPL allows providers to enter required follow-up data to ensure programs are meeting the needs of participants and are WIOA compliant. • Robust reporting system will allow staff to track and follow participants to ensure mandated reporting periods are accurate. • Built in Case Management application WIZARDS ensure that the data gathered is verified properly in a timely fashion based on compliance. • The vendor Geographic Solutions is responsible for maintenance and ensuring edits are made based on changing laws and regulations.

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

Connecticut Department of Labor (CTDOL) Data collection for the six core WIOA programs (Adult, Dislocated Worker, Youth, Wagner–Peyser, Adult Education and Literacy Activities, and Title 1 of the Rehabilitation Act of 1973) will occur within separate case management systems located at each of three State agencies including the Connecticut Departments of Labor (CTDOL), Education (CSDE), and Rehabilitation Services (DORS).

CTDOL has contracted with Geographic Solutions to implement a web–based case management system – CTHires – by the close of December 2015, to provide virtual services to individual
jobseekers and employers, and to collect data required by WIOA for reporting on self–services and staff–assisted services for the Adult, Dislocated Worker, Youth, Wagner–Peyser, and Trade Adjustment Assistance (TAA) programs. The CTHires system is planned for expansion in 2016 to incorporate the TANF/Jobs First Employment Services Program, Foreign Labor Certification Program, and the Work Opportunity Tax Credit (WOTC) Program. CTDOL will explore data collection opportunities with CTDS to determine data collection and reporting needs between WIOA, TANF, HUSKY and SNAP E&T. Connecticut State Department of Education (CSDE) All adult education providers funded by the Connecticut State Department of Education (CSDE), Bureau of Health/Nutrition, Family Services and Adult Education, collect and report through the Connecticut Adult Reporting System (CARS). The data entered in CARS are used by CSDE to meet reporting requirements at the Federal and State levels. CARS data are the basis for completing the Federal reporting requirements of the National Reporting System (NRS).

CARS is a longitudinal database containing student information. The Student ID created for each new student in CARS is unique to that student across adult education providers and fiscal years. Students returning to adult education in a future fiscal year maintain the same CARS Student ID. Students who transfer from one adult education provider to another, or prepare in adult education and then register for the GED test are also able to utilize the same CARS student ID.

Connecticut Department of Rehabilitation Services (DORS) DORS has a contract with a software provider to maintain a case management system for the vocational rehabilitation programs. This system runs locally on servers housed within DORS and contains case information relevant to individual consumers and reportable data. The vendor has maintained an active relationship with the Rehabilitation Services Administration (RSA) who governs data collection for public vocational rehabilitation programs. Modifications to the system are currently being planned to manage the upcoming changes in data collection required by WIOA. RSA data elements will be adjusted to be compatible with the WIOA–Participant Individual Record Layout (PIRL) document.

WIOA Annual State and Local Area Reporting Reporting processes for the WIOA Annual State Performance Report will involve CTDOL obtaining electronic files for each report period from the three Connecticut State agencies for each of the six WIOA core programs. The WIOA Annual Local Area Performance Report is a subset of the WIOA Annual State Performance Report, covering only the Adult, Dislocated Worker, and Youth programs. Individual records in each of these electronic program files will be matched against the CTDOL database that stores the WIOA unique identifiers to determine if such identifier already exists. If it exists, the unique identifier will be appended to the record. If it does not exist, CTDOL will assign a unique identifier for each participant and will append it to the participant record. This process will ensure a common unique identifier across the six WIOA core programs, and will ensure that this unique identifier will be the same for every period of participation.

These same electronic files will be matched to each of the electronic files for each of the six WIOA core programs to determine if an individual was co–enrolled in one or more of those programs. If the participant was co–enrolled in another core program, the specific code value identified in the WIOA Participant Individual Record Layout (PIRL) that applies to those services will be appended to the participant record.

These same electronic files will be used to obtain employment information for each program participant who has a social security number and an exit date from one or more of the six WIOA core programs. CTDOL currently is responsible for reporting wages, entered employment rates, and employment retention rates for individuals who exit the Wagner–Peyser, Adult, Dislocated Worker,
Youth, and Trade Adjustment Assistance programs. CTDOL’s responsibilities will expand to include individuals who exit from all six WIOA core programs, thereby appending wage and employment information to each individual exiter’s record.

Each program’s electronic file containing the assigned WIOA unique identifier, co–enrollment data, wages, and employment information will be returned to each of the three State agencies for use in their Federal report submissions.

Eligible Training Provider (ETP) Performance Report CTDOL will use the new CTHires case management system to collect data and generate the Eligible Training Provider Performance Report on all students in programs, and on WIOA participants, as required under WIOA.

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


As lead administrative entity for WIOA implementation in Connecticut, CTDOL has responsibility to ensure that an appropriate and comprehensive set of state workforce system policies is established and are in place to guide effective WIOA implementation. CTDOL has demonstrable experience and expertise in this role, having been responsible for administrative oversight and direction of Workforce Investment Act (WIA) implementation in Connecticut for the past 16 years. Building on a foundation of administrative policy developed during that time, CTDOL Administration is systematically drafting and developing the necessary inventory of WIOA–related workforce system policies. This is a work-in-progress that will continue through the weeks and months ahead. The policies generated by this process may be generated and/or reviewed by a transitional steering committee or CETC as appropriate. Key workforce strategies will include industry partnerships, sector–focused initiatives and career pathways projects.

CETC in partnership with CTDOL is currently developing a policy regarding partner programs’ contributions to the One–Stop delivery system including methods of funding the One–Stop infrastructure.

Data Collection and Reporting Connecticut Department of Labor (CTDOL) maintains and operates an automated Workforce Development Business System to support the operational and management needs of the State of Connecticut’s One–Stop employment service delivery system under the Workforce Innovation and Opportunity Act (WIOA). To address these operational, management, and reporting needs, CTDOL requires that state and contractor staff funded under the
WIOA Adult, Dislocated Worker, Youth, and Wagner–Peyser programs enter data into the new CTHires system. Staff delivering services under the Trade Adjustment Assistance program also record data for this federal program into the new CTHires system. Current plans are to incorporate the Jobs First Employment Services program into the new CTHires system in 2016. JFES–funded staff currently record data in the CTDOL CTWBS legacy system.

CTDOL also requires authorized representatives of contractor agencies funded under WIOA Adult, Dislocated Worker, and Youth programs to sign a Data Access Agreement, to ensure the protection of Personally Identifiable Information (PII) in their possession. United States Department of Labor (USDOL), Training and Employment Guidance Letter (TEGL) No. 39.11 is appended to the Data Access Agreement. In addition, staff members of these agencies that will access the new CTHires system are required to sign a form entitled Acknowledgment of Receipt of Confidential Information to advise them of responsibilities with respect to confidential information.

CTHires supports appropriate co-enrollment of participants through its system design. Wagner–Peyser participants who require additional training are referred to WIOA services. Upon the completion and verification of their application via the CTHires WIOA wizard, eligible applicants are enrolled for participation in the WIOA program. Participants applying directly for WIOA services must first, be registered for Wagner-Peyser in the CTHires system prior to participation in WIOA services. Out-of-school Youth who are age appropriate and are encouraged to co-enroll in WIOA Adult Services which the system accommodates. TAA co-enrollment is mandatory via policy effective 9/29/2015.

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.

Department of Rehabilitation Services The Department of Rehabilitation Services (DORS) provides a wide range of services to individuals with disabilities, children and families who need assistance in maintaining or achieving their full potential for self–direction, self–reliance and independent living. The primary customers of the agency are individuals with disabilities. In the employment–based programs, business/employers are a dual customer. The DORS mission is to maximize opportunities for people in Connecticut with disabilities to live learn and work independently.

DORS is divided into four major bureaus: 1. The Bureau of Disability Determination; 2. The Bureau of Education and Services for the Blind; 3. The Bureau of Rehabilitation Services; and 4. The Bureau of Organizational Support.

DORS is the designated state agency for the Bureau of Education and Services for the Blind (BESB) and the Bureau of Rehabilitation Services (BRS).

Consumers with disabilities who need help finding employment may apply for assistance at the applicable DORS offices. They may seek help with their job search when their disability poses a barrier and when they need VR services to help them prepare for, enter into or maintain gainful employment in a competitive setting. Services may include vocational counseling, benefits counseling, job search assistance, skill training and career education, school–to–work transition
services, on–the–job training in business and industry, assistive technology services for mobility, communication and work activities, vehicle and home modifications, supported employment services, restoration services for a physical or mental condition and assistance accessing transportation options. Once eligibility has been determined, consumers work with a VR counselor to develop an Individualized Plan for Employment (IPE) to identify the target employment goal and the services that DORS can provide to assist them in reaching that goal. The IPE also identifies the consumer’s responsibilities to help reach the desired job goal.

CT Department of Education. The Connecticut State Department of Education is committed to quality adult education programs which are accessible to all Connecticut adults and lead to mastery of the essential proficiencies needed to function as productive citizens in work, family and community environments.

Connecticut's adult education programs are governed by Connecticut General Statutes, which require local school districts to offer education programs necessary to acquire basic literacy skills, elementary education, English language proficiency, secondary school completion and/or preparation for equivalency or proficiency examinations. Local school districts and other eligible agencies providing mandated adult education programs are reimbursed by the Connecticut State Department of Education on a cost–sharing, sliding scale based on the relative wealth of a district. By supplementing Connecticut’s commitment of state and local adult education dollars with WIA Title II dollars, Connecticut expands its provider network while enhancing and supporting programs and services that are more comprehensive, cost–effective and responsive to community needs. In addition to the local school districts, volunteer programs, community based organizations and other agencies provide adult education services in Connecticut by recruiting and retaining educationally and economically disadvantaged adults. By focusing on the needs of learners, families, communities and employers, adult education programs succeed in improving the skills of Connecticut's learners, enabling thousands of residents to attain a secondary school diploma, helping to close the skills gap in the workplace, assisting non–English speakers to learn English, easing the transition to post–secondary education, preparing residents to attain U.S. citizenship and helping families to break the intergenerational cycle of illiteracy.

CT Department of Labor. The Connecticut Department of Labor is committed to protecting and promoting the interests of Connecticut workers. In order to accomplish this in an ever–changing environment, we assist workers and employers to become competitive in the global economy. We take a comprehensive approach to meeting the needs of workers and employers, and the other agencies that serve them. We ensure the supply of high–quality integrated services that serve the needs of our customers.

The CT Department of Labor’s Employment and Training Division is comprised of four units including Employment Services Operations, Quality Program Review, Welfare–to–Work, and Performance and Accountability. Administrative responsibilities for the programs that reside in this division include but are not limited to policy and procedure development, monitoring, development of grants and contracts, reporting, and management information system support. This division administers four of the six core programs including: Wagner–Peyser, and the WIOA Adult, Dislocated Worker, and Youth programs. This division also administers the Trade Adjustment Assistance program, WIOA National Emergency Grants (NEGs), Foreign Labor Certification/Migrant Seasonal Farmworker, Work Opportunity Tax Credit program, the Jobs First Employment Services (JFES) program, and various other state and federally funded employment and training programs. This division also collaborates primarily with the Unemployment Operations Division to administer and deliver services under the Worker Profiling and Reemployment Services also referred to as
Enhanced Reemployment Services, and UI Reemployment Services and Eligibility Assessments (RESEA) which is replacing UIREA.

CT Department of Labor (CTDOL) Employment and Training Division central office also directly delivers employment and training services under several of these programs including but not limited to: Wagner–Peyser centralized job bank, Foreign Labor Certification/Migrant Seasonal Farmworker, and the Work Opportunity Tax Credit programs. CTDOL local office staff members deliver direct services within American Job Centers under the Wagner–Peyser, Trade Adjustment Assistance, Unemployment Insurance, and Veterans programs. Examples of services provided under these programs include: assessment of skills, vocational counseling, provision of labor market and other information, provision of referrals to employment and to supportive services for individuals, recruitment services for employers, unemployment insurance, and rapid response assistance for employers and their employees. These services are designed to assist individuals to obtain employment to ultimately achieve self-sufficiency, and to assist employers to secure qualified employees to assist them to become competitive.

CTDOL’s Unemployment Insurance (UI) Operations, UI Tax, and ES Board of Review are separate divisions within CTDOL. These divisions work closely with the Employment and Training Division and the local American Job Centers to provide seamless customer services.

CT Department of Social Services CTDSS provides a wide range of services to children, families, older adults, persons with disabilities, and other individuals who need assistance in maintaining or achieving their full potential for self-direction, self-reliance and independent living. CTDSS delivers a wide variety of services to children, families, adults, people with disabilities and the elderly, including health care coverage, food and nutrition assistance, child support services, independent living services, energy assistance, and program grants. CTDSS administers Medicaid and the Children’s Health Insurance Program; the Supplemental Nutrition Assistance Program and the Temporary Assistance for Needy Families program, among others. With a staff of about 1,900, the department provides services to more than 1 million Connecticut residents of all ages.

Please refer to the following for State Agency Organization:


Please refer to the following for State Agency Organizational Charts:

http://www.ctdol.state.ct.us/OWC/WIOA%20USP%20DORS%20Org%20Chart.docx

http://www.ctdol.state.ct.us/OWC/WIOA%20USP%20SDE%20Org%20Chart.pdf

The CT DOL organizational chart is in the process of being updated.

B. STATE BOARD

Provide a description of the State Board, including—
1. MEMBERSHIP ROSTER

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

The twenty-four voting members of the Connecticut Employment and Training Commission (CETC), the State Workforce Board under WIOA, and their professional affiliations, include: • Donald Shubert, CETC Chair/Connecticut Construction Industries Association • Roderick Bremby/Connecticut Department of Social Services • Christopher Bruhl/Business Council of Fairfield County • Andrea Comer/Connecticut Business and Industry Association Education Foundation • Chris DiPentima/Pegasus Manufacturing • Elliot Ginsberg/Connecticut Center for Advanced Technology • Mark Ojakian/Board of Regents for Higher Education • John Harrity/Connecticut State Council of Machinists • Carlton Highsmith/SPG PaperWorks (Retired) • Lawrence McHugh/Middlesex County Chamber of Commerce • Deborah Monahan/Thames Valley Council for Community Action • Raymond Oneglia/O&G Industries • Norma Ortega/Travelers Companies • Scott Jackson/Connecticut Department of Labor • Lori Pelletier/Connecticut AFL–CIO • Amy Porter/Connecticut Department of Rehabilitation Services • Stuart Rosenberg/St. Francis Hospital and Medical Center/Johnson Memorial Hospital • JoAnn Ryan/Northwest Connecticut Chamber of Commerce • Catherine Smith/Connecticut Department of Community and Economic Development • Jeff Smith/Pratt and Whitney • Paul Timpanelli/Bridgeport Regional Business Council • Dianna Wentzell/Connecticut State Department of Education • Lyle Wray/Capitol Region Council of Governments • Lieutenant Governor Nancy Wyman/State of Connecticut

2. BOARD ACTIVITIES

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

The organizational structure of the Connecticut Employment and Training Commission (CETC) – the State Workforce Board is described above. Leadership of CETC in conducting its business as the State Board is provided by Chairman Donald J. Shubert, President of the Connecticut Construction Industries Association (CCIA). Mr. Shubert has served as CETC Chair since his appointment by Governor Malloy in August 2011. A respected business leader in Connecticut, providing expert knowledge about and representing the crucial construction industry sector, Mr. Shubert is an experienced and effective leader of CETC. Mr. Shubert is well aware of CETCs statutory obligations, and demonstrably capable of working effectively with members from business, labor and government to achieve consensus in meeting CETC’s strategic and operational responsibilities.

CETC’s organizational structure described above is intended to be flexible, adjustable as necessary to meet changing circumstances. The CETC’s committee structure will ensure that CETC is prepared to meet its State Board functions and accountabilities. Committees are constructed to engage individual CETC members in working on topics and in areas to which they bring relevant professional experience and expertise, to contribute productively in meeting each committee’s responsibilities and deliverables. To supplement the work of CETC’s committees, Chairman Shubert may appoint additional, time limited, CETC work teams on an as-needed basis.

The Office of Workforce Competitiveness (OWC) provides professional staff expertise and technical assistance to support the Governor and CETC’s efforts in meeting its Federal and State statutory responsibilities. OWC is housed in the Connecticut Department of Labor (CTDOL) and has ready access to their workforce, research and legal experts.
OWC and CETC act as workforce development policy advisors to the Governor. OWC collaborates with multiple partners and workforce system stakeholders to help align resources, coordinate strategy, promote policy and synchronize employment, education and training programs and services to address industry’s job growth needs and achieve the vision and goals discussed previously in this Unified State Plan. OWC’s Executive Director works closely with the CETC Chair to ensure that State Workforce Board functions are implemented consistently, effectively and efficiently. CTDOL is committed to support the efforts of OWC and CETC by offering additional professional expertise and support from other units as appropriate and as necessary. Staff expertise from other State agency partners is also solicited when necessary.

In addition, State Board members were provided with an introduction to WIOA at this year’s fall and winter meetings. As we proceed with WIOA implementation, members will be provided the following to assist in carrying out State Board functions:

1. A member orientation and other capacity building activities as needed;
2. A CETC convening over the winter will be scheduled to consider progress to date, local plans, and review of LMI information to identify topics for future consideration;
3. CETC member engagement in partner meetings and events, and local Board meetings;
4. A workforce development calendar of partner and WDB meetings and events will be developed for CETC members.

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

A. ASSESSMENT OF CORE PROGRAMS

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

The Connecticut Departments of Labor (CTDOL), Education (CSDE), and Rehabilitation Services (DORS), will use the primary indicators of performance specified in section 116(b) of WIOA and contained in State Performance Reports to assess the performance of the six core programs. Each program’s actual performance will be assessed in relation to the State adjusted levels of performance and revised State adjusted levels of performance. Connecticut does not have any additional indicators of performance referenced in section 116(b)(2)(B) as part of this Unified State Plan.

This State assessment will utilize quarterly wage records to determine program quality and effectiveness with respect to outcomes including employment rates and median earnings for participants with a social security number that exited from one or more of the six core programs. Also, the average cost of those participants who received career and training services, respectively, during the most recent program year and the 3 preceding program years will be assessed, while considering relevant economic conditions e.g., unemployment rates and characteristics of participants.
Additionally, CTDOL will use the Local Area Performance Report broken down by local area for the WIOA Adult, Dislocated Worker, and Youth programs to determine each local area’s performance on the primary indicators with respect to local performance targets.

The CETC in coordination with the State WIOA Administration will provide on-going evaluation of core programs through the evaluation of activities in order to promote continuous improvement in the following ways:

1. Establish a policy for continuous improvement of core programs which includes:
   a. Surveys
   b. CTHires integration
   c. Analytical and Statistical methods.
   d. Other methods as deemed appropriate

2. The mechanism for providing this review will be established and maintained by the CETC in conjunction with the state programs responsible for core programs and the local boards.

3. The tool selected to be used for evaluations will include customer feedback and outcome and process measures and employ rigorous analytical and statistical methods.

4. The state will prepare reports regarding the evaluations and make them available to core partners, boards and the public on a yearly basis.

B. ASSESSMENT OF ONE-STOP PARTNER PROGRAMS

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

Connecticut’s Unified State Plan outlines a four-year strategy for the six core programs: • The Adult Program (Title 1 of WIOA) • The Dislocated Worker Program (Title 1) • The Youth Program (Title 1) • The Adult Education and Family Literacy Act Program (Title II), • The Vocational Rehabilitation Program – BESB (Title 1 of the Rehabilitation Act of 1973, as amended by Title IV,) and • The Vocational Rehabilitation Program – BRS (Title 1 of the Rehabilitation Act of 1973, as amended by Title IV.) Assessment of these core programs will be done by the respective administrative State agency. Other One–Stop delivery system partner program services included in the Workforce Performance Accountability, Information, and Reporting System that are reportable to USDOL will be assessed annually using outcome measures on the Program Performance Scorecard e.g., employment rate, and median earnings.

CTDOL will explore assessment for performance accountability with CTDSS to determine application and feasibility between WIOA, TANF and SNAP E&T.
C. PREVIOUS ASSESSMENT RESULTS

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

D. EVALUATION

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

The State intends to examine potential subject areas to conduct evaluations or research. Any projects will be conducted in collaboration with WIOA partners, including the local workforce development boards. Consideration will be given to past evaluations to ensure that future ones are valuable use of State and local resources. The nature and type of these projects will unfold throughout WIOA implementation and will at a minimum focus on factors effecting program outcomes. Evaluations provided by Federal agencies will also guide the direction of State efforts.

The CETC currently develops an annual report card on employment and training programs considering an array of programs that are related to one or more of the following four results: • CT adults who are financially self-sufficient • CT students ready for work and post-secondary education following high school graduation • A competitive 21st century CT economy • A highly skilled, competitive 21st century CT workforce

The production of this report card informs the workforce system so that workforce-related policies, investments, strategies and programs contribute measurably to one or more of the above results.

5. DISTRIBUTION OF FUNDS FOR CORE PROGRAMS

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

A. FOR TITLE I PROGRAMS

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

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

Detail and policy regarding the methods and factors the State will use in distributing title I Youth funds to local areas can be found in the State WIOA draft manual as follows:
Minimum Provision- Hold Harmless- No local area shall receive an allocation in any program which is less than 90% of the average allocation for the previous two years.

Connecticut has five local Workforce Development Areas. WIOA funding is allocated to Adult and Youth by area based on the following formula:

- 1/3 unemployed in the Areas of Substantial Unemployment (ASU – a contiguous area with an average unemployment rate of 6.5% or greater);
- 1/3 excess unemployed greater than 4.5 percent.
- 1/3 total number of individuals in Connecticut who are economically disadvantaged
- Economically Disadvantaged Youth are youth who are between the ages of 16-21.

For Certified Dislocated Workers CTDOL uses the CTDOL Department of Research labor market information to determine formulas and award allocations.

- Total Insured Unemployed 5%
- Declining Industries 5%
- Long Term Unemployed 25%
- Plant Closings/Mass Layoffs 30%
- Total Unemployment Concentration 35%
- Farmers/Rancher economic hardship data thru the most current year 0%

- According to the 2014 US Census Bureau American Community Survey Connecticut’s % of population (16+) working in the Agriculture and mining sector is five times smaller than the US average 0.4% (CT) vs 2% (US).

- According to USDA 2012 Agricultural Census, the total value of Connecticut’s agricultural product sales is one-tenth of one percent of the US total. $550 million vs. $394 Billion.

- The agricultural economy is insignificant in Connecticut as compared to other states in the US. Basing our WIOA allocations in any way on agricultural labor markets would distort this allocation relative to the actual composition of Connecticut’s labor markets.

Each data element is weighted as indicated in the above percentages. Percentages remain set unless changed by the CETC.
2. ADULT AND TRAINING ACTIVITIES IN ACCORDANCE WITH WIOA SECTION 133(B)(2) OR (B)(3),

Detail and policy regarding the methods and factors the State will use in distributing title I Youth, Dislocated Worker and Adult funds to local areas can be found in the State WIOA draft manual as follows:

Minimum Provision- Hold Harmless- No local area shall receive an allocation in any program which is less than 90% of the average allocation for the previous two years.

Connecticut has five local Workforce Development Areas. WIOA funding is allocated to Adult and Youth by area based on the following formula:

• 1/3 unemployed in the Areas of Substantial Unemployment (ASU – a contiguous area with an average unemployment rate of 6.5% or greater); • 1/3 excess unemployed greater than 4.5 percent. • 1/3 total number of individuals in Connecticut who are economically disadvantaged • Economically Disadvantaged Youth are youth who are between the ages of 16-21.

For Certified Dislocated Workers CTDOL uses the CTDOL Department of Research labor market information to determine formulas and award allocations.

• Total Insured Unemployed 5% • Declining Industries 5% • Long Term Unemployed 25% • Plant Closings/Mass Layoffs 30% • Total Unemployment Concentration 35% • Farmers/Rancher economic hardship data thru the most current year 0%

o According to the 2014 US Census Bureau American Community Survey Connecticut’s % of population (16+) working in the Agriculture and mining sector is five times smaller than the US average 0.4% (CT) vs 2% (US).

o According to USDA 2012 Agricultural Census, the total value of Connecticut’s agricultural product sales is one-tenth of one percent of the US total. $550 million vs. $394 Billion.

o The agricultural economy is insignificant in Connecticut as compared to other states in the US. Basing our WIOA allocations in any way on agricultural labor markets would distort this allocation relative to the actual composition of Connecticut’s labor markets.

Each data element is weighted as indicated in the above percentages. Percentages remain set unless changed by the CETC.

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

Detail and policy regarding the methods and factors the State will use in distributing title I Youth, Dislocated Worker and Adult funds to local areas can be found in the State WIOA draft manual as follows:

Minimum Provision- Hold Harmless- No local area shall receive an allocation in any program which is less than 90% of the average allocation for the previous two years.
Connecticut has five local Workforce Development Areas. WIOA funding is allocated to Adult and Youth by area based on the following formula:

- 1/3 unemployed in the Areas of Substantial Unemployment (ASU – a contiguous area with an average unemployment rate of 6.5% or greater);
- 1/3 excess unemployed greater than 4.5 percent.
- 1/3 total number of individuals in Connecticut who are economically disadvantaged

Economically Disadvantaged Youth are youth who are between the ages of 16-21.

For Certified Dislocated Workers CTDOL uses the CTDOL Department of Research labor market information to determine formulas and award allocations.

- Total Insured Unemployed 5%
- Declining Industries 5%
- Long Term Unemployed 25%
- Plant Closings/Mass Layoffs 30%
- Total Unemployment Concentration 35%
- Farmers/Rancher economic hardship data thru the most current year 0%

- According to the 2014 US Census Bureau American Community Survey Connecticut’s % of population (16+) working in the Agriculture and mining sector is five times smaller than the US average 0.4% (CT) vs 2% (US).

- According to USDA 2012 Agricultural Census, the total value of Connecticut’s agricultural product sales is one-tenth of one percent of the US total. $550 million vs. $394 Billion.

- The agricultural economy is insignificant in Connecticut as compared to other states in the US. Basing our WIOA allocations in any way on agricultural labor markets would distort this allocation relative to the actual composition of Connecticut’s labor markets. Each data element is weighted as indicated in the above percentages. Percentages remain set unless changed by the CETC.

**B. FOR TITLE II:**

**1. MULTI-YEAR GRANTS OR CONTRACTS**

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

Through CSDE, the State of Connecticut will award multi-year grants to eligible providers through a Request for Proposals (RFP) process to enable providers to develop, implement and improve adult education and literacy activities. Grantees will have the opportunity to continue for a second year depending upon satisfactory performance and funding from Congress.

Agencies who have demonstrated effectiveness are eligible for funding through the Connecticut State Department of Education (CSDE) may include: a. A local educational agency; b. A community–based organization or faith–based organization; c. A volunteer literacy organization; d. An institution of higher education; e. A public or private nonprofit agency; f. A library; g. A public housing authority; h. Other nonprofit institutions that have the ability to provide adult education and literacy activities to eligible individuals; i. A consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described above; j. A partnership between an employer and an entity described above.
CSDE will make funding available in each of Connecticut’s five designated local workforce areas. In conjunction with each WDB, CSDE will help to assess local area needs and WIB goals. In each local area, funds will be divided among defined priorities on a percentage basis. Eligible providers will select the appropriate priority area when drafting and submitting the proposal to CSDE.

CSDE will use the 13 WIOA considerations for funding to award grants, including the following consideration: “past effectiveness of the eligible provider in improving the literacy of eligible individuals, to meet State–adjusted levels of performance for the primary indicators of performance”, described in WIOA section 116, especially with respect to eligible individuals who have low levels of literacy. Past effectiveness will be evidenced by meeting or exceeding performance measures based on documentation from the Connecticut Adult Reporting System database and annual reviews of previously funded providers, and evidenced by comparable objective performance measures demonstrating successful student outcomes for new eligible providers.

Information regarding the selection of Service Providers and Provider Agreements can be found in the draft WIOA Policy manual under:

SERVICE PROVIDER SELECTION PROCESS AND PROVIDER AGREEMENTS

Specifically as follows:

This Section is designed to provide information on the service provider selection process and the provider agreements entered into with the selected providers.

I. Service Provider Selection

Service providers should be selected through a competitive request for proposal process. The Request for Proposal (RFP) process assures that operators and programs are responsive to workforce development needs in each area.

The RFP process is managed by each WDB. The RFP process is generally conducted every year but the period of time between the RFP process may be extended. Agreements/contracts with the selected providers will be renewed annually during that agreement/contract period based on available funding and successful program performance.

Following the distribution of funds by CTDOL the WDB’s will select providers and funding for Youth, Adult and Dislocated Workers.

II. Provider Agreements

The RFP process will allow for provider agreements with single providers or multiple co-contracting providers. In the case of multiple co-contracting providers, the division of awarded funds is determined by the co-contracting providers through a negotiation process. The negotiation process should take into account the scope of service and proposed program operating plan; including the planned activities, planned enrollments and estimated costs of career and training services to be delivered.

Co-contracting service providers may choose to negotiate a different split of funds with each contract renewal to reflect changes in service delivery; or maintain the same split as the previous contract.
All potential providers may complete an application made available within the CTHires system.

Demonstrated effectiveness of programs can be found in the attached draft of the WIOA Policy Manual under Eligibility Factors which indicate:

Eligibility Factors

The Workforce Innovation and Opportunity Act (WIOA) includes certain criteria that must be met in order ensure that a provider of programs offers the highest quality training services and is responsive to in-demand and emerging industries by providing training services for those industries (WIOA §122(b)(4)(A)). The entity shall provide verifiable program-specific performance information based on criteria established by the state (WIOA §122(b)(4)(C)) to support the entity’s ability to serve program participants. Pursuant to WIOA §122(b)(4)(D)(i-iv), an entity seeking initial eligibility as a provider of training services must meet the following criteria:

• A factor related to indicators of performance as described in WIOA §116(b)(2)(A)(i)(I-IV) as set by Connecticut Department of Labor ETPL policy.

For an entity’s initial eligibility under WIOA (first year), the entity must document that it meets at least one of the following by submitting performance data:

• Median Earnings (Quarterly basis) - $3,459.00
• Average Wage at Placement - $9,344.00
• Attainment of a Post-Secondary Credential - 60%
• Completion Rate - 60%
• Employment Rate - 65%
• Training-related Employment Rate - 65%

For each program to be offered on the ETPL, documentation must include the program name and the most recent annual data that is available (for example, 7/1/14 - 6/30/15 or 7/1/15 - 6/30/16) for ALL individuals enrolled in the program for at least one of the factors above. The timeframe that the data is from must be stated on the documentation. If the program is new to the entity and historical data is not available, data must be tracked upon ETP approval and submitted in accordance with the requirements described at “Performance and Reporting.”

• A factor concerning whether the provider is in a partnership with business. Consideration for satisfying this factor will include active involvement (not just membership) in: a local Chamber of Commerce, the Connecticut Business and Industry Association (CBIA) or other local business association, Connecticut Workforce Development Board, Advisory Boards (colleges/universities), clinical partnership agreements, internships/externships with businesses, and affiliations with business associations. Submit a list of partnerships and describe the nature of the partnership.
• Other factors that indicate high-quality training services. If the applying entity is required by Connecticut statute to be approved by the Connecticut Office of Higher Education, State Department of Education, or Department of Public Health to offer training, this Eligibility Factor will be deemed as met. All other entities must comply with federal and state ETP credential policies in order for this (high-quality) Eligibility Factor to be deemed as met. In regard to a program’s credential outcome, ALL applying entities’ program offerings must result in credential attainment that complies with federal and state ETP credential policies in order for the program to be considered for approval.

• A factor concerning alignment of the training services with in-demand industry sectors and occupations. To satisfy this factor, review the in-demand occupations listed on CTDOL’s website, http://www1.ctdol.state.ct.us/lmi/projections.asp, and provide documentation from the site to verify the training service is specifically related to an in-demand industry sector or occupation. Otherwise, provide information and documentation to show the extent to which the training service(s) aligns with the in-demand industry sectors and occupations displayed on this CTDOL website. In-demand occupations may vary at the local level; applying providers may consult with the lead WDB.

2. ENSURE DIRECT AND EQUITABLE ACCESS

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

To ensure direct and equitable access for all eligible providers, the Connecticut State Department of Education will publish a Notice of Availability in all major newspapers throughout Connecticut and post the notice on the CSDE’s web page as well as the web page of the core partners, Department of Rehabilitation Services and the Department of Labor. The RFP will be mailed to all local education agencies and higher education institutions; to a master list of current and past providers including community–based organizations, regional education service centers, housing authorities, volunteer organizations, Department of Correction, other correctional facilities and institutions; and to all current providers and WDBs. A Bidder’s Conference will be publicly advertised with the Notice of Availability and held at a central location to provide answers to questions regarding appropriateness of proposed projects and application procedures.

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.

Under the Rehabilitation Act, the Department of Rehabilitation Services (DORS) provides vocational services to individuals seeking employment through the Bureau of Rehabilitation Services (BRS) and the Bureau of Education and Services to the Blind (BESB).
6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

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

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

Connecticut has a plan under consideration to ultimately make the management information systems for the core programs interoperable. CTDOL’s new web–based CTHires system has four of the six core programs resident within it, including: WIOA Adult, WIOA Dislocated Worker, WIOA Youth, and Wagner–Peyser programs. This system also currently has resident within it the Trade Adjustment Assistance (TAA) program. This central database is contracted to expand in 2016 to include the Jobs First Employment Services welfare–to–work program, Foreign Labor Certification program, and the Work Opportunity Tax Credit program. CTHires also has the capability to add programs through a generic programs module.

Currently the Connecticut State Department of Education (CSDE) collects data and reports through the Connecticut Adult Reporting System (CARS) for the Adult Education and Family Literacy Act Program. Also, the Connecticut Department of Rehabilitation Services (DORS) has a case management system for the Vocational Rehabilitation programs within DORS. Long–term plans under consideration by the three State agencies include development of an interface among these separate systems to exchange common data elements efficiently. In the interim, batch processes are planned across the six core programs to enable each agency and program to generate required federal reports.

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

Connecticut has a plan under consideration to ultimately make the management information systems for the core programs interoperable. CTDOL’s new web–based CTHires system has four of the six core programs resident within it, including: WIOA Adult, WIOA Dislocated Worker, WIOA Youth, and Wagner–Peyser programs. This system also currently has resident within it the Trade Adjustment Assistance (TAA) program. This central database is contracted to expand in 2016 to include the Jobs First Employment Services welfare–to–work program, Foreign Labor Certification program, and the Work Opportunity Tax Credit program. CTHires also has the capability to add programs through a generic programs module.

Currently the Connecticut State Department of Education (CSDE) collects data and reports through the Connecticut Adult Reporting System (CARS) for the Adult Education and Family Literacy Act
Program. Also, the Connecticut Department of Rehabilitation Services (DORS) has a case management system for the Vocational Rehabilitation programs within DORS. Long–term plans under consideration by the three State agencies include development of an interface among these separate systems to exchange common data elements efficiently. In the interim, batch processes are planned across the six core programs to enable each agency and program to generate required federal reports.

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

Connecticut is hopeful of funding to enable alignment of technology and data systems across mandatory One–Stop partner programs. This future system would provide for a common intake and data collection across multiple agencies and programs. This alignment would improve service delivery to individuals by enabling data to be collected once and shared by service providers within the system, resulting in efficiencies. This common system would also foster communication and collaboration among service providers to ensure optimum service delivery using a variety of funding and resources while minimizing duplication of services. The Connecticut Employment and Training Commission (CETC) will assist the Governor align technology and data systems to improve service delivery by participating on interagency work groups to identify financial and other resources necessary to accomplish this work.

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

Connecticut has formed a WIOA transition interagency work group on Technology, Data and Outcomes. The work group and its technology subcommittee met several times to develop various options to enable reporting for the six (6) core programs across three state agencies – the Connecticut Departments of Labor (CTDOL), Education (CSDE), and Rehabilitation Services (DORS). Data collection for the six core programs (Adult, Dislocated Worker, Youth, Wagner–Peyser, Adult Education and Literacy Activities, and Title 1 of the Rehabilitation Act of 1973) will occur within separate case management systems located at each of three State agencies. CTDOL will explore assessment for performance reporting with CTDSS to determine application and feasibility between WIOA, TANF and SNAP E&T.

Reporting processes for the WIOA Annual State Performance Report will involve CTDOL obtaining electronic files for each report period from the three State agencies for each of the six core programs. The WIOA Annual Local Area Performance Report is a subset of the WIOA Annual State Performance Report, only for the Adult, Dislocated Worker, and Youth programs. Individual records in each of these electronic program files will be matched against the CTDOL database that stores the WIOA unique identifiers to determine if such identifier already exists. If it does exist, the unique identifier will be appended to the record. If it does not exist, CTDOL will assign a unique identifier for each participant and will append it to the participant record. This process will ensure a common unique identifier across the six core programs, and that this identifier will be the same for every period of participation.
These same electronic files will be matched to each of the electronic files for each of the six core programs to determine if an individual was co–enrolled in one or more of the six core programs. If the participant was co–enrolled in another core program, the specific code value identified in the WIOA Participant Individual Record Layout (PIRL) that applies to those services will be appended to the participant record.

Also, these same electronic files will be used to obtain employment information for each program participant who has a social security number and an exit date from one or more of the six core programs. CTDOL currently is responsible for reporting wages, entered employment rates, and employment retention rates for individuals who exit in the Wagner–Peyser, Adult, Dislocated Worker, Youth, and Trade Adjustment Assistance programs. CTDOL will continue this work and expand its responsibilities to include individuals who exit from all six core programs. Therefore, CTDOL will append wages and employment information to each exiter’s record.

Each program’s electronic file containing the assigned WIOA unique identifier, co–enrollment data, wages, and employment information will be returned to each of the three State agencies to use in their federal report submissions.

Eligible Training Provider (ETP) Performance Report CTDOL will use the new CTHires case management system to collect data and generate the Eligible Training Provider Performance Report on all students in programs, and on WIOA participants as required under WIOA.

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

B. ASSESSMENT OF PARTICIPANTS’ POST-PROGRAM SUCCESS

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

CT Department of Labor (CTDOL) will use the program performance scorecard and the WIOA Annual Statewide Performance Report Template to assess the progress of participants who are exiting from the WIOA Adult, Dislocated Worker, Youth, and Wagner–Peyser programs in entering or remaining in employment. The state assessment will use quarterly wage records to determine entered employment rates in the second and fourth quarters after exit for program individuals who exit with social security numbers to determine their success in entering or remaining in employment. Median earnings will also be considered to determine progress towards self–sufficiency. Local Workforce Development Boards will be responsible for following up with participants exiting from the WIOA Youth program to assess enrollment in, persistence in, and completion of postsecondary education.

Connecticut has not set any additional indicators of performance.
C. USE OF UNEMPLOYMENT INSURANCE (UI) WAGE RECORD DATA

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

The electronic files containing records for the six core programs will be used to obtain employment information using Unemployment Insurance Wage Record data for each program participant that has a social security number and an exit date from one or more of the six core programs. CTDOL is currently responsible for reporting wages, entered employment rates, and employment retention rates for individuals who exit in the Wagner–Peyser, Adult, Dislocated Worker, Youth, and Trade Adjustment Assistance programs. CTDOL will continue this work and expand its responsibilities to include individuals who exit from all six core programs. Therefore, CTDOL will append wages and employment information to each exiter’s record.

Each program’s electronic file containing the assigned WIOA unique identifier, co–enrollment data, wages, and employment information will be returned to each of the three State agencies for use in their federal report submissions.

Also, CTDOL will use the new CTHires case management system to collect data and generate the Eligible Training Provider Performance Report on all students in program and on WIOA participants, as required under WIOA. CTDOL will use Unemployment Insurance Wage data for employment rates, median earnings, and credential rates for all students in a program on the Eligible Training Provider Performance Report.

Unemployment Insurance Wage Record data will also be used to comply with federal evaluation requirements, and to inform workforce and labor market information available to customers.

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.

Connecticut Department of Labor • Information on individuals referenced for purposes of the WIOA Core Programs in the Connecticut Department of Labor’s automated One–Stop Career–Center system (CTHires) is considered confidential Personally Identifiable Information (PII) and may not be released or used for any purpose other than one directly connected with the administration of the programs. Information may also be released when the participant authorizes disclosure.

• Access to the system is provided upon an entity’s entrance into a Memorandum of Understanding with the Connecticut Department of Labor, which acknowledges the confidentiality and security requirements associated with the system. Moreover, every individual accessing the system must first sign an Acknowledgment of Confidential Information form, to ensure each individual is aware of such requirements.

• Finally, access to network components comprising the System is limited to authorized administrators, to ensure no unauthorized disclosure of PII. The system itself is configured to comply...
with Federal and State of Connecticut laws and regulations regarding the protection of confidential and PII, including but not limited to all sections of NIST SP 800–53 and IRS Publication 1075.

CT State Department of Education CSDE will ensure that program providers are compliant with all applicable laws and RFP guidelines including ADA 504 and Section 427 GEPA.
7. PRIORITY OF SERVICE FOR VETERANS

Describe how the State will implement and monitor the priority of service provisions for veterans in accordance with the requirements of the Jobs for Veterans Act, codified at section 4215 of 38 U.S.C., which applies to all employment and training programs funded in whole or in part by the Department of Labor. States should also describe the referral process for veterans determined to have a significant barrier to employment to receive services from the Jobs for Veterans State Grants (JVSG) program’s Disabled Veterans’ Outreach Program (DVOP) specialist.

Veterans and eligible spouses (Covered Persons) are given priority of service for receipt of employment, training and placement services provided under all US Department of Labor–funded programs. Veterans and eligible spouses are entitled to precedence for such services. This means that a Veteran or eligible spouse either receives access to a service earlier than others, or if resources are limited, the Veteran or eligible spouse receives access to the service instead of others. Veterans or eligible spouses should identify themselves as such when inquiring about any Connecticut Department of Labor (CTDOL) programs or services to take full advantage of this priority. The following definitions apply to CTDOL programs.

Intensive Services are available to maximize job training opportunities for Veterans with the following Serious Barriers to Employment (SBEs) as defined by VPL 03–14: 1. A special disabled or disabled veteran, as defined in 38 U.S.C. § 4211 (1) and (3) are those: A. 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, B. Discharged or released from active duty because of a service connected disability; 2. Homeless, as defined in Section 103(a) of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11302(a)); 3. A recently–separated service member, as defined in 38 U.S.C. § 4211(6), who at any point in the previous 12 months has been unemployed for 27 or more consecutive weeks; 4. An offender, as defined by WIA Section 101(27), released from incarceration within the last 12 months; 5. Lacking a high school diploma or equivalent certificate; or 6. Low–income (as defined by WIA at Sec. 101(25)(B)).

And those barriers amended by the Secretary to be identified as priority veterans.

Assessment and Management of Veteran Customers During the initial intake or registration, information will be solicited via Veterans Triage Form to determine the level of services needed. A specific criterion has been established to assess the veteran’s need for intensive or case management services. Such established criteria will include those outlined in CTDOL Memorandum 770 and Veterans Program Letter 03–14.

Once potential SBEs are identified, the veteran will be contacted by DVOP Specialists to setup an appointment to further assess the level of intensive services or if case management is necessary, as well as other supportive services available through the CTDOL or WIOA partners. Veterans with SBEs will be classified as job–ready or not job–ready. Veterans deemed not job– ready will receive intensive services from the DVOP Specialist, CTDOL Career Development Specialist, VA staff professionals, other WIOA partners, or supportive services to assist in resolving issues that hinder gainful employment. Services will include job search planning or employment development plan, career planning, resume writing assistance, professional counseling services, and any other supportive service to assist the veteran attain job–ready status.

Once the veteran is determined to be job–ready, the DVOP Specialist will work with the LVER to make employment connections while DVOP will continue to provide case management and
providing other intensive services as appropriate. Career guidance, educational employment assistance workshops or seminars, employment planning, specialized counseling services will all become an integral part of this process. CTDOL Career Development Specialists, VA and State of Connecticut Vocational Rehabilitation Counselors, and other social service case managers will be partners to assist the veteran overcome these barriers to employment. Homeless Veterans The existing networks of LVER and DVOP Specialists and homeless shelters within the workforce development areas will continue to be used to make services available to homeless veterans. Services to homeless veterans will be coordinated with the Homeless Veteran’s Reintegration Project (HVRP), Supportive Services for Veterans Families (SSVF), and Veterans’ Outreach Pilot Program (VOPP) through grants from the U.S. Department of Labor, U.S. Department of Veterans Affairs, and the State of Connecticut.

VA Vocational Rehabilitation Participants CTDOL has a long history of collaborating with state and federal agencies to provide services to veterans who may benefit from vocational rehabilitation. CTDOL continues to maintain those relationships and explore new approaches to improve effectiveness. An updated addendum to the Memorandum of Understanding (MOU) will be established between CTDOL and the Hartford Regional Office of the Department of Vocational Rehabilitation and Employment Services (VR&E) of the (USDVA) and the Veterans Employment and Training Services (VETS). This MOU will redefine the Partnership between those named, to assist veterans being served under the auspices of Title 38, Chapter 31 of the United States Code.

The State is aware that when it submitted its initial plan for review it contained inaccurate information on the definition of “significant barrier to employment” (SBE) and that in its place the following language from Veterans’s Program Letter NO. 03-14, Change 2 will be incorporated in the originals place as follows:

This priority of service indication has been added to the draft WIOA Policy manual under:

ADULT AND DISLOCATED WORKER ELIGIBILITY AND SERVICE PRIORITY

Service Providers must ensure a process for identifying covered persons at the point of entry including enrollment into workforce services, to allow covered persons to take full advantage of priority of service. Identification does not mean verification of veteran status. Self-identified veterans must be made aware of:

a. Their entitlement to priority of service;

b. The full array of employment, training, and placement services available under priority of service; and

c. Any applicable eligibility requirements for those programs and/or services.

All policies included in the draft WIOA manual are subject to monitoring and will be added to the monitoring tool currently under development.

The State is aware that when it submitted its initial plan for review it contained inaccurate information on the definition of “significant barrier to employment” (SBE) and that in its place the following language from Veterans’s Program Letter NO. 03-14, Change 2 will be incorporated in the originals place as follows:
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b. The full array of employment, training, and placement services available under priority of service; and

c. Any applicable eligibility requirements for those programs and/or services.

All policies included in the draft WIOA manual are subject to monitoring and will be added to the monitoring tool currently under development.

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

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

Connecticut’s One–Stop system currently provides and will continue to ensure physical and programmatic access to facilities, programs, services technology and materials for individuals with disabilities in a variety of ways. With respect to physical accessibility, all five of Connecticut’s comprehensive One–Stop American Job Centers, along with the Danielson American Job Center, are designated ADA–compliant. All five comprehensive American Job Centers provide adequate public parking for individuals seeking to use the facilities and have been determined to provide adequate accessible parking options for jobseekers with disabilities. Each of the comprehensive American Job Centers is located on a public bus route. Four of the five comprehensive American Job Centers feature power–assisted front doors. The CTDOL Facilities Unit is committed to pursue installation of power–assisted doors for the fifth office, in New London, when its current lease expires.

Assistive technology is available to assist jobseekers with disabilities in each of the comprehensive American Job Centers. These technologies include electric adjustable workstations, large screen visual magnifiers, TTY lines for deaf or hard of hearing customers, and large–font computer keyboards in the Career Center. Individuals seeking unemployment–related information or services will be assisted by a full–time CTDOL Unemployment Insurance staff expert located at and providing service from the front desk in each of the five comprehensive American Job Centers. These staff unemployment experts will be able to process paper unemployment claims directly, in–person, for
jobseekers with disabilities who may have difficulty filing applications over the phone or via the Internet.

In October 2013, Connecticut was one of eight states to receive a grant under USDOL’s Disability Employment Initiative (DEI). Awarded to OWC, the three–year $3,058,706 grant promotes strategic approaches to enhance employment services for individuals with disabilities served by the public workforce investment system.

As a critical innovative feature of this grant, Disability Resource Coordinators establish key partnerships across multiple workforce and disability service systems, coordinate services, and leverage funding to meet the needs of jobseekers with disabilities in the American Job Centers, assess and recommend solutions to physical, programmatic or communications accessibility workplace barriers. Working with DEI Case Managers: jobseekers with disabilities gain access to a wide range of employment assistance, including assessments, career readiness skills, training and education services. As required by DEI, two local WDBs – Northwest Regional Workforce Investment Board and Capital Workforce Partners (North Central area) – became active Employment Networks (ENs) in the Social Security Administration’s Ticket to Work Program, thereby expanding the Connecticut workforce system’s capacity to serve eligible beneficiaries. DEI also requires the State’s participation in an evaluation process to measure the project’s impact on outcomes for jobseekers with disabilities.

The DEI grant provides for extensive staff training to build the capacity of Connecticut’s One–Stop system to serve jobseekers with disabilities. In PY 2014, American Job Center staff received training on disability awareness and etiquette, universal design, cognitive limitations, mental health, American Sign Language, deafness and deaf culture. This common, cross–agency staff training will be continued as a key feature of Connecticut’s coordinated workforce system efforts going forward. Up–to–date assistive technology has been purchased and installed for the American Job Centers. Through DEI, CTDOL has collaborated successfully with several State agencies and community organizations to plan four regional Diverse Ability Career Fairs across Connecticut. The first was held in Rocky Hill in April 2015. Forty–eight employers participated, seeking to fill entry–level to advanced positions in a variety of industries including manufacturing, finance, healthcare, transportation, distribution, and education. More than 600 job seekers attended the event. The second Diverse Ability Career Fair took place in Waterbury in October 2015. Two remaining career fairs are planned for 2016.

The DEI experience in Connecticut is consistent with the long–established commitment of the state’s One–Stop system to recognize and meet the rights and needs of individuals with disabilities to access the facilities, programs and services of the workforce system. CTDOL, the Department of Rehabilitation Services (Bureau of Rehabilitation Services, and Bureau of Education and Services to the Blind) and the local WDBs have partnered together effectively for years to address the challenges confronting these valued customers. Lessons learned from these agency–to–agency, staff–to–staff shared experiences, and from the formal evaluation of the DEI experience, will be used to inform effective collaboration among key partners going forward in each local area to meet the objective of accessibility for all individuals and jobseekers.

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

Describe how the one-stop delivery system (including one-stop center operators and the one-stop delivery system partners) will ensure that each one-stop center is able to meet the needs of English
language learners, such as through established procedures, staff training, resources, and other materials.

As one component of the process of establishing certification criteria for One–Stop centers statewide, the Connecticut Employment and Training Commission (CETC), supported by the Office of Workforce Competitiveness (OWC), will require the Workforce Development Boards (WDBs) to document that each One–Stop center in their respective regions meets the service needs of English language learners. It is anticipated that overall certification criteria will be developed and proposed by the CETC committee overseeing service coordination for use by the WDBs, including an analysis of state–of–the–art best practices to ensure that LEP customer service needs are met. In reviewing the prospective certification of One–Stop centers, WDBs (in collaboration with the CTDOL WIOA Performance Administration Unit) will be expected to conduct an assessment of each One–Stop center’s capacity to address customers’ needs, assess and identify relevant assets in each center and the surrounding region, and map out a strategy identifying how the requisite staff, processes, technology, materials, resources and cross–program/cross–agency training will be provided to meet this service priority, for review and monitoring by the CETC committee overseeing service coordination.

The principle of ensuring accessibility will be a priority focus in CETC’s oversight of the statewide workforce system. CETC will establish specific accessibility criteria as a key feature of formal State administrative policy concerning the certification of One–Stop Centers in Connecticut.

The state has included the requirement providing that in order for One-Stops to be certified they must have staff which are available to aide customers who have limited English skills. This is contained in the draft WIOA Policy manual and will be subject to monitoring.
IV. COORDINATION WITH STATE PLAN PROGRAMS

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

The Connecticut Department of Labor (CTDOL) Office of Workforce Competitiveness (OWC) has lead responsibility for coordinating production of Connecticut’s WIOA Unified State Plan, including support and facilitation of the various WIOA Transition Work Groups (described on page 45) assigned to address specific required elements of the Plan and to assure alignment and integration of strategies and resulting workforce development activities across the various WIOA titles into a coherent document.

Key senior staff from State agencies responsible for all four WIOA core programs participated the WIOA Transition Work Groups – Service Design and Delivery; Business Engagement; Technology, Data and Outcomes; and Administration/Governance. Senior administrators from CTDOL (Title I and Title III lead administrative agency) were co–leaders of each Work Group. Work Groups included representatives from the Connecticut State Department of Education (CSDE) Bureau of Health/Nutrition, Family Services and Adult Education, and the Department of Rehabilitation Services (DORS) Bureau of Rehabilitation Services (BRS) and Bureau of Education and Services for the Blind (BESB), who participated and contributed content developed by each group, to address actions to enhance coordination of services across programs throughout the State’s workforce development system. In addition, senior CTDOL administrators/managers from Unemployment Insurance Program Operations and the Employment and Training Division responsible for oversight and administration of Wagner–Peyser program employment services, participated on the Work Groups.

While OWC is responsible for overall coordination in developing a single, coherent, comprehensive Unified State Plan, State agencies responsible for each core WIOA program had lead responsibility for managing a planning development process to address specific plan requirements for their assigned WIOA programs.

CSDE’s Bureau of Health/Nutrition, Family Services and Adult Education has lead responsibility for developing the Title II Adult Education Program plan content of Connecticut’s Unified State Plan. OWC staff worked directly with designated CSDE staff to assess the Unified State Plan production schedule, clarify content requirements and map out steps to align and integrate planning efforts. Designated CSDE staff participated as active members of the several WIOA Transition Work Groups. At CSDE’s invitation, OWC’s Executive Director reached out and participated at the September 2015 statewide Adult Education Policy Forum of local directors of adult education to review WIOA requirements, the planning process and opportunities for innovative collaboration of adult education and workforce development efforts at State and local levels.

CSDE engaged the services of an expert consultant to help produce the Title II/Adult Education and Literacy program content. CSDE conducted a needs assessment survey with local adult education program directors to develop key findings and identify trends, needs and priorities. This information was incorporated into the Unified State Plan. CSDE and OWC staff met and conferred on several occasions to coordinate and align the Unified State Plan drafting and Title II planning processes. The Title II program portion of the Unified State Plan was received and reviewed by OWC in early December. A joint effort was conducted to integrate the Title II content into the Unified State Plan.
draft, including intended coordination of implementation among WIOA partners and across core programs, specifically addressing service coordination for individuals and employers, engagement with the broader education system, and coordination with economic development.

CSDE will participate in ongoing efforts to coordinate program efforts covered by the Unified State Plan (including Title II) going forward. Education Commissioner Wentzell sits as a member of the Connecticut Employment and Training Commission (CETC), the State Workforce Board, to promote coordination among programs at the state level. Designated CSDE staff will continue to serve on various CETC Committees and Work Groups – partnering with colleagues from other State agencies with administrative responsibility for core WIOA programs (CTDOL and DORS) to promote coordination in implementation at system and program levels.

CTDOL’s Employment and Training Division has lead responsibility for developing the Title III Wagner–Peyser Program content of Connecticut’s Unified State Plan. Staff participated actively on the WIOA Transition Work Groups to inform development of plan content, to ensure coordination of planning for implementation of WIOA and related employment services, to make certain that Wagner–Peyser program services “fit” into the larger services coordination strategy contained in the Unified State Plan. Employment and Training Division staff developed the Title III plan content that was integrated into the Unified State Plan. Designated staff will continue to serve on and provide support to the various CETC committees and work groups – partnering with colleagues from CSDE, DORS and other State agencies to promote effective service coordination across programs.

The Department of Rehabilitation Services (DORS) Bureau of Rehabilitation Services (BRS) and Bureau of Education and Services to the Blind (BESB) have lead responsibility for developing the Title IV Vocational Rehabilitation Program content for Connecticut’s Unified State Plan. Designated BRS and BESB staff served on each of the WIOA Transition Work Groups, charged to collaborate with partners from other agencies in developing strategies to promote effective coordination of programs and services. OWC staff met and conferred with BRS and BESB staff on several occasions to review the status of Unified State Plan drafting and Title IV planning, to ensure alignment of focus and content during the drafting and production process. At the invitation of DORS Commissioner Porter, OWC staff attended the 2016 DORS/BRS Annual Meeting in October to provide information about WIOA, the Unified State Plan and planning process, local planning, opportunities for innovation and coordination, etc.

DORS posted a draft of its Title IV plans for public comment. The State Rehabilitation Councils and Advisory Board and Advisory Board approved those sections of the plan, which was then received and reviewed by OWC. A joint effort between OWC and DORS staff integrated the Title IV content into the Unified State Plan draft, including intended coordination of implementation efforts going forward. As with the Title II program, the Unified State Plan specifically addresses coordination of Vocational Rehabilitation Program services for individuals and employers, and coordinated engagement with the education system and economic development efforts.

Key administrators and staff from BRS and BESB will continue to participate in ongoing efforts to coordinate program efforts covered by the Unified State Plan going forward. DORS Commissioner Porter sits as a CETC member to promote coordination among programs at the state level. Designated DORS staff will continue to serve on and support the various CETC Committees and Work Groups – partnering with colleagues from CTDOL, CSDE and other key State agencies and stakeholders to promote/ensure coordination in implementing at the program level.
Details concerning coordination among the agencies and partners responsible for administration of core WIOA programs are provided in the appropriate sections of this Unified State Plan, including specific descriptions where required in the Adult Education and Literacy Act Program, Wagner–Peyser Act Program, and Vocational Rehabilitation Program sections, respectively.
V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that—

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

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

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

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

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

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

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

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

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

10. The State has a One-Stop certification policy that ensures the physical and programmatic accessibility of all One-Stop centers with the Americans with Disabilities Act of 1990 (ADA);  Yes
11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and  Yes

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

The State must address all program-specific requirements in this section for the WIOA core programs regardless of whether the State submits either a Unified or Combined State Plan.
PROGRAM-SPECIFIC REQUIREMENTS FOR ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES UNDER TITLE I-B

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

A. GENERAL REQUIREMENTS

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

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

Please refer to the following link for a map of CT’s workforce regions:

http://www.ctdol.state.ct.us/OWC/WIOA%20WDB%20Areas.docx

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.

In May, 2015, the Office of Workforce Competitiveness issued policy and procedures to chief elected officials for the initial designation of local workforce development areas, including the requirements of “performed successfully” and “sustained fiscal integrity” as defined in WIOA.

Requests for designation were required to be submitted by the existing local areas' chief elected official on behalf of the area's local elected officials. CT DOL staff subsequently reviewed requests and chief elected officials were notified of designation by OWC, on behalf of Governor Malloy.

As a starting point in the process of identifying workforce regions and planning regions, the Office of Workforce Competitiveness (OWC) took the lead role (on behalf of CETC and the Governor) to review relevant labor market information analysis provided by the CTDOL Office of Research to determine the viability of Connecticut’s existing five local workforce areas. Subsequent discussions were held with leaders of the local workforce development boards, including business leaders actively engaged in and knowledgeable about workforce development efforts in each of the existing workforce areas, leaders of regional business associations/chambers of commerce serving on CETC, regional planning councils and other workforce system stakeholders, to address pragmatic considerations of regional configurations.

Consistent with practical guidance received through these discussions with regional workforce development leaders, and on the merits of the LMI data analysis indicating no compelling reasons to change existing regional workforce boundaries, OWC (on behalf of CETC and Governor Malloy) then reached out to local designated chief local elected officials in each of the five existing workforce...
areas to propose designation of each as a local workforce area under WIOA. With the concurrence of the chief elected officials, OWC proposed designation of the five local workforce regions, which policy was subsequently endorsed by CETC and approved by Governor Malloy. Four of the five local areas received initial two-year designation as of July 1, 2016 with the fifth area initialing receiving a one-year initial designation. In June, 2016 this area was granted the second year designation through June 30, 2017.

Identification of Planning Regions

- In January 2016, the CT Labor Commissioner, Executive Director of the Office of Workforce Competiveness, CETC Chairman, and representatives from Governor Malloy’s office had a meeting to discuss regional planning. Current regional planning relationships were discussed as well as the desire to continue with statewide efforts in workforce development.

- The State of CT has engaged in grant-related regional planning activities with the WDBs. Examples of Multi-Regional Initiatives include:

1. In October, 2015, The Workplace was awarded a $14M, five-year grant will support the Southwestern Connecticut Health CareRx Academy (Academy) to provide career training and opportunities in health professions for low-income individuals. The Academy will serve Fairfield County and a portion of New Haven County.

2. The Northwest WIB is applying for two grants requiring regional planning - there is one called tech hires that will utilize Waterbury as the hub. The other is an Economic Development Administration grant for telecommunications infrastructure that will allow us to leverage it with the tech hires application. A team will discuss what the region will look like and it may very well expand beyond the Northwest to Stamford or to Hartford.

3. CWP and the Regional Employment Board of Hampden County MA participate on New England’s Knowledge Corridor Steering Committee. The New England Knowledge Corridor is an interstate partnership of regional economic development, planning, business, tourism and educational institutions that work together to advance the region’s economic progress and comprises the Hartford, Springfield and New Haven metro areas. Its goal is to preserve, create and maintain a sustainable, economically competitive, and equitable bi-state Knowledge Corridor Region.

4. EWIB and Workforce Alliance collaborated in planning and were awarded a $5.5M Ready to Work grant from US DOL. The CT Ready to Work Initiative will provide training, supports, and job placement services to 567 long-term unemployed workers in the fields of Information Technology, Engineering and Advanced Manufacturing.

- The CETC Chair and OWC Director will further address the identification of regions and regional planning at the Fall, 2016 meeting of the CT Workforce Development Council

- The CETC Planning and Performance Accountability Committee will be the entity that continues to steer and address these efforts.
C. PROVIDE THE APPEALS PROCESS REFERRED TO IN SECTION 106(B)(5) OF WIOA RELATING TO DESIGNATION OF LOCAL AREAS.

The newly created CETC Planning and Performance Accountability Committee (PPAC) has been assigned lead responsibility for developing proposed State policy addressing subsequent designation of local workforce areas, as an element of its proposed scope of work. As this new CETC committee gets organized, maps out its PY16 workplan, and becomes operational, it will develop this proposed policy for CETC review and action – ultimately for recommendation to the Governor. It is anticipated that the proposed policy will be developed by the PPAC for CETC review and action by the March 2017 CETC meeting.

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

The appeals process will be developed once the policy to determine shared infrastructure costs is developed.

The newly created CETC Service Design and Delivery Committee (SDDC) has been assigned lead responsibility for developing proposed State policy addressing appeals of determinations related to infrastructure funding, as an element of its proposed scope of work. As this new CETC committee gets organized, maps out its PY16 work plan, and becomes operational, it will develop this proposed policy for CETC review and action – ultimately for recommendation to the Governor. It is anticipated that the proposed policy will be developed by the SDDC for CETC review and action by the December 2016 CETC meeting.

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.

STATE OF CONNECTICUT

WORKFORCE INNOVATION AND OPPORTUNITY ACT

POLICY MANUAL

PROGRAM YEAR 2016 July 1, 2016 through June 30, 2017

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The purpose of the State Workforce Innovation and Opportunity Act (WIOA) Policy Manual is to provide policy guidance and interpretation of Federal and State workforce laws. Procedural guidance is also provided to assure consistency. The manual is intended for use in conjunction with Federal and State laws and regulations.

I. Authority

1. The CT Department of Labor Employment Services Division, WIOA Administration Unit in coordination with the Office of Workforce Competiveness (OWC), has been designated, to act on behalf of the Governor, as the oversight entity of the Workforce Innovation and Opportunity Act of 2014 [WIOA] (29 USC §2801 et. seq.) Title IB adult, youth and dislocated worker programs. As the designated oversight entity the OWC has been given the following responsibilities and authority: a. to write or modify any policies or procedures, which are necessary to interpret or clarify policies on behalf of the Governor; b. to waive, for good cause, any parts of the manual, which are not required by Law or Regulations; c. to interpret the manual; and d. to monitor for compliance with the Workforce Innovation and Opportunity Act.

2. All complaints and requests for waivers or interpretation of any part of this manual must be sent to the CT Department of Labor WIOA Administration Unit.
As required by Section 101(a) of the Workforce Innovation and Opportunity Act of 2014 the Governor established a State Workforce Innovation Board entitled “The Connecticut Employment and Training Commission” (CETC). The Governor’s appointments to CETC were made in compliance with the criteria in WIOA Section 101(b)(1).

A. State Board Membership Requirements Include: §679.110 1. Governor or Governor’s designee; 2. Two members of each chamber of the State legislature, appointed by the appropriate presiding officers of each such chamber; and 3. Members appointed by the Governor, of which: a. a majority shall be representatives of businesses in the State, who: (1) are owners of businesses, chief executives or operating officers of businesses, or other business executives or employers with optimum policymaking or hiring authority, and who, in addition, may be members of a local board described in section 107(b)(2)(A)(i); (2) represent businesses (including small businesses), or organizations representing businesses described in this sub-clause, that provide employment opportunities that, at a minimum, include high-quality, work-relevant training and development in in-demand industry sectors or occupations in the State; and (3) are appointed from among individuals nominated by State business organizations and business trade associations; b. not less than 20 percent shall be representatives of the workforce within the State, who: (1) shall include representatives of labor organizations, who have been nominated by State labor federations; (2) shall include a representative, who shall be a member of a labor organization or a training director, from a joint labor-management apprenticeship program, or if no such joint program exists in the State, such a representative of an apprenticeship program in the State; (3) may include representatives of community-based organizations that have demonstrated experience and expertise in addressing the employment, training, or education needs of individuals with barriers to employment, including organizations that serve veterans or that provide or support competitive, integrated employment for individuals with disabilities; and (4) may include representatives of organizations that have demonstrated experience and expertise in addressing the employment, training, or education needs of eligible youth, including representatives of organizations that serve out-of-school youth; and c. the balance: (1) shall include representatives of government, who: (a) shall include the lead State officials with primary responsibility for the core programs; and (b) shall include chief elected officials (collectively representing both cities and counties, where appropriate); and (2) may include such other representatives and officials as the Governor may designate, such as: (a) the State agency officials from agencies that are one-stop partners not specified in sub-clause (I) (including additional one-stop partners whose programs are covered by the State plan, if any); (b) State agency officials responsible for economic development or juvenile justice programs in the State; (c) individuals who represent an Indian tribe or tribal organization, as such terms are defined in section 166(b); and (d) State agency officials responsible for education programs in the State, including chief executive officers of community colleges and other institutions of higher education.

§ 679.120 What is meant by the terms “optimum policy-making authority” and “demonstrated experience and expertise”? For purposes of § 679.110: (a) A representative with “optimum policy-making authority” is an individual who can reasonably be expected to speak affirmatively on behalf of the entity he or she represents and to commit that entity to a chosen course of action. (b) A representative with “demonstrated experience and expertise” means an individual with documented
leadership in developing or implementing workforce development, human resources, training and
development, or a core program function. Demonstrated experience and expertise may include
individuals with experience in education or training of job seekers with barriers to employment as
described in § 679.110(b)(3)(ii)(C) and (D).

B. Responsibilities § 679.130 1. As the advisory board to the Governor on workforce development
the OWC Board’s responsibilities include: a. the development, implementation, and modification of
the 4 year State plan; b. the review of statewide policies, of statewide programs, and of
recommendations on actions that should be taken by the State to align workforce development
programs in the State in a manner that supports a comprehensive and streamlined workforce
development system in the State, including the review and provision of comments on the State
plans, if any, for programs and activities of one-stop partners that are not core programs; c. the
development and continuous improvement of the workforce development system in the State,
including— (1) the identification of barriers and means for removing barriers to better coordinate,
align, and avoid duplication among the programs and activities carried out through the system; (2)
the development of strategies to support the use of career pathways for the purpose of providing
individuals, including low-skilled adults, youth, and individuals with barriers to employment (including
individuals with disabilities), with workforce investment activities, education, and supportive services
to enter or retain employment; (3) the development of strategies for providing effective outreach to
and improved access for individuals and employers who could benefit from services provided
through the workforce development system; (4) the development and expansion of strategies for
meeting the needs of employers, workers, and jobseekers, particularly through industry or sector
partnerships related to in-demand industry sectors and occupations; (5) the identification of regions,
including planning regions, for the purposes of WIOA section 106(a), and the designation of local
areas under WIOA section 106, after consultation with local boards and chief elected officials; (6) the
development and continuous improvement of the one-stop delivery system in local areas, including
providing assistance to local boards, one-stop operators, one-stop partners, and providers with
planning and delivering services, including training services and supportive services, to support
effective delivery of services to workers, jobseekers, and employers; and (7) the development of
strategies to support staff training and awareness across programs supported under the workforce
development system; d. the development and updating of comprehensive State performance
accountability measures, including State adjusted levels of performance, to assess the effectiveness
of the core programs in the State as required under WIOA section 116(b); e. the identification and
dissemination of information on best practices, including best practices for— (1) the effective
operation of one-stop centers, relating to the use of business outreach, partnerships, and service
delivery strategies, including strategies for serving individuals with barriers to employment; (2)
the development of effective local boards, which may include information on factors that contribute to
enabling local boards to exceed negotiated local levels of performance, sustain fiscal integrity, and
achieve other measures of effectiveness; and (3) effective training programs that respond to real-
time labor market analysis, that effectively use direct assessment and prior learning assessment to
measure an individual’s prior knowledge, skills, competencies, and experiences, and that evaluate
such skills, and competencies for adaptability, to support efficient placement into employment or
career pathways; f. the development and review of statewide policies affecting the coordinated
provision of services through the State’s one-stop delivery system described in section 121(e),
including the development of— (1) objective criteria and procedures for use by local boards in
assessing the effectiveness and continuous improvement of one-stop centers described in such
section; (2) guidance for the allocation of one-stop center infrastructure funds under WIOA section
121(h); and (3) policies relating to the appropriate roles and contributions of entities carrying out
one-stop partner programs within the one-stop delivery system, including approaches to facilitating
equitable and efficient cost allocation in such system; g. the development of strategies for
technological improvements to facilitate access to, and improve the quality of, services and activities
provided through the one-stop delivery system, including such improvements to— (1) enhance
digital literacy skills (as defined in section 202 of the Museum and Library Services Act (20 U.S.C.
9101); referred to in this Act as “digital literacy skills”); (2) accelerate the acquisition of skills and
recognized postsecondary credentials by participants; (3) strengthen the professional development
of providers and workforce professionals; and (4) ensure such technology is accessible to individuals
with disabilities and individuals residing in remote areas; h. the development of strategies for aligning
technology and data systems across one-stop partner programs to enhance service delivery and
improve efficiencies in reporting on performance accountability measures (including the design and
implementation of common intake, data collection, case management information, and performance
accountability measurement and reporting processes and the incorporation of local input into such
design and implementation, to improve coordination of services across one-stop partner programs);
i. the development of allocation formulas for the distribution of funds for employment and training
activities for adults, and youth workforce investment activities, to local areas as permitted under
sections 128(b)(3) and 133(b)(3); j. the preparation of the annual reports described in paragraphs (1)
and (2) of section 116(d); k. the development of the statewide workforce and labor market
information system described in section 15(e) of the Wagner-Peyser Act (29 U.S.C. 49l–2(e)); and l.
the development of such other policies as may promote statewide objectives for, and enhance the
performance of, the workforce development system in the State. C. Conflict of Interest The CETC
has the responsibility to ensure all board members are aware of the WIOA Conflict of Interest Policy
in WIOA Law Section 101(f) that says a member may not vote on a matter under consideration by
the board: 1. Regarding the provision of services by such member (or by an entity that such member
represents); or 2. That would provide direct financial benefit to such member or the immediate family
of such member; or 3. Engage in any other activity determined by the Governor to constitute a
conflict of interest as specified in the State plan.

D. Memorandum of Understanding The CETC has the responsibility to: 1. Ensure the development
and execution of a Memorandum of Understanding between the Board and other Workforce
Innovations and Opportunities Act partners concerning delivery of required programs and activities in
order to meet the MOU requirements in Section 121(c) of the Workforce Innovations and
Opportunities Act. The provisions of the Memorandum of Understanding, at a minimum, must cover:
a. The services to be provided through the one-stop delivery system; b. How the costs of such
services and the operating costs of the system will be funded; c. Methods for referral of individuals
between the one-stop operator and the one-stop partners, for the appropriate services and activities;
d. methods to ensure the needs of workers and youth, and individuals with barriers to employment,
including individuals with disabilities, are addressed in the provision of necessary and appropriate
access to services, including access to technology and materials, made available through the one-
stop delivery system; e. The duration of the memorandum and the procedures for amending the
memorandum during the term of the memorandum; and f. Such other provisions, consistent with the
requirements of this title, as the parties to the agreement determine to be appropriate. 2. Provide,
upon request by the DOL WIOA Administration Unit and Office of Workforce Competitiveness,
copies of contracts and Memoranda of Understanding (as required by Section 121 (c) of WIOA) to
document partnerships, relationships, duties and cost sharing with one-stop center partners.

E. Integrated Workforce System The CETC has the responsibility to implement an integrated
workforce system in compliance with: 1. The State’s two-year strategic plan. 2. State policies and
procedures applicable to the Board’s activities.

F. Accessibility The CETC has the responsibility to ensure access to local workforce development
services available at times consistent to meet community needs.
G. Sunshine Provision The CETC has the responsibility to conduct all activities and meetings under this Agreement in compliance with the provisions of the Connecticut Open Meeting Laws and the Sunshine Provision requirement in the Workforce Innovations and Opportunities Act Section 101(g).

§ 679.140 How does the State Workforce Development Board meet its requirement to conduct business in an open manner under the “sunshine provision” of the Workforce Innovation and Opportunity Act? (a) The State WDB must conduct business in an open manner as required by WIOA sec. 101(g). (b) The State WDB must make available to the public, on a regular basis through electronic means and open meetings, information about the activities and functions of the State WDB, including: (1) The State Plan, or modification to the State Plan, prior to submission of the State Plan or modification of the State Plan; (2) Information regarding membership; (3) Minutes of formal meetings of the State WDB upon request; (4) State WDB by-laws as described at § 679.110(d).

H. Labor Market Information The CETC has the responsibility to utilize the State’s labor market information system to identify, by occupation, the labor demand by employers in each workforce development area.

I. The State Oversight’s Role and Responsibilities To ensure that the CETC members understand the State’s oversight role and responsibilities, staff from the Office or Workforce Competitiveness should participate in all new board member orientations to explain their roles and responsibilities as they relate to WIOA on behalf of the Governor.

J. State Regional Determination Policy

§ 679.230 What are the general procedural requirements for designation of local areas? As part of the process of designating or redesignating a local area, the Governor must develop a policy for designation of local areas that must include: (a) Consultation with the State WDB; (b) Consultation with the chief elected officials and affected Local WDBs; and (c) Consideration of comments received through a public comment process which must: (1) Offer adequate time for public comment prior to designation of the local area; and (2) Provide an opportunity for comment by representatives of Local WDBs, chief elected officials, businesses, institutions of higher education, labor organizations, other primary stakeholders, and the general public regarding the designation of the local area. 1000

LOCAL WORKFORCE INNOVATION BOARD COMPOSITION AND DUTIES

A. Local Board Composition § 679.320 1. For each local area in the State, the members of Local WDB must be selected by the chief elected official consistent with criteria established under WIOA sec. 107(b)(1) and criteria established by the Governor, and must meet the requirements of WIOA sec. 107(b)(2).

2. A majority of the members of the Local WDB must be representatives of business in the local area. At a minimum, two members must represent small business as defined by the U.S. Small Business Administration. Business representatives serving on Local WDBs also may serve on the State WDB. Each business representative must meet the following criteria: (a) Be an owner, chief executive officer, chief operating officer, or other individual with optimum policy-making or hiring authority; and (b) Provide employment opportunities in in-demand industry sectors or occupations, as those terms are defined in WIOA sec. 3(23).
3. At least 20 percent of the members of the Local WDB must be workforce representatives. These representatives: (a) Must include two or more representatives of labor organizations, where such organizations exist in the local area. Where labor organizations do not exist, representatives must be selected from other employee representatives;

4. Must include one or more representatives of a joint labor-management, or union affiliated, registered apprenticeship program within the area who must be a training director or a member of a labor organization. If no union affiliated registered apprenticeship programs exist in the area, a representative of a registered apprenticeship program with no union affiliation must be appointed, if one exists;

5. May include one or more representatives of community-based organizations that have demonstrated experience and expertise in addressing the employment, training or education needs of individuals with barriers to employment, including organizations that serve veterans or provide or support competitive integrated employment for individuals with disabilities; and

6. May include one or more representatives of organizations that have demonstrated experience and expertise in addressing the employment, training, or education needs of eligible youth, including representatives of organizations that serve out-of-school youth.

The Local WDB also must include:

1. At least one eligible training provider administering adult education and literacy activities under WIOA title II;

2. At least one representative from an institution of higher education providing workforce investment activities, including community colleges; and

3. At least one representative from each of the following governmental and economic and community development entities: a. Economic and community development entities; b. The State Employment Service office under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) serving the local area; and c. The programs carried out under title I of the Rehabilitation Act of 1973, other than sec. 112 or part C of that title; d. The membership of Local WDBs may include individuals or representatives of other appropriate entities in the local area, including:

   (1) Entities administering education and training activities who represent local educational agencies or community-based organizations with demonstrated expertise in addressing the education or training needs for individuals with barriers to employment; (2) Governmental and economic and community development entities who represent transportation, housing, and public assistance programs; (3) Philanthropic organizations serving the local area; and (4) Other appropriate individuals as determined by the chief elected official.

   e. Members must be individuals with optimum policy-making authority within the entities they represent. f. Chief elected officials must establish a formal nomination and appointment process, consistent with the criteria established by the Governor and State WDB under sec. 107(b)(1) of WIOA for appointment of members of the Local WDBs, that ensures:

   (1) Business representatives are appointed from among individuals who are nominated by local business organizations and business trade associations. (2) Labor representatives are appointed from among individuals who are nominated by local labor federations (or, for a local area in which no
employees are represented by such organizations, other representatives of employees); and (3) When there is more than one local area provider of adult education and literacy activities under title II, or multiple institutions of higher education providing workforce investment activities as described in WIOA sec. 107(b)(2)(C)(i) or (ii), nominations are solicited from those particular entities. g. An individual may be appointed as a representative of more than one entity if the individual meets all the criteria for representation, including the criteria described above for each entity. h. All required WDB members must have voting privilege. The chief elected official may convey voting privileges to non-required members.

§ 679.120 What is meant by the terms “optimum policy-making authority” and “demonstrated experience and expertise”? For purposes of § 679.110: (a) A representative with “optimum policy-making authority” is an individual who can reasonably be expected to speak affirmatively on behalf of the entity he or she represents and to commit that entity to a chosen course of action. (b) A representative with “demonstrated experience and expertise” means an individual with documented leadership in developing or implementing workforce development, human resources, training and development, or a core program function. Demonstrated experience and expertise may include individuals with experience in education or training of job seekers with barriers to employment as described in § 679.110(b)(3)(ii)(C) and (D).

§ 679.350 What criteria will be used to establish the membership of the Local Workforce Development Board? The Local WDB is appointed by the chief elected official(s) in the local area in accordance with State criteria established under WIOA sec. 107(b), and is certified by the Governor every 2 years, in accordance with WIOA sec. 107(c)(2). § 679.360 What is a standing committee, and what is its relationship to the Local Workforce Development Board?

(a) Standing committees may be established by the Local WDB to provide information and assist the Local WDB in carrying out its responsibilities under WIOA sec. 107. Standing committees must be chaired by a member of the Local WDB, may include other members of the Local WDB, and must include other individuals appointed by the Local WDB who are not members of the Local WDB and who have demonstrated experience and expertise in accordance with § 679.340(b) and as determined by the Local WDB. Standing committees may include each of the following: (1) A standing committee to provide information and assist with operational and other issues relating to the one-stop delivery system, which may include representatives of the one-stop partners. (2) A standing committee to provide information and to assist with planning, operational, and other issues relating to the provision of services to youth, which must include community-based organizations with a demonstrated record of success in serving eligible youth. (3) A standing committee to provide information and to assist with operational and other issues relating to the provision of services to individuals with disabilities, including issues relating to compliance with WIOA sec. 188, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding providing programmatic and physical access to the services, programs, and activities of the one-stop delivery system, as well as appropriate training for staff on providing supports for or accommodations to, and finding employment opportunities for, individuals with disabilities.

(b) The Local WDB may designate other standing committees in addition to those specified in paragraph (a) of this section. (c) Local WDBs may designate an entity in existence as of the date of the enactment of WIOA, such as an effective youth council, to serve as a standing committee as long as the entity meets the requirements of WIOA sec. 107(b)(4). § 681.100 What is a standing youth committee? The Workforce Innovation and Opportunity Act of 2014 (WIOA) eliminates the requirement for Local Workforce Development Boards (WDBs) to establish a youth council. However, the Department encourages Local WDBs to establish a standing committee to provide
information and to assist with planning, operational, oversight, and other issues relating to the provision of services to youth. If the Local WDB does not designate a standing youth committee, it retains responsibility for all aspects of youth formula programs. § 681.110 Who is included on a standing youth committee? (a) If a Local WDB decides to form a standing youth committee, the committee must include a member of the Local WDB, who chairs the committee, members of community-based organizations with a demonstrated record of success in serving eligible youth, and other individuals with appropriate expertise and experience who are not members of the Local WDB.

(b) The committee must reflect the needs of the local area. The committee members appointed for their experience and expertise may bring their expertise to help the committee address the employment, training, education, human and supportive service needs of eligible youth including out-of-school youth (OSY). Members may represent agencies such as secondary and postsecondary education, training, health, disability, mental health, housing, public assistance, and justice, or be representatives of philanthropic or economic and community development organizations, and employers. The committee may also include parents, participants, and youth.

(c) A Local WDB may designate an existing entity such as an effective youth council as the standing youth committee if it fulfills the requirements above in paragraph (a) of this section. § 681.120 What does a standing youth committee do?

Under the direction of the Local WDB, a standing youth committee may:

(a) Recommend policy direction to the Local WDB for the design, development, and implementation of programs that benefit all youth;

(b) Recommend the design of a comprehensive community workforce development system to ensure a full range of services and opportunities for all youth, including disconnected youth;

(c) Recommend ways to leverage resources and coordinate services among schools, public programs, and community-based organizations serving youth; (d) Recommend ways to coordinate youth services and recommend eligible youth service providers;

(e) Provide on-going leadership and support for continuous quality improvement for local youth programs;

(f) Assist with planning, operational, and other issues relating to the provision of services to youth; and

(g) If so delegated by the Local WDB after consultation with the chief elected official (CEO), oversee eligible youth providers, as well as other youth program oversight responsibilities.

B. Responsibilities

As provided in WIOA sec. 107(d), the Local WDB must:

(a) Develop and submit a 4-year local plan for the local area, in partnership with the chief elected official and consistent with WIOA sec. 108;
(b) If the local area is part of a planning region that includes other local areas, develop and submit a regional plan in collaboration with other local areas. If the local area is part of a planning region, the local plan must be submitted as a part of the regional plan;

(c) Conduct workforce research and regional labor market analysis to include:

(1) analyses and regular updates of economic conditions, needed knowledge and skills, workforce, and workforce development (including education and training) activities to include an analysis of the strengths and weaknesses (including the capacity to provide) of such services to address the identified education and skill needs of the workforce and the employment needs of employers; (2) Assistance to the Governor in developing the statewide workforce and labor market information system under the Wagner-Peyser Act for the region; (3) Other research, data collection, and analysis related to the workforce needs of the regional economy as the WDB, after receiving input from a wide array of stakeholders, determines to be necessary to carry out its functions.

(d) Convene local workforce development system stakeholders to assist in the development of the local plan under § 679.550 and in identifying non-Federal expertise and resources to leverage support for workforce development activities. Such stakeholders may assist the Local WDB and standing committees in carrying out convening, brokering, and leveraging functions at the direction of the Local WDB;

(e) Lead efforts to engage with a diverse range of employers and other entities in the region in order to:

(1) Promote business representation (particularly representatives with optimum policy- making or hiring authority from employers whose employment opportunities reflect existing and emerging employment opportunities in the region) on the Local WDB; (2) Develop effective linkages (including the use of intermediaries) with employers in the region to support employer utilization of the local workforce development system and to support local workforce investment activities; (3) Ensure that workforce investment activities meet the needs of employers and support economic growth in the region by enhancing communication, coordination, and collaboration among employers, economic development entities, and service providers; and (4) Develop and implement proven or promising strategies for meeting the employment and skill needs of workers and employers (such as the establishment of industry and sector partnerships), that provide the skilled workforce needed by employers in the region, and that expand employment and career advancement opportunities for workforce development system participants in in-demand industry sectors or occupations.

(f) With representatives of secondary and postsecondary education programs, lead efforts 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.

(g) Lead efforts in the local area to identify and promote proven and promising strategies and initiatives for meeting the needs of employers, workers and job seekers, and identify and disseminate information on proven and promising practices carried out in other local areas for meeting such needs. (h) Develop strategies for using technology to maximize the accessibility and effectiveness of the local workforce development system for employers, and workers and job seekers, by:
(1) Facilitating connections among the intake and case management information systems of the one-stop partner programs to support a comprehensive workforce development system in the local area; (2) Facilitating access to services provided through the one-stop delivery system involved, including access in remote areas; (3) Identifying strategies for better meeting the needs of individuals with barriers to employment, including strategies that augment traditional service delivery, and increase access to services and programs of the one-stop delivery system, such as improving digital literacy skills; and (4) Leveraging resources and capacity within the local workforce development system, including resources and capacity for services for individuals with barriers to employment.

(i) In partnership with the chief elected official for the local area: (1) Conduct oversight of youth workforce investment activities authorized under WIOA sec. 129(c), adult and dislocated worker employment and training activities under WIOA secs. 134(c) and (d); and entire one-stop delivery system in the local area; and (2) Ensure the appropriate use and management of the funds provided under WIOA subtitle B for the youth, adult, and dislocated worker activities and one-stop delivery system in the local area; and (3) Ensure the appropriate use management, and investment of funds to maximize performance outcomes under WIOA sec. 116. (j) Negotiate and reach agreement on local performance indicators with the chief elected official and the Governor.

(k) Negotiate with CEO and required partners on the methods for funding the infrastructure costs of one-stop centers in the local area in accordance with § 678.715 of this chapter or must notify the Governor if they fail to reach agreement at the local level and will use a State infrastructure funding mechanism.

(l) Select the following providers in the local area, and where appropriate terminate such providers in accordance with 2 CFR part 200:

(1) Providers of youth workforce investment activities through competitive grants or contracts based on the recommendations of the youth standing committee (if such a committee is established); however, if the Local WDB determines there is an insufficient number of eligible training providers in a local area, the Local WDB may award contracts on a sole-source basis as per the provisions at WIOA sec. 123(b); (2) Providers of training services consistent with the criteria and information requirements established by the Governor and WIOA sec. 122; (3) Providers of career services through the award of contracts, if the one-stop operator does not provide such services; and (4) One-stop operators in accordance with §§ 678.600 through 678.635 of this chapter. (m) In accordance with WIOA sec. 107(d)(10)(E) work with the State to ensure there are sufficient numbers and types of providers of career services and training services serving the local area and providing the services in a manner that maximizes consumer choice, as well as providing opportunities that lead to competitive integrated employment for individuals with disabilities.

(n) Coordinate activities with education and training providers in the local area, including:

(1) Reviewing applications to provide adult education and literacy activities under title II for the local area to determine whether such applications are consistent with the local plan; (2) Making recommendations to the eligible agency to promote alignment with such plan; and (3) Replicating and implementing cooperative agreements to enhance the provision of services to individuals with disabilities and other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers, and other efforts at cooperation, collaboration, and coordination.
(o) Develop a budget for the activities of the Local WDB, with approval of the chief elected official and consistent with the local plan and the duties of the Local WDB. (p) Assess, on an annual basis, the physical and programmatic accessibility of all one-stop centers in the local area, in accordance with WIOA sec. 188, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.).

(q) Certification of one-stop centers in accordance with § 678.800 of this chapter.

B. Consumer Choice § 679.380 (a) In accordance with WIOA sec. 122 and in working with the State, the Local WDB satisfies the consumer choice requirement for training services by: (1) Determining the initial eligibility of entities providing a program of training services, renewing the eligibility of providers, and considering the possible termination of an eligible training provider due to the provider’s submission of inaccurate eligibility and performance information or the provider’s substantial violation of WIOA;

(2) Working with the State to ensure there are sufficient numbers and types of providers of training services, including eligible training providers with expertise in assisting individuals with disabilities and eligible training providers with expertise in assisting adults in need of adult education and literacy activities described under WIOA sec. 107(d)(10)(E), serving the local area;

(3) Ensuring the dissemination and appropriate use of the State list through the local one-stop delivery system. (4) Receiving performance and cost information from the State and disseminating this information through the one-stop delivery systems within the State; and

(5) Providing adequate access to services for individuals with disabilities.

(b) Working with the State, the Local WDB satisfies the consumer choice requirement for career services by:

(1) Determining the career services that are best performed by the one-stop operator consistent with §§ 678.620 and 678.625 of this chapter and career services that require contracting with a career service provider; (2) Identifying a wide-array of potential career service providers and awarding contracts where appropriate including to providers to ensure:

(i) Sufficient access to services for individuals with disabilities, including opportunities that lead to integrated, competitive employment for individuals with disabilities; (ii) Sufficient access for adult education and literacy activities.

C. Sunshine Provision § 679.390 The Local WDB must conduct its business in an open manner as required by WIOA sec. 107(e), by making available to the public, on a regular basis through electronic means and open meetings, information about the activities of the Local WDB. This includes:

(a) Information about the Local Plan, or modification to the Local Plan, before submission of the plan;

(b) List and affiliation of Local WDB members; (c) Selection of one-stop operators;
(d) Award of grants or contracts to eligible training providers of workforce investment activities including providers of youth workforce investment activities;

(e) Minutes of formal meetings of the Local WDB; and

(f) Local WDB by-laws, consistent with § 679.310(g).

D. Staffing § 679.400

(a) WIOA sec. 107(f) grants Local WDBs authority to hire a director and other staff to assist in carrying out the functions of the Local WDB.

(b) Local WDBs must establish and apply a set of qualifications for the position of director that ensures the individual selected has the requisite knowledge, skills, and abilities to meet identified benchmarks and to assist in carrying out the functions of the Local WDB. (c) The Local WDB director and staff must be subject to the limitations on the payment of salary and bonuses described in WIOA sec. 194(15). (d) In general, Local WDB staff only may assist the Local WDB fulfill the required functions at WIOA sec. 107(d).

§ 679.410 Under what conditions may a Local Workforce Development Board directly be a provider of career services, or training services, or act as a one-stop operator? (a)(1) A Local WDB may be selected as a one-stop operator: (i) Through sole source procurement in accordance with § 678.610 of this chapter; or (ii) Through successful competition in accordance with § 678.615 of this chapter. (2) The chief elected official in the local area and the Governor must agree to the selection described in paragraph (a)(1) of this section. (3) Where a Local WDB acts as a one-stop operator, the State must ensure certification of one-stop centers in accordance with § 678.800 of this chapter. (b) A Local WDB may act as a provider of career services only with the agreement of the chief elected official in the local area and the Governor. (c) A Local WDB is prohibited from providing training services, unless the Governor grants a waiver in accordance with the provisions in WIOA sec. 107(g)(1). (1) The State must develop a procedure for approving waivers that includes the criteria at WIOA sec. 107(g)(1)(B)(i): (i) Satisfactory evidence that there is an insufficient number of eligible training providers of such a program of training services to meet local demand in the local area; (ii) Information demonstrating that the WDB meets the requirements for eligible training provider services under WIOA sec. 122; and (iii) Information demonstrating that the program of training services prepares participants for an in-demand industry sector or occupation in the local area. (2) The local area must make the proposed request for a waiver available to eligible training providers and other interested members of the public for a public comment period of not less than 30 days and includes any comments received during this time in the final request for the waiver. (3) The waiver must not exceed the duration of the local plan and may be renewed by submitting a new waiver request consistent with paragraphs (c)(1) and (2) of this section for additional periods, not to exceed the durations of such subsequent plans. (4) The Governor may revoke the waiver if the Governor determines the waiver is no longer needed or that the Local WDB involved has engaged in a pattern of inappropriate referrals to training services operated by the Local WDB. (d) The restrictions on the provision of career and training services by the Local WDB, as one-stop operator, also apply to staff of the Local WDB.

§ 679.420 What are the functions of the local fiscal agent? (a) In order to assist in administration of the grant funds, the chief elected official or t Governor, where the Governor serves as the local grant recipient for a local area, may designa an entity to serve as a local fiscal agent. Designation of a fiscal agent does not relieve the chie elected official or Governor of liability for the misuse of grant
funds. If the CEO designates a fiscal agent, the CEO must ensure this agent has clearly defined roles and responsibilities. (b) In general the fiscal agent is responsible for the following functions: (1) Receive funds 2) Ensure sustained fiscal integrity and accountability for expenditures of funds in accordance with Office of Management and Budget circulars, WIOA and the corresponding Federal Regulations and State policies (3) Respond to audit financial findings (4) Maintain proper accounting records and adequate documentation (5) Prepare financial reports (6) Provide technical assistance to subrecipients regarding fiscal issues (c) At the direction of the Local WDB or the State WDB in single-area States, the fiscal agent may have the following additional functions: (1) Procure contracts or obtain written agreements (2) Conduct financial monitoring of service providers (3) Ensure independent audit of all employment and training programs

§ 679.430 How do entities performing multiple functions in a local area demonstrate internal controls and prevent conflict of interest? Local organizations often function simultaneously in a variety of roles, including local fiscal agent, Local WDB staff, one-stop operator, and direct provider of services. Any organization that has been selected or otherwise designated to perform more than one of these functions must develop a written agreement with the Local WDB and CEO to clarify how the organization will carry out its responsibilities while demonstrating compliance with WIOA and corresponding regulations, relevant Office of Management and Budget circulars, and the State’s conflict of interest policy.

D. Regional and Local Plan § 679.500

The local plan serves as 4-year action plan to develop, align, and integrate service delivery strategies and to support the State’s vision and strategic and operational goals. The local plan sets forth the strategy to: • Direct investments in economic, education, and workforce training programs to focus on providing relevant education and training to ensure that individuals, including youth and individuals with barriers to employment, have the skills to compete in the job market and that employers have a ready supply of skilled workers; • Apply job-driven strategies in the one-stop delivery system;

• Enable economic, education, and workforce partners to build a skilled workforce through innovation in, and alignment of, employment, training, and education programs; and

• Incorporate the local plan into the regional plan per § 679.540. In the case of planning regions, a regional plan is required to meet the purposes described in paragraph (a) of this section and to coordinate resources among multiple WDBs in a region.

The Governor must establish and disseminate to Local WDBs and regional planning areas a policy for the submission of local and regional plans. The policy must set a deadline for the submission of the regional and local plans that accounts for the activities required in plan development outlined in §§ 679.510 and 679.550.

§ 679.550 What are the requirements for the development of the local plan?

(a) Under WIOA sec. 108, each Local WDB must, in partnership with the appropriate chief elected officials, develop and submit a comprehensive 4-year plan to the Governor.

(1) The plan must identify and describe the policies, procedures, and local activities that are carried out in the local area, consistent with the State Plan. (2) If the local area is part of a planning region,
the Local WDB must comply with WIOA sec. 106(c) and §§ 679.510 through 679.540 in the preparation and submission of a regional plan (b) Consistent with § 679.510(b), the Local WDB must provide an opportunity for public comment on the development of the local plan or subsequent plan modifications before submitting the plan to the Governor. To provide adequate opportunity for public comment, the Local WDB must:

(1) Make copies of the proposed local plan available to the public through electronic and other means, such as public hearings and local news media; (2) Include an opportunity for comment by members of the public, including representatives of business, labor organizations, and education; (3) Provide no more than a 30-day period for comment on the plan before its submission to the Governor, beginning on the date on which the proposed plan is made available, prior to its submission to the Governor; and (4) The Local WDB must submit any comments that express disagreement with the plan to the Governor along with the plan. (5) Consistent WIOA sec. 107(e), the Local WDB must make information about the plan available to the public on a regular basis through electronic means and open meetings.

§ 679.560 What are the contents of the local plan? (a) The local workforce investment plan must describe strategic planning elements, including: (1) A regional analysis of: (i) Economic conditions including existing and emerging in-demand industry sectors and occupations; and (ii) Employment needs of employers in existing and emerging in-demand industry sectors and occupations. (iii) As appropriate, a local area may use an existing analysis, which is a timely current description of the regional economy, to meet the requirements of paragraphs (a)(1)(i) and (ii) of this section.

(2) Knowledge and skills needed to meet the employment needs of the employers in the region, including employment needs in in-demand industry sectors and occupations;

(3) An analysis of the regional workforce, including current labor force employment and unemployment data, information on labor market trends, and educational and skill levels of the workforce, including individuals with barriers to employment;

(4) An analysis of workforce development activities, including education and training, in the region. This analysis must include the strengths and weaknesses of workforce development activities and capacity to provide the workforce development activities to address the education and skill needs of the workforce, including individuals with barriers to employment, and the employment needs of employers;

(5) A description of the Local WDB’s strategic vision to support regional economic growth and economic self-sufficiency. This must include goals for preparing an educated and skilled workforce (including youth and individuals with barriers to employment), and goals relating to the performance accountability measures based on performance indicators described in § 677.155(a)(1) of this chapter; and

(6) Taking into account analyses described in paragraphs (a)(1) through (4) of this section, a strategy to work with the entities that carry out the core programs and required partners to align resources available to the local area, to achieve the strategic vision and goals described in paragraph (a)(5) of this section;

(b) The plan must include a description of the following requirements at WIOA secs. 108(b)(2)-(21):
(1) The workforce development system in the local area that identifies: (i) The programs that are included in the system; and (ii) How the Local WDB will support the strategy identified in the State Plan under § 676.105 of this chapter and work with the entities carrying out core programs and other workforce development programs, including programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.) to support service alignment.

(2) How the Local WDB will work with entities carrying out core programs to: (i) Expand access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment; (ii) Facilitate the development of career pathways and co-enrollment, as appropriate, in core programs; and (iii) Improve access to activities leading to a recognized postsecondary credential (including a credential that is an industry-recognized certificate or certification, portable, and tackable);

(3) The strategies and services that will be used in the local area:

(i) To facilitate engagement of employers in workforce development programs, including small employers and employers in in-demand industry sectors and occupations; (ii) To support a local workforce development system that meets the needs of businesses in the local area; (iii) To better coordinate workforce development programs and economic development; (iv) To strengthen linkages between the one-stop delivery system and unemployment insurance programs; and (v) To improve access to activities leading to a recognized postsecondary credential (including a credential that is an industry-recognized certificate or certification, portable, and tackable).

(4) An examination of how the Local WDB will coordinate local workforce investment activities with regional economic development activities that are carried out in the local area and how the Local WDB will promote entrepreneurial skills training and microenterprise services;

(5) The one-stop delivery system in the local area, including: through the system and that such providers will meet the employment needs of local employers, workers, and job seekers;

(ii) How the Local WDB will facilitate access to services provided through the one-stop delivery system, including in remote areas, through the use of technology and other means; (iii) How entities within the one-stop delivery system, including one-stop operators and the one-stop partners, will comply with WIOA sec. 188, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing the needs of individuals with disabilities; and (iv) The roles and resource contributions of the one-stop partners;

(6) A description and assessment of the type and availability of adult and dislocated worker employment and training activities in the local area;

(7) A description of how the Local WDB will coordinate workforce investment activities carried out in the local area with statewide rapid response activities;
(8) A description and assessment of the type and availability of youth workforce investment activities in the local area including activities for youth who are individuals with disabilities, which must include an identification of successful models of such activities;

(9) How the Local WDB will coordinate relevant secondary and postsecondary education programs and activities with education and workforce investment activities to coordinate strategies, enhance services, and avoid duplication of services;

(10) How the Local WDB will coordinate WIOA title I workforce investment activities with the provision of transportation and other appropriate supportive services in the local area;

(11) Plans, assurances, and strategies for maximizing coordination, improving service delivery, and avoiding duplication of Wagner-Peyser Act (29 U.S.C. 49 et seq.) services and other services provided through the one-stop delivery system;

(12) How the Local WDB will coordinate WIOA title I workforce investment activities with adult education and literacy activities under WIOA title II. This description must include how the Local WDB 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; (13) Copies of executed cooperative agreements which define how all local service providers, including additional providers, will carry out the requirements for integration of and access to the entire set of services available in the local one-stop delivery system. This includes cooperative agreements (as defined in WIOA sec. 107(d)(11)) between the Local WDB or other local entities described in WIOA sec. 101(a)(11)(B) of the Rehabilitation Act of 1973 (29 U.S.C. 721(a)(11)(B)) and the local office of a designated State agency or designated State unit administering programs carried out under title I of the Rehabilitation Act(29 U.S.C. 720 et seq.) other than sec. 112 or part C of that title (29 U.S.C. 732, 741) and subject to sec. 121(f)) in accordance with sec. 101(a)(11) of the Rehabilitation Act (29 U.S.C. 721(a)(11)) with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers, and other efforts at cooperation, collaboration, and coordination;

(14) An identification of the entity responsible for the disbursal of grant funds described in WIOA sec. 107(d)(12)(B)(i)(III), as determined by the chief elected official or the Governor under WIOA sec. 107(d)(12)(B)(i).

(15) The competitive process that will be used to award the subgrants and contracts for WIOA title I activities;

(16) The local levels of performance negotiated with the Governor and chief elected official consistent with WIOA sec. 116(c), to be used to measure the performance of the local area and to be used by the Local WDB for measuring the performance of the local fiscal agent (where appropriate), eligible providers under WIOA title I subtitle B, and the one-stop delivery system in the local area;

(17) The actions the Local WDB will take toward becoming or remaining a high-performing WDB, consistent with the factors developed by the State WDB;

(18) How training services outlined in WIOA sec. 134 will be provided through the use of individual training accounts, including, if contracts for training services will be used, how the use of such contracts will be coordinated with the use of individual training accounts under that chapter, and how
the Local WDB will ensure informed customer choice in the selection of training programs regardless of how the training services are to be provided;

(19) The process used by the Local WDB, consistent with WIOA sec. 108(d), to provide a 30-day public comment period prior to submission of the plan, including an opportunity to have input into the development of the local plan, particularly for representatives of businesses, education, and labor organizations;

(20) How one-stop centers are implementing and transitioning to an integrated, technology-enabled intake and case management information system for programs carried out under WIOA and by one-stop partners; and

(21) The direction given by the Governor and the Local WDB to the one-stop operator to ensure priority for adult career and training services will be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient consistent with WIOA sec. 134(c)(3)(E) and § 680.600 of this chapter. (c) The local plan must include any additional information required by the Governor (d) The local plan must identify the portions that the Governor has designated as appropriate for common response in the regional plan where there is a shared regional responsibility, as permitted by § 679.540(b). (e) Comments submitted during the public comment period that represent disagree with the plan must be submitted with the local plan.

§ 679.570 What are the requirements for approval of a local plan?

(a) Consistent with the requirements at § 679.520 the Governor must review completed plans (including a modification to the plan). Such plans will be considered approved 90 days after the Governor receives the plan unless the Governor determines in writing that:

(1) There are deficiencies in workforce investment activities that have been identified through audits and the local area has not made acceptable progress in implementing plans to address deficiencies; or

(2) The plan does not comply with applicable provisions of WIOA and the WIOA regulations, including the required consultations and public comment provisions, and the nondiscrimination requirements of 29 CFR part 38.

(3) The plan does not align with the State Plan, including with regard to the alignment the core programs to support the strategy identified in the State Plan in accordance with WIOA sec. 102(b)(1)(E) and § 676.105 of this chapter.

§ 679.580 When must the local plan be modified? (a) Consistent with the requirements at § 679.530, the Governor must establish procedures governing the modification of local plans. (b) At the end of the first 2-year period of the 4-year local plan, each Local WDB, in partnership with the appropriate chief elected officials, must review the local plan and prepare and submit modifications to the local plan to reflect changes: to: (1) In labor market and economic conditions; and (2) Other factors affecting the implementation of the local plan, including but not limited

(i) Significant changes in local economic conditions, (ii) Changes in the financing available to support WIOA title I and partner-provided WIOA services; (iii) Changes to the Local WDB structure; and (iv) The need to revise strategies to meet local performance goals. ADMINISTRATIVE STANDARDS
All recipients and sub-recipients including contractors, and service providers receiving Workforce Innovation and Opportunity Act funds must operate under WIOA law and regulations that prohibit certain activities. Activities in any of these prohibited areas will be cause for disciplinary measures and the possible de-obligation of funds.

A. Conflict of Interest 1. Each recipient, sub-recipient, or participant shall avoid organizational conflict of interest, and their personnel shall avoid personal conflict of interest and appearance of conflict of interest in awarding financial assistance, and in the conduct of procurement activities involving funds under the Act. 2. Neither the recipient nor sub-recipient or participant shall pay funds under the Act to any nongovernmental individual, institution or organization to conduct an evaluation of any program under the Act if such individual, institution or organization is associated with that program as a consultant or technical advisor. 3. Each recipient and sub-recipient shall maintain a written code of standards of conduct governing the performance of persons engaged in the award and administration of WIOA contracts and provider agreements. 4. Each recipient sub-recipient or participant shall ensure that no individual in a decision making capacity including State CETC members (whether compensated or not) shall engage in any activity, including participation in the selection, award, or administration of a provider agreement or contract supported by WIOA funds if a conflict of interest, real or apparent, would be involved. Such conflict would arise when the individual; any member of the individual’s immediate family; the individual’s partner; or an organization that employs, or is about to employ, any of the above has a financial or other interest in the firm or organization selected for award. 5. The officers, employees, or agents of the agency making the award will neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to provider agreements. 6. To the extent permitted by State or local law or regulation, such standards of conduct will provide for penalties, sanctions, or other disciplinary actions for violations of such standards by the awarding agency’s officers, employees, or agents, or by contractors or their agents. 7. In accordance with the requirements at 2 CFR 200.112, recipients of Federal awards must disclose in writing any potential conflict of interest to the Department. s must disclose in writing any potential conflict of interest to the recipient of grant funds. WIOA Regs. 20 CFR Part 683.200

B. Lobbying Activities 1. All WIOA Title I recipients, sub-recipients or participants must comply with the restrictions on lobbying as specified in WIOA Law Sec. 195 and codified in USDOL’s regulations at 29 CFR Part 93. 2. No funds provided under the Act may be used in any way to attempt to influence in any manner: a. a member of Congress, an officer or employee of Congress, or an employee of a member of Congress to favor or oppose any legislation or appropriation by Congress; or b. state or local legislators to favor or oppose any legislation or appropriation by such legislators. Communications and consultation with state and local legislators for purposes of providing information such as on matters necessary to provide compliance with the Act shall not be considered lobbying. 3. 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 that may be connected to Federal contracts, grants, loan or cooperative agreement relating to the Act, a Standard Form – LLL, “Disclosure Form to Report Lobbying” shall be completed and submitted in accordance with its instructions.

Certification regarding lobbying language must be included in all award documents for all sub-awards at all tiers (including subcontracts, provider agreements, and contracts under grants, loans, and cooperative agreements) and that all s shall certify and disclose accordingly.
Submission of certification regarding lobbying is a pre-requisite for making or entering into this transaction imposed by Section 1352, Title 31, and U.S.C. 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. 29 CFR Part 93 C. Political Activities or Patronage 1. Political Activities a. No recipient, sub-recipient or participant may engage in partisan or nonpartisan political activities during hours for which the individual is paid with WIOA funds. b. No recipient, sub-recipient or participant may, at any time engage in partisan or nonpartisan political activities in which such individual represents himself/herself as a spokesperson of the WIOA program. c. No participant may be employed or out-stationed in the office of a member, a State or local legislator or on any staff of a legislative committee. d. No participant may be employed or out-stationed in the immediate office of any chief-elected executive official (or officials, if the office of chief executive is shared by more than one person) of a State or unit of general local government, except that: (1) Units of local government in rural areas may employ participants in such positions provided that documentation is presented to and approved by the State Administrative Entity prior to employment, which makes clear that such positions are nonpolitical; and (2) Where positions are technically in such office, but are actually program activities not in any way involved in political functions, documentation attesting to the nonpolitical nature of the positions is to be provided to the State Administrative Entity for approval prior to enrollment of participants in such positions. e. No participant may be employed or out-stationed in positions involving political activities in the offices of other elected executive officials. However, since under the responsibility of such elected officials are non-political activities, placement of participants in such nonpolitical positions is permissible. f. Persons governed by Chapter 15 of Title 5, United States Code, the Hatch Act, shall comply with its provisions as interpreted by the United States Office of Personnel Management. These provisions apply: (1) To persons (including participants) employed by state and local government in the administration of the WIOA program; and (2) Generally to any participant whose principal employment is in connection with an activity financed by other federal grants or loans. 2. Political Patronage a. No recipient or sub-recipient may select, retain, or promote staff or participants based on that individual's political affiliation or beliefs. The selection or advancement of employees as a reward for political services or as a form of political patronage whether or not the political service or patronage is partisan in nature, is prohibited. b. There shall be no selection of service providers or contractors based on political patronage or affiliation. WIOA Sec. 194(6) D. Kickbacks/Fees No officer, employee or agent of any recipient or sub-recipient shall solicit or accept gratuities, favors or anything of monetary value from any actual or potential sub-recipient or contractor. 41 U.S.C. 53 E. Charging of Fees Nothing in this section shall be interpreted as prohibiting the recipient or sub-recipient from entering into an agreement for the purpose of obtaining outreach, recruitment and/or intake services, and placement of participants into unsubsidized jobs as part of its approved plan, provided the individuals served are not charged a fee. WIOA Sec. 194(5) F. Nepotism Nepotism is an unfair practice that occurs when hiring or delivery of program services is based on personal connections, rather than ability or merit. An example of nepotism is when people in power give positions in a government or organization to their relatives or friends, rather than to any individual who is well qualified.

All recipients and sub-recipients (e.g., service providers, contractors) shall comply with applicable federal, state, and local nepotism laws.
No individual may be placed in a WIOA employment activity or receive WIOA services directly if that person’s immediate family is directly supervised by or directly supervises that individual. WIOA Regs. 20 CFR 683.200

For Connecticut’s WIOA programs personal relationship means domestic partners and immediate family means: wife, husband, children, daughter-in-law, son-in-law, parents, grandchildren, mother-in-law, father-in-law, brother-in-law, sister-in-law, grandparents, step-grandparents, spouse’s grandparents, spouse’s step-grandparents, step-children, step-parents, brothers and sisters, and step-brothers and step-sisters of the customer. When relationships such as those listed above or others that may be perceived as a relationship exist service providers must use prudent judgment and refer the individual to other staff or another service provider as appropriate.

The State of Connecticut defines nepotism as the bestowal of political patronage by reason of relationship rather than of merit. MCA 2-2-301 through 2-2-304

G. Child Labor Laws All recipients and sub-recipients shall comply with applicable federal, state, and local child labor laws. MCA 41-2-105 thru 110; 29 CFR Part 571

H. Sectarian Activities 1. WIOA funds may be used to train participants in religious activities when the assistance is provided indirectly through an Individual Training Account. 2. WIOA funds may not be used for employment in the construction, operation, or maintenance of any part of any facility that is used or will be used for sectarian instruction or as a place for religious worship with the exception of maintenance of facilities that are not primarily used for instruction or for worship and are operated by organizations providing services to WIOA participants. WIOA Sec. 188(a)(3); 20 CFR Part 683.255; 29 CFR Part 2, subpart D, and 29 CFR Part 37.6(f)(1) (Reference TEGL 1-05 dated July 6, 2005)

I. Criminal Activities Criminal activities, including theft or embezzlement of employment and training funds; bribery; improper inducement; and obstruction of investigations in federally funded employment and training programs are prohibited under criminal provisions at 18 U.S.C. 665 and 666. The process for reporting criminal activities is described in WIOA Regulations 20 CFR Part 683.620.

J. Funding and Program Restrictions WIOA Title 1 funds must not be spent on: a. The wages of incumbent employees during their participation in economic development activities provided through a statewide workforce development system. b. Public service employment, except as specifically authorized under Title I of WIOA. c. Expenses prohibited under any other Federal, State or local law or regulation. d. Any activity under this title that is used for employment generating activities, investment in revolving loan funds, capitalization of businesses, investment in contract bidding resource centers, economic development activities, or similar activities, that are not directly related to training for eligible individuals under this title. WIOA Law Sec. 181 2. Programs will not impair existing contracts for services or result in the substitution of federal funds for other funds in connection with work that would otherwise be performed, including services normally provided by temporary, part-time or seasonal workers or through contracting such services out. 3. WIOA Title I funds shall not be used for foreign travel. WIOA Law Sections 181 and 194 WIOA Regulations 20 CFR Part 683.250

K. Labor Standards 1. No participant shall be hired into or remain working in any position when the same or substantially equivalent position is vacant due to a hiring freeze, unless the recipient can demonstrate that the freeze resulted from a lack of funds to sustain staff and was not established in
anticipation of the availability of funds under the Act. 2. Programs will not impair existing: a. Contracts for services; or b. Collective bargaining agreements unless the employer and labor organization concur in writing with respect to the elements of proposed activities within 30 days of receipt. 3. When termination of participants is due to a hiring freeze the service provider shall make an attempt to place such participants into other non-affected positions or attempt placement into unsubsidized jobs or into another program or activity. 4. Whenever a promotional freeze affects non-WIOA funded employees it shall apply to WIOA participants similarly employed. 5. No former employees laid off or terminated in anticipation of WIOA funding of a position may be rehired under WIOA into such a position. 6. Participants in on-the-job training or individuals employed in activities under Title I of WIOA must be compensated at the same rates, including periodic increases, as trainees or employees who are similarly situated in similar occupations by the same employer and who have similar training experience and skills. 7. No participant shall be hired into a position resulting in the displacement of a currently employed worker (including partial displacement such as reduction in hours of non-overtime work, wages or employment benefits). 8. No participant shall receive a promotion that would infringe in any way upon the promotional opportunities of currently employed workers. WIOA Sec. 181 WIOA Regs 20 CFR Part 683.275

L. Unionization/Anti-unionization Activities and Work Stoppages 1. No individual shall be required to join a union as a condition for enrollment in a program in which only institutional training is provided, unless such institutional training involves individuals employed under a collective bargaining agreement, which contains a union security provision. 2. No participant in work experience or vocational exploration may be placed into, or remain working in, any position which is affected by labor disputes involving a work stoppage. If such a work stoppage occurs during the grant period, participants in affected positions must: a. Be relocated to positions not affected by the dispute; b. Be suspended through administrative leave; or c. Where participants belong to the labor union involved in work stoppage, be treated in the same manner as any other union member except such members must not remain working in the affected position. The service provider shall make every effort to relocate participants who wish to remain working into suitable positions unaffected by the work stoppage. 3. No person shall be referred to or placed in an on-the-job training position affected by a labor dispute involving a work stoppage and no payments may be made to employers for the training and employment of participants in on-the-job training during the periods of work stoppage. 4. No funds provided to employers for work-based training may be used to assist, promote or deter union organizing. WIOA Law Sec. 181(b) WIOA Regs. 20 CFR Parts 680.850; 683.275 M. Business Relocation 1. Funds provided under the Act shall not be used to encourage or induce relocation of an establishment or any part that results in loss of employment for any employee at the original site. 2. Funds provided under the Act shall not be used for customized or skill training, on-the-job training, or company-specific assessments of job applicants or employees for any business or any part of any business, that has relocated, until 120 days after the date on which the establishment commences operations at the new location, if the relocation results in a loss of employment for any employee at the original site and the original site is within the United States. WIOA Sec. 181 WIOA Regs. 20 CFR Part 683.260

N. Employment Generating/Economic Development Funds provided under the Act shall not be used for employment generating activities, economic development activities, investment in revolving loan funds, capitalization of businesses, investment in contract bidding resource centers, and similar activities that are not directly related to training for eligible individuals under this title. WIOA Sec. 181

O. Nondiscrimination and Equal Opportunity 1. All eligible service and training providers receiving WIOA Title IB funds must comply fully with the nondiscrimination and equal opportunity provisions of WIOA Section 188 and Equal Opportunity and Nondiscrimination Regulations at 29 CFR Part 37. 2.
All programs shall establish procedures to ensure against discrimination, sexual harassment in any form, and foster equal opportunity and shall issue a statement of assurance to be signed by the chief operating official. 3. Service providers are not required to designate Equal Opportunity Officers. Service providers should however designate an individual who will serve as liaison with the State Equal Opportunity Officer. 4. Provider agreements will contain assurance language that it will comply with Equal Opportunity requirements of Section 188 of the Act, 29 CFR Part 37, and 1604, the Civil Rights Act of 1964 and all other applicable equal opportunity laws and regulations. The assurance may be incorporated by reference. 5. Discriminatory discharge prohibited. No person, organization or agency may discharge, or in any other manner discriminate or retaliate against any person, or deny to any person a benefit to which that person is entitled under the provisions of the Act because such person has filed any complaint, instituted or caused to be instituted any proceeding under or related to the Act, has testified or is about to testify in any such proceeding or investigation, or has provided information or assisted in an investigation. WIOA Sec. 181, 188; 29 CFR Part 37; MCA 9-2-303(b)

6. Sexual Harassment/Sex-Based Harassment. Harassment on the basis of sex is a violation of Section 703 of Title VII of the Civil Rights Act of 1964. Assurances regarding nondiscrimination and equal opportunity apply to sexual harassment as well. 29 CFR 1604(11); 29 CFR Part 34

P. Equal Treatment in Department of Labor Programs for Religious Organizations; Protection of Religious Liberty of Department of Labor Social Service Providers and Beneficiaries. 1. All eligible service and training providers receiving WIOA Title 1B funds must comply fully with the provisions of 29 CFR part 2, subpart D (29 CFR 2.30), and ensure that DOL-supported social service programs are open to all qualified organizations, regardless of the organizations’ religious character, and to clearly establish the permissible uses to which DOL support for social service programs may be put, and the conditions for receipt of such support.

2. In addition, providers must ensure that the Department’s social service programs are implemented in a manner consistent with the requirements of the Constitution, including the Religion Clauses of the First Amendment. 29 CFR Part 2.30

Q. Testing and Sanctioning for Use of Controlled Substances Notwithstanding any other provision of law, the Federal Government shall not prohibit a State from: 1. Testing participants in programs under Title IB for the use of controlled substances; and 2. Sanctioning such participants who test positive for the use of such controlled substances. a. Period Of Sanction: In sanctioning participants in a program under subtitle B who test positive for the use of controlled substances: (1) with respect to the first occurrence for which a participant tests positive, a State may exclude the participant from the program for a period not to exceed 6 months; and (2) with respect to the second occurrence and each subsequent occurrence for which a participant tests positive, a State may exclude the participant from the program for a period not to exceed 2 years. b. Appeal: The testing of participants and the imposition of sanctions under this subsection shall be subject to expeditious appeal in accordance with due process procedures established by the State. WIOA Law Sec. 181

COMPLAINTS AND GRIEVANCES § 683.600

This section is designed to provide the grievance and complaint procedure as required in the Workforce Innovation and Opportunity Act. WIOA Sec. 181(c)

Whenever any person, organization or agency believes that a Governor, WIOA grant recipient or other (e.g., service providers, contractors) has engaged in conduct that violates the Act and that
such conduct also violates a Federal statute other than WIOA, or a State or local law, that person, organization or agency may, with respect to the non-WIOA cause of action, institute a civil action or pursue other remedies authorized under other Federal, State or local law against the Governor, WIOA grant recipient or other without first exhausting the remedies in this section. Nothing in the Act or WIOA regulations: 1. Allows any person or organization to join or sue the Secretary with respect to the Secretary's responsibilities under WIOA except after exhausting the remedies in this section; 2. Allows any person or organization to file a suit which alleges a violation of WIOA or these regulations without first exhausting the administrative remedies described in this section; or 3. May be construed to create a private right of action with respect to alleged violations of WIOA or the regulations.

I. Grievance and Complaints for Non-Criminal Complaints This section deals with the handling of non-criminal complaints. Criminal complaints are to be handled as specified in 20 CFR Part 629.55

A. Introduction to Complaints and Grievances 1. Complaints A complaint is an allegation of discrimination on the grounds of race, color, religion, sex, national origin, age, disability, political affiliation or belief, or participation in the program, and is covered by the nondiscrimination and equal opportunity provisions at 29 CFR Part 37.30

An allegation of retaliation, intimidation or reprisal for taking action or participating in any action to secure rights protected under WIOA Section 188 will be processed as a complaint.

2. Grievances A grievance is a complaint about services, working conditions, wages, work assignment, etc., arising in connection with WIOA programs operated by WIOA recipients including service providers, eligible training providers, and other contractors.

In order to direct a complaint or grievance properly, it must be determined whether the complaint is a program or discrimination complaint. When a participant or employee alleges unfair treatment, find out what she or he believes to be the reason for the treatment. It is appropriate to ask the complainant if the alleged unfair treatment was due to one of the prohibited factors under the nondiscrimination and equal opportunity regulations at 29 CFR Part 37 or related to working conditions such as work scheduling or assignments.

If the individual alleging unfair treatment cannot or does not cite a reason that it is a prohibited factor, then the complaint must be processed using the separate grievance procedure.

NOTE: A complaint cannot be processed as both a program complaint and as a discrimination complaint.

B. Filing A Grievance 1. Who May File Any individual, including WIOA program participants, applicants, staff, employers, board members or any other individual who believes they received unfair treatment in a Workforce Innovation and Opportunity Act employment and training program may file a grievance.

2. When Should a Grievance Be Filed Grievances must be filed within one (1) year of the alleged occurrence.

3. Where May a Grievance Be Filed Grievances may be filed directly with the service provider or with the State Equal Opportunity Officer.
4. The Grievance Process

a. The service provider may attempt to resolve the issue informally within fourteen (14) calendar days following the filing of the grievance. If the grievance is filed directly with the State Equal Opportunity Officer, the EO officer will work with the service provider and the grievant to attempt to resolve the issue informally.

Whether or not conciliation occurs, a written agreement (the WIOA Conciliation Form is recommended for use but is not mandatory and an appropriate substitute form may be used) shall be executed, signed by both the grievant and the service provider.

b. The grievant has the right to a due process hearing if informal resolution cannot be reached. The grievant must be advised of the possibility of a due process hearing within thirty (30) days from the date the grievance was filed; and

c. The grievant has the right to a receipt of a final decision within sixty (60) days from the date the grievance was filed.

C. Filing a Complaint

1. Who May File
   Any applicant or registrant requesting aid, benefits, or seeking services or training through the WIOA One-Stop workforce system; eligible applicants/registrants; participants; employees; applicants for employment; service providers, eligible training providers (as defined in 29 CFR Part 37.4 and staff; and staff within the Connecticut Department of Labor and Industry (State Oversight Agency); who believes that he/she or any other specific class of individuals, has been or is being subjected to discrimination prohibited under the Nondiscrimination and Equal Opportunity Provisions at 29 CFR Part 37 and Section 188 of the Workforce Innovation and Opportunity Act of 2014 including: Race, color, sex, age, national origin, religion, disability, political affiliation or belief, citizenship (beneficiaries only), and participation in any programs under WIOA Title IB (beneficiaries), must be given the option to file a written complaint by his/herself or through a representative to the State of Connecticut Workforce Innovation and Opportunity Act Equal Opportunity Officer or the Civil Rights Center.

Where possible the identity of any person who has furnished information relating to, or assisted in an investigation of a possible violation of the Act will be held in confidence to the extent possible with a fair determination of the issues.

2. When Must A Complaint Be Filed
   Complaints must be filed within 180 days of the alleged discrimination. When a complaint is untimely filed with the State Workforce Innovation and Opportunity Act Equal Opportunity Officer the complaint WILL NOT be processed until a waiver of the filing period is received from the Director of the Civil Rights Center. The State Workforce Innovation and Opportunity Act Equal Opportunity Officer will assist the complainant in requesting the waiver from the Civil Rights Center. The Director of the Civil Rights Center may, for good cause shown, extend the filing time.

3. Where May a Complaint Be Filed
   § 683.620 Complaints of suspected fraud, waste, abuse, or other criminal activity in the WIA program in Connecticut that do not meet the criteria of “emergency” (see “Definitions” section and instructions for reporting emergencies) must be reported as follows:

   1. Complaints may be telephoned to the DOL OIG Hotline at (800) 347-3756 (toll free) or (202) 693-6999 (this is not a toll free number) or emailed to hotline@oig.dol.gov.

   The OIG operates the Hotline to receive and process allegations of fraud, waste, and abuse concerning Department grants, contracts, programs and operations. The OIG also uses the Hotline
to address allegations of criminal activity and serious misconduct involving Department employees. The OIG will prepare referrals of Hotline allegations and transmit them to OFAM.

2. Complaints may be reported in writing by completing the attached Incident Report (IR) (OIG 1-156) and mailing it to:

Office of the Inspector General Complaints Analysis Office 200 Constitution Avenue, NW Room S-5506 Washington, D.C. 20210

Or, alternatively, to:

Regional Inspector General for Investigations Government Center John F. Kennedy Federal Building 25 New Sudbury Street Boston, MA 02203

A copy of the report must simultaneously be forwarded to both of the following: U.S. Department of Labor Employment and Training Administration John F. Kennedy Federal Building, Room E-350 25 New Sudbury Street Boston, MA 02203

Connecticut Department of Labor Program Policy Unit 200 Folly Brook Blvd. Wethersfield, CT 06109 (or via fax to CTDOL’s Program Policy Unit at (860) 263-6768).

The copy of the complaint received by CTDOL will be tracked and reported as follows by Program Policy:

• Receipt of the report will be recorded in an incident reporting log maintained in Program Policy.
• Program Policy will inform the Commissioner.

OR A COMPLAINT MAY BE FILED WITH:

Civil Rights Center The Director, Civil Rights Center (CRC) U.S. Department of Labor 200 Constitution Avenue NW Room N-4123 Washington, DC 20210

NOTE: Complaints of discrimination because of creed or marital status pursuant to Title 49 Human Rights of the Connecticut Codes Annotated (MCA) will be referred to the Connecticut Human Rights Commission.

4. What Information Must be in the Complaint Each complaint must be in writing and must include: (a) Complainant’s name and address (or specify another means of contacting him or her. (b) The identification of the respondent (the individual or entity that the complainant alleges is responsible for the discrimination); (c) A description of the complainant’s allegations in sufficient detail to allow the State Equal Opportunity Officer and/or the Civil Rights Center to determine whether the complaint: (1) Falls within the Workforce Innovation and Opportunity Section 188 and Equal Opportunity and Nondiscrimination Regulations at 29 CFR Part 37; (2) Was filed timely; (3) Has merit; in other words, if the allegations are true there was a violation of nondiscrimination and equal opportunity provisions; and (4) The complainant’s or the complainant’s authorized representative signature on the complaint.
Service providers should assist the aggrieved party in filing a written complaint and/or completing the Complaint Information Form if requested. The State Workforce Innovation and Opportunity Act Equal Opportunity Officer will also assist in filing a written complaint if requested.

5. Forms To Use When Filing Complaints

Complaints will be accepted regardless of the format, however complainants are encouraged to use the Complaint Information Form (CIF – DL 1-2014a) for filing complaints of discrimination.

A copy of the Complaint Information Form is in the Forms section of this manual (service providers may reproduce the form as needed) and can also be accessed through the Civil Rights Center website at http://www.dol.gov/oasam/programs/crc/external-enforc-complaints.htm

6. The Complaint Processing Procedure

Complaints of discrimination on the basis of race, color, national origin, sex, religion, age, disability, political affiliation or belief, and for beneficiaries of Workforce Innovation and Opportunity Act Title I financially assisted programs citizenship or participation in a Workforce Innovation and Opportunity Act funded program as set forth in Section 188 of the Act will be processed as set forth in 29 CFR Part 37.70.

The complaint procedure applies to all individuals entering the One-Stop center or partner agency who are participating in the Workforce Innovation and Opportunity Act including programs and services and employment, those currently receiving Workforce Innovation and Opportunity Act services (core, intensive or training), employees of any Workforce Innovation and Opportunity Act Title IB-funded entity (Workforce Innovation and Opportunity Area staff or service providers) and applicants for WIOA Title IB funding.

a. Acknowledgement of the Complaint

The State Workforce Innovation and Opportunity Act Equal Opportunity Officer will, within ten (10) days of receipt of the complaint provide acknowledgement to the complainant of receipt of the complaint. The acknowledgement will include, in writing, a statement of the issue(s) to the complainant that provides the following information: (1) a list of issues raised by the complainant; (2) for each issue, a statement of whether or not the issue is accepted or rejected and the reasons for any rejections of an issue; (3) the options available, including Alternative Dispute Resolution or a fact-finding investigation, for processing their complaint and the time period in which the complainant has to request an Alternative Dispute Resolution or fact finding investigation; (4) a statement advising the complainant that they must request their preference of either Alternative Dispute Resolution or a fact-finding investigation within ten(10) days of receipt of written acknowledgement of their complaint; (5) the options available for processing their complaint such as an investigation or Alternative Dispute Resolution.

The State Workforce Innovation and Opportunity Act Equal Opportunity Officer will also notify complainants, within ten (10) days of receipt of the complaint, in writing, if the complaint does not fall within Workforce Innovation and Opportunity Act jurisdiction for processing complaints alleging discrimination under Section 188 or Equal Opportunity and Nondiscrimination provisions at 29 CFR Part 37. That notification shall include the basis of the determination as well as a statement of the complainant’s right to file with CRC within thirty (30) days. NOTE: The Director of CRC may extend the 30-day time period for good cause shown.

Following the determination that: (1) the complaint has merit; (2) is within the Workforce Innovation and Opportunity Act jurisdiction; and (3) the complainant has chosen the manner in which she or he wants their complaint processed the State Workforce Innovation and Opportunity Act Equal Opportunity Officer will provide: (a) notice to all parties of the specific charges and responses of
those involved; (b) an impartial mediator if ADR is chosen; (c) notice of the right of both parties to representation; (d) notice of the right of each party to present evidence; (e) notice to each party of the right to question others who present evidence; and (f) the right to a decision made strictly on the recorded evidence.

b. Complaint Processing Time Frame (1) If a complainant elects to file a complaint with the State Workforce Innovation and Opportunity Act Equal Opportunity Officer, she or he shall allow for ninety (90) days in which to process the complaint and provide a written Notice of Final Action to the complainant.

(2) If, during the 90-day period, the complainant has: (a) Received a decision resulting from an investigation that she or he considers unsatisfactory, the complainant or his/her representative may file a complaint with CRC within thirty (30) days after the complainant is notified of the decision on the complaint. (b) Not received a Notice of Final Action (decision) or notification of resolution the complainant or his/her representative may file with the Director of CRC. The complainant must file within thirty (30) days from the date the decision should have been issued.

II. Resolution Process A. Alternative Dispute Resolution 1. Complainants must be given a choice as to the manner in which they wish to have their complaint processed, which include; an investigation conducted by the State Workforce Innovation and Opportunity Act Equal Opportunity Officer; or; through an Alternative Dispute Resolution (ADR). The choice whether to use ADR or the customary process of conducting an investigation rests entirely with the complainant. Mediation is the recommended Alternative Dispute Resolution and will be conducted by an impartial mediator provided through a contract for services between the Bureau and the Employment Relations Division of the Connecticut Department of Labor and Industry.

Complainants must notify the State Workforce Innovation and Opportunity Act Equal Opportunity Officer within ten (10) days after receiving the letter acknowledging their complaint of their choice of complaint processing through Alternative Dispute Resolution.

The Employment Relations Division of the Connecticut Department of Labor and Industry will provide an impartial mediator and will provide interested parties information regarding the manner in which the mediation will be conducted; and the date, time and place for mediation.

2. Time Frame The period for attempting to resolve the complaint through mediation is twenty (20) days from the date the complainant chooses mediation. a. Successful Mediation Upon completion of successful mediation the complainant and respondent will both sign a conciliation agreement attesting that the complaint has been resolved. A copy of the conciliation agreement will be provided to the State Workforce Innovation and Opportunity Act Equal Opportunity Officer within ten (10) days of the date the conciliation agreement was signed. b. Unsuccessful Mediation In the event that mediation was not successful the complainant has the option of requesting a fact-finding investigation.

The request for a fact-finding investigation must be submitted, in writing, within ten (10) days after the complainant determines that the mediation was unsuccessful to the State Workforce Innovation and Opportunity Act Equal Opportunity Officer.

Complainants may not request mediation after a hearing or fact-finding investigation process has taken place.
B. Fact-Finding Investigation Process If the complainant requests an investigation as his or her choice of resolution the State WIOA Equal Opportunity Officer will have sixty (60) days from the date the complaint was filed, in which to conduct an investigation. The investigation may include interviewing the complainant and respondent, interviewing witnesses, and reviewing pertinent files and records.

In order to meet the ninety (90) day time frame for issuing decisions and allow the State WIOA Equal Opportunity Officer adequate time to conduct an investigation should the mediation fail, the State will have thirty (30) days in which to investigate the complaint. The mediator will notify the State Workforce Innovation and Opportunity Act Equal Opportunity Officer immediately that the mediation process was unsuccessful.

C. Complainant Responsibility The complainant may amend the complaint at any point prior to: 1. the beginning of mediation; or 2. the fact-finding investigation

The complainant may withdraw the complaint at any time.

If at any time during the process the complainant fails to cooperate, she or he shall be given notice that the complaint will be administratively closed within ten (10) calendar days, unless good cause is shown.

D. Breach of Agreement Any party to any agreement reached under ADR may file a complaint with the Director of the Civil Rights Center in the event the agreement is breached. The non-breaching party may file a complaint with the Director within thirty (30) days of the date that party learns of the alleged breach.

If the parties do not reach an agreement under ADR, the complainant may file a complaint with the Director of the Civil Rights Center. The address for filing in the event of a breach in the agreement or lack of agreement follows: Director, Civil Rights Center (CRC) U.S. Department of Labor 200 Constitution Avenue NW, Room N-4123 Washington, DC 20210

E. Waivers The State Workforce Innovation and Opportunity Act Equal Opportunity Officer may grant a waiver, for good cause, if it appears that additional time is needed to make all reasonable efforts to resolve the complaint. An example of a good cause might be one of the following: 1. Mediation may be the availability, or lack of, of a mediator(s) during the time frame for the mediation period, or an acceptable conflict with the time frame by the complainant; 2. Investigations may be issues with schedules for interviews or availability of staff to conduct an investigation.

The waiver may be requested by the complainant, the respondent, service provider, mediator or the State Workforce Innovation and Opportunity Act Equal Opportunity Officer. Waivers must be agreed to and signed by both the complainant and respondent.

F. Administrative Decision The State will have ninety (90) days from the date the complaint was received to issue a decision.

The Commissioner of the Department of Labor and Industry will issue the final decision based on recommendations from the Workforce Innovation and Opportunity Act Equal Opportunity Officer.

III. Service Provider and Employer Responsibilities In order to meet the complaint processing requirements in the Workforce Innovation and Opportunity Act Equal Opportunity and
Nondiscrimination Regulations at 29 CFR Part 37.77 and Connecticut’s Equal Opportunity and Nondiscrimination Methods of Administration all Workforce Innovation and Opportunity Act Title IB funding recipients including: WIOA Title IB providers of intensive and training services; and employers including private-for-profit employers of Workforce Innovation and Opportunity Act participants must adopt this complaint procedure for complaints alleging violations of any prohibited factor under the equal opportunity and nondiscrimination provisions of the Workforce Innovation and Opportunity Act. Adoption of these elements should be noted in personnel handbooks.

Designated Equal Opportunity Officers Workforce Innovation and Opportunity Act Title I adult, youth and dislocated worker service providers as defined in Equal Opportunity and Nondiscrimination Regulations at 29 CFR Part 37.4 (REGS NOT OUT YET) are not required to designate an Equal Opportunity Officer with the same responsibilities as the State designated Equal Opportunity Officers. However, they must assign an individual the responsibility of: 1. ensuring equal opportunity and nondiscrimination is applied to everyone; 2. assisting the individual in completing the Complaint Information Form (DL 1-2014a) and advising them of their right to file a complaint with the State Workforce Innovation and Opportunity Act Equal Opportunity Officer OR the Civil Rights Center; and 3. serving as liaison for Equal Opportunity and Nondiscrimination matters between the agency and the State Designated Equal Opportunity Officer. As liaison that individual will be the contact person during due process activities.

IV. Complaints Alleging Retaliation, Intimidation or Reprisal Complaints alleging retaliation for taking actions or participating in any action to secure rights protected under the equal opportunity and nondiscrimination provisions found in Section 188 and 29 CFR Part 37 of the Workforce Innovation and Opportunity Act may be filed using the procedures described above.

EVALUATION AND TECHNICAL ASSISTANCE

Monitoring, evaluation and technical assistance is an integral part of the oversight responsibilities required by law. Monitoring and evaluation identify areas of strength and weakness in program operation with the intent of improving program performance. Technical assistance increases program operation and management capabilities.

Monitoring is an essential part of program management to ensure compliance with appropriate laws, regulations, plans, provider agreements, policies and procedures. Monitoring provides the opportunity to strengthen or improve programs and systems to promote continuous improvement.

The One Stop Operator may conduct supplemental oversight reviews of providers to determine the extent to which the provider is assisting in the development and operation of the One Stop Center. The One Stop Operator may recommend that a service provider take a course of corrective action for any deficiencies found in the provider’s operations that relate to the One Stop Center.

Special onsite reviews may be conducted to investigate allegations of mismanagement or to clarify unusual findings. Special reviews may or may not result in corrective action. A special review could lead to the implementation of an investigation of known or suspected incidents of fraud, program abuse, or criminal conduct.

A. Monitoring Process § 683.410 1. The DOL WIOA Administration unit conducts program, data and fiscal monitoring and evaluation of service providers annually. Monitoring is conducted to review the previous program year(s). On-site monitoring and/or limited scope reviews may consist of interviews with appropriate staff and reviews of policies, procedures, accounting reports, source documents,
and other records as considered necessary pertaining to any or all of WIOA Title IB activities including: a. Fiscal b. Adult c. Youth d. Dislocated Worker (Formula) Dislocated Worker (NEG) e. On-the-Job Training f. Customized Training
g. CT American Job Centers (security access, timely and accurate input at provider level) h. Data Validation i. Eligible Training Provider List j. The One-Stop System including One-Stop Operators, Centers and Service Providers

2. Monitoring may be conducted onsite with additional oversight conducted by telephone, desk reviews of documents and reports, and such other means as deemed necessary by the DOL WIOA administration unit. Members of entities such as One-Stop Operators, State Workforce Investment Board members, or U.S. Department of Labor may accompany onsite monitors.

3. Regular oversight and monitoring of WIOA activities and providers of core, intensive and training services is conducted to ensure compliance with WIOA requirements including: a. Compliance with the uniform administrative requirements described in WIOA Law Title IB Section 181 and USDOL uniform administrative requirements, including the appropriate administrative requirements and applicable cost principles at WIOA Reg. Subpart B for all entities receiving WIOA title IB funds. b. Compliance with applicable laws and regulations in accordance with the State’s monitoring system; c. Determining that expenditures have been made against the cost categories and within the cost limitations specified in the Act and Regulations and in this part; d. Ensuring that established policies are achieving program quality and outcomes meet the objectives of the Act and the WIOA regulations; e. Compliance with the nondiscrimination and equal opportunity requirements of WIOA section 188 and 29 CFR part 37. Requirements for these aspects of the monitoring system are set forth in 29 CFR 37.54(d)(2)(ii); f. Compliance with data collection and reporting system policies and procedures; g. Determining whether or not there is compliance with other provisions of the Act and the WIOA regulations and other applicable laws and regulations; and h. Determining if service providers and contractors have demonstrated substantial compliance with WIOA requirements.

§ 683.420 4. Findings of Noncompliance: If, as a result of financial and compliance audits or otherwise, the Bureau has determined that noncompliance with the uniform administrative requirements found at 29 CFR part 95 or part 97, as appropriate, the requirements referred to in WIOA Sections 181 and 184, 29 CFR Part 37, or any other substantial violation of WIOA Title IB, the DOL WIOA Administration unit will require corrective action to secure prompt compliance.

5. Failure to Take Corrective Action: If, as a result of financial and compliance audits or otherwise, the DOL WIOA Administration unit has determined a substantial violation of specific provisions of WIOA Title IB, and corrective action has not been taken, the Bureau may: a. provide technical assistance as necessary and appropriate; b. prohibit the use of eligible providers; c. select an alternative entity to provide services; d. withhold one (1) percent of the service provider’s administrative total accrued expenditures to date. If the service provider does not receive administrative funding, one (1) percent of total accrued expenditures to date will be withheld.

B. Monitoring Definitions Area of Concern: When the monitor finds a practice that might lead to noncompliance of law, rule, or policy. This would be used for a questionable practice but not a practice that is definitely out of compliance. In the report the monitor would word this as a matter of technical assistance or chance for improvement. Depending on the concern, the provider may or may not respond to these on the report. The Area of Concern should be followed by a recommendation.
Recommendation: Technical Assistance given in writing to the provider addressing an area of concern.

Compliance Findings: When the monitor finds a practice that appears to be in violation of law, rule, or policy. Any time documentation is missing for enrollment, eligibility, data validation, etc. this would be a compliance finding. The Compliance Finding would be immediately followed by Action Required. The compliance finding will reference the law, regulation, or policy that is not being followed.

Action Required: The action the provider must take to resolve the Compliance Finding.

Questioned Cost: Used when monitors find unallowable purchases and/or incorrect or documentation is missing for activities, services or payments that were made with program dollars. The payment is questioned until the provider has a chance to respond and resolve the discrepancy.

Disallowed Cost: Used when the provider cannot provide the documentation to support a questioned cost that is a clear violation of policy, rule or law. The provider has the responsibility to reimburse the program with non-federal funds.

Providers can collect repayment from the participant, if applicable, but it is at their discretion and the responsibility lies with the provider to repay the cost within the report/response deadline.

Best Practice: Given when the monitor finds good work the provider is doing!

Corrective Action: The action plan that the provider will initiate to resolve their Compliance Findings and/or Areas of Concern within the monitoring time period. This basically means the actions the provider does to bring themselves into compliance.

Formal Corrective Action: This is when a service provider has severe problems with the monitoring and requires additional monitoring for a specific period of time (usually one year) to ensure they are in compliance. Being on Formal Corrective Action requires the provider to outline what happened on the next Request for Proposal.

C. Schedules and Timelines for Monitoring 1. Schedule for monitoring service providers [reserved]

2. Timeline Date set for onsite review 30 days before review Onsite review is conducted Entrance and Exit Interviews Conducted at the time of the onsite review Report to Service Providers 60 days after onsite review Corrective Action Plan due 30 days from date the report was received Accept or Deny Corrective Action Plan 45 days from date Corrective Action Plan was received by the State Corrective Action taken 30 days after approval of corrective action plan Requests to extend corrective action plan are negotiable Follow-up Within 30 but no more than 120 days after approval of corrective action plan.

D. Evaluation Evaluation is the measurement of the effectiveness of programs in meeting objectives, program goals and performance standards. Evaluations are intended to promote, establish, implement, and utilize methods for continuously improving workforce activities in order to achieve high-level performance within, and high-level outcomes from the statewide workforce investment system.
CTDOL WIOA Administration unit will also analyze the data collected from the Customer Satisfaction surveys of participants and employers. A report will be written and presented to the SWIB on an annual basis. Other reports as requested from the SWIB will be produced on behalf of the workforce system. From these reports, the SWIB and Bureau will be able to assess how effective the programs are in meeting objectives and goals and recommend any improvements that need to be made.

E. Technical Assistance Technical assistance and training may be recommended by the CTDOL WIOA Administration unit or requested by the service provider. Technical assistance may be the means of improving program operations, facilitating the implementation of corrective action or providing information. Service providers will not be monitored on the quality or compliance of their programs during technical assistance visits but will be provided direction to improve quality and compliance issues. State program managers may provide technical assistance and training directly or outside sources may be used. Such requests should be coordinated through the appropriate program manager or specialist.

Requests for minor technical assistance may be submitted verbally or in writing. If major assistance or assistance in several areas is requested, the request should be in writing so that staff has sufficient information to decide on the most appropriate form and level of assistance to provide. If several service providers request assistance in related areas, a general training session may be scheduled.

Program managers may schedule technical assistance visits to service providers to provide information or special training, discuss areas of concern, evaluate program operation, or any combination thereof.

Service provider attendance is required at state-sponsored technical assistance sessions.

WAIVERS

The purpose of the general statutory and regulatory waivers is to provide flexibility to states and local areas and enhance their ability to improve the statewide workforce investment system.

Workforce Innovation and Opportunity Areas may request waivers to address impediments to the implementation of the strategic plan, including the continuous improvement strategy, consistent with key principles of WIOA. These key principles include: • Streamlining services and information to participants through a one-stop delivery system; • Empowering individuals to obtain needed services and information to enhance their employment opportunities; • Ensuring universal access to career employment-related services; • Increasing accountability of state, localities and training providers for performance outcomes; • Establishing a stronger role for the private sector; • Providing increased state flexibility to implement innovative and comprehensive workforce investment systems; and • Improving youth programs through services that emphasize academic and occupational learning. 20 CFR Part 679.620

A. Exceptions to Waivers The Secretary may waive any of the statutory or regulatory requirements of WIOA Title IB with the exception of the following: 1. Wage and labor standards; 2. Non-displacement protections; 3. Worker rights; 4. Participation and protection of workers and participants; 5. Grievance procedures and judicial review; 6. Nondiscrimination; 7. Allocation of funds to local areas; 8 Eligibility of providers and participants; 9. Establishment and function of local areas and local boards; 10. Procedures for review and approval of State plans; 11. The funding of
infrastructure costs for one-stop centers; 12. Priority of Service; and 13. Other requirements relating to the basic purposes of Title I of WIOA as described in 675.100. 20 CFR Part 679.610

B. Waiver Requests A participant, service provider, eligible training providers or the State Workforce Innovation Board may request a waiver however it is only the Governor that may request the waiver from the Secretary. The waiver request may be for the entire State or for local workforce investment areas.

Waiver requests must include: 1. Statutory or regulatory requirements of the waiver; 2. Actions taken by the State to remove State statutory or regulatory barriers; 3. Goals of the waiver and expected programmatic outcomes if waiver is approved; 4. Description of how the waiver will align with USDOL’s policy priorities, such as: a. supporting employer engagement; b. connecting education and training strategies; c. supporting work-based learning; d. improving job and career results, and e. other priorities as prescribed in the forthcoming guidance. 5. Description of 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. Description of the processes used to: a. Monitor the progress in implementing the waiver; b. Provide notice to any Local Board affected by the waiver; c. Provide any Local Board affected by the waiver the opportunity to comment on the waiver request; d. Ensure meaningful public comment by business and organized labor; and e. 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.

The State generally receives a decision on a waiver request from the Secretary within 90 days after the receipt of the original request.

C. Process for Submitting a Waiver Request 1. All requests for waivers of statutory or regulatory requirements must first be submitted to DOL WIOA Administration Unit. 2. Requests must be in writing and contain sufficient information which includes: where, why, how, when. Any lack of information may result in a delay or denial of the waiver. 3. CTDOL will work with the Governor to submit the waiver request.

D. Process for Submitting a Statewide Waiver Request CTDOL may approve or disapprove certain requests for waivers that are not submitted to U.S.D.O.L. Statewide waiver requests must be submitted to CTDOL WIOA Administration unit who will review the request to determine if the request affects performance standards or as specifically stated in law or regulation. Examples of statewide waiver requests may be: 1. Findings of monitoring; 2. Eligible training issues such as out-of-state providers or time frames for getting providers on the State list for the participant’s training.

3. WDBs are to report waiver utilization and the impact of waivers on performance to CTDOL via the “WDB Waiver Utilization and Oversight Report.” The form must be completed quarterly in each program year and submitted to CTDOL by the 20th day of the month following the last day of the quarter. Each report item must be completed and responses must provide sufficient detail to describe the effect of each waiver; specifically, how the waiver changed the activities of the local area or led to innovations, and how the activities carried out under the waiver directly or indirectly affected local performance. The form reflects current waivers and, therefore, any changes regarding waivers in the coming program years will require CTDOL to revise the form. The form may also be changed by CTDOL in future program years to reflect any additional federal guidance issued on waivers or the annual report (in regard to reporting on waivers).
4. The report, which must be submitted via email to CTDOL WIA area liaisons, will be reviewed by CTDOL to fulfill waiver tracking, monitoring, and reporting requirements. Questions regarding this issuance may be directed to the WIA Administration Unit at (860) 263-6590. § 679.620 Under what conditions may a Governor request, and the Secretary approve, a general waiver of statutory or regulatory requirements under the Workforce Innovation and Opportunity Act?

(a) The Secretary will issue guidelines under which the States may request general waivers of WIOA and Wagner-Peyser Act requirements.

(b) A Governor may request a general waiver in consultation with appropriate chief elected officials:

(1) By submitting a waiver plan which may accompany the State’s WIOA 4-year Unified or Combined State Plan or 2-year modification; or (2) After a State’s WIOA Plan is approved, by separately submitting a waiver plan. (c) A Governor’s waiver request may seek waivers for the entire State or for one or more local areas within the State.

(d) A Governor requesting a general waiver must submit to the Secretary a plan to improve the statewide workforce development system that:

(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 (i) Supporting employer engagement; (ii) Connecting education and training strategies; (iii) Supporting work-based learning; (iv) Improving job and career results, and (v) Other priorities as articulated in guidance.

(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 the request; (6) Describes the processes used to:

(i) Monitor the progress in implementing the waiver; (ii) Provide notice to any Local WDB affected by the waiver; (iii) Provide any Local WDB affected by the waiver an opportunity to comment on the waiver; and (v) 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.

(e) The Secretary will issue a decision on a waiver request within 90 days after the receipt of the original waiver request.

(f) The Secretary will approve a waiver request if and only to the extent that:

(1) The Secretary determines that the requirements for which a waiver is requested impede the ability of either the State or local area to implement the State’s Plan to improve the statewide...
workforce development system; (2) The Secretary determines that the waiver plan meets all of the requirements of WIOA sec. 189(i)(3) and §§ 679.600 through 679.620; and (3) The State has executed a memorandum of understanding (MOU) with the Secretary requiring the State to meet, or ensure that the local area meets, agreed-upon outcomes and to implement other appropriate measures to ensure accountability.

(g) A waiver may be approved for as long as the Secretary determines appropriate, but for not longer than the duration of the State’s existing Unified or Combined State Plan.

(h) The Secretary may revoke a waiver granted under this section if the Secretary determines that the State has failed to meet the agreed upon outcomes, measures, failed to comply with the terms and conditions in the MOU described in paragraph (f) of this section or any other document establishing the terms and conditions of the waiver, or if the waiver no longer meets the requirements of §§ 679.600 through 679.620.

WORKFORCE FLEXIBILITY PLAN § 679.630 A. State may submit to the Secretary, and the Secretary may approve, a workforce flexibility (workflex) plan under which the State is authorized to waive, in accordance with the plan: Any of the statutory or regulatory requirements under title I of WIOA applicable to local areas, if the local area requests the waiver in a waiver application, except for:

1. Requirements relating to the basic purposes of title I of WIOA described in § 675.100
2. Wage and labor standards;
3. Grievance procedures and judicial review;
4. Nondiscrimination;
5. Eligibility of participants;
6. Allocation of funds to local areas;
7. Establishment and functions of local areas and Local WDBs;
8. Procedures for review and approval of local plans; and worker rights, participation, and protection.
9. Any of the statutory or regulatory requirements applicable to the State under secs. 8 through 10 of the Wagner-Peyser Act (29 U.S.C. 49g-49i), except for requirements relating to: • The provision of services to unemployment insurance claimants and veterans; and • Universal access to basic labor exchange services without cost to job seekers.
10. Any of the statutory or regulatory requirements applicable under the Older Americans Act of 1965 (OAA) (42 U.S.C. 3001 et seq.), to State agencies on aging with respect to activities carried out using funds allotted under OAA sec. 506(b) (42 U.S.C. 3056d(b)), except for requirements relating to: • The basic purposes of OAA; • Wage and labor standards; • Eligibility of participants in the activities; and • Standards for grant agreements. B. A workforce flexibility plan submitted under paragraph (a) of this section must include descriptions of:
(1) The process by which local areas in the State may submit and obtain State approval of applications for waivers of requirements under title I of WIOA;

(2) A description of the criteria the State will use to approve local area waiver requests and how such requests support implementation of the goals identified State Plan;

(3) The statutory and regulatory requirements of title I of WIOA that are likely to be waived by the State under the workforce flexibility plan;

(4) The statutory and regulatory requirements of secs. 8 through 10 of the Wagner- Peyser Act that are proposed for waiver, if any;

(5) The statutory and regulatory requirements of the OAA that are proposed for waiver, (6) The outcomes to be achieved by the waivers described in paragraphs (b)(1) to (b)(5) of this section including, where appropriate, revisions to adjusted levels of performance included in the State or local plan under title I of WIOA, and a description of the data or other information the State will use to track and assess outcomes; and

(7) The measures to be taken to ensure appropriate accountability for Federal funds in connection with the waivers.

(c) A State’s workforce flexibility plan may accompany the State’s Unified or Combined State Plan, 2-year modification, or may be submitted separately as a modification to that plan.

(d) The Secretary may approve a workforce flexibility plan consistent with the period of approval of the State’s Unified or Combined State Plan, and not for more than 5 years.

(e) Before submitting a workforce flexibility plan to the Secretary for approval, the State must provide adequate notice and a reasonable opportunity for comment on the proposed waiver requests under the workforce flexibility plan to all interested parties and to the general public.

(f) The Secretary will issue guidelines under which States may request designation as a work-flex State. These guidelines may require a State to implement an evaluation of the impact of work-flex in the State.$ 679.640 What limitations apply to the State’s Workforce Flexibility Plan authority under the Workforce Innovation and Opportunity Act?

(a)(1) Under work-flex waiver authority a State must not waive the WIOA, Wagner- Peyser Act or OAA requirements which are excepted from the work-flex waiver authority and described in § 679.630(a).

(2) Requests to waive statutory and regulatory requirements of title I of WIOA applicable at the State level may not be granted under work-flex waiver authority granted to a State. Such requests only may be granted by the Secretary under the general waiver authority described at §§ 679.610 through 679.620. (b) As required in § 679.630(b)(6), States must address the outcomes to result from work-flex waivers as part of its workforce flexibility plan. The Secretary may terminate a State’s work-flex designation if the State fails to meet agreed-upon outcomes or other terms and conditions contained in its workforce flexibility plan. STATEWIDE PERFORMANCE AND SANCTIONS
A. One Stop Operator Performance
One Stop Operator Performance will be evaluated based on the Terms and Provisions and Scope of Service in their One Stop Operator Agreement.

B. Service Provider Performance
Federal Performance Measures will be applied to all service providers. Service providers must meet all of the Federal performance measure levels applicable to the program(s), Adult, Dislocated Worker or Youth, for which they receive funding. Service providers that fail to meet applicable performance standards will be subject to sanctions. (See following chart)

STATE OF CONNECTICUT PERFORMANCE LEVELS PROGRAM YEAR 2016 July 1, 2016 – June 30, 2017

Workforce Innovation and Opportunity Act Performance Goals (State Plan) State Plan Performance Goals PY 16 Adult Employment (Second Quarter after Exit) 56.4 Employment (Fourth Quarter after Exit) 51.3 Median Earnings (Second Quarter after Exit) 3325.00 Credential Attainment Rate 32 Dislocated Worker Employment (Second Quarter after Exit) 63.1 Employment (Fourth Quarter after Exit) 55.5 Median Earnings (Second Quarter after Exit) 5700.78 Credential Attainment Rate 37 Youth Employment (Second Quarter after Exit) 62.2 Employment (Fourth Quarter after Exit) 59.0 Median Earnings (Second Quarter after Exit) Credential Attainment Rate 67

C. Performance Calculations
Acceptable performance for each measure is calculated based on negotiated factors which are explained in the management information system section.

D. Sanctions
Sanctions ensure that service providers and the overall workforce investment area have adequate tools to maintain high standards of performance. Sanctions provide technical assistance to improve performance, and the understanding necessary to take the proper action in the event program performance is not improved.

Sanctions may be applied to the One Stop Operator and to individual service providers for failing to meet performance.

CTDOL WIOA Administration unit will provide information regarding sanction issues to the appropriate committee(s) of the CETC. Sanctions include, but are not limited to, the steps described below. The steps are progressive in nature, that is, failure to comply with step one may lead to the action set forth in step two.

1. Corrective action planning and implementation. 2. Placement on probationary status. Probationary status is a period of not more than two years in which the District or service provider may have funding reduced or de-obligated; must maintain monthly contact with Bureau staff and make appropriate status reports until the District or service provider has clearly indicated that problems and concerns are corrected. 3. Reduction or de-obligation of all or part of the funds. 4. Re-allotment of funds. 5. Termination of the Provider Agreement.

E. General Guidelines for Application of Sanctions
Sanctions will be based on the severity of the performance problem as follows: 1. Failure to achieve at least 80% of the negotiated rate on any performance measure in any one year. 2. Failure to attain at least an 80% Composite Performance Rate (all program measures) for a program in any one year, the Bureau will provide technical assistance and require the service provider to develop a Corrective Action Plan for that program to improve performance. State Oversight Staff will notify the appropriate committee of the SWIB, who will review and monitor the plan and recommend that the service provider be placed on probation. 3. Failure to attain at least an 80% Composite Performance Rate (all program measures) for a program...
in any two consecutive years, CTDOL WIOA Administration unit will notify the CETC, who will recommend de-obligation or termination of the Provider Agreement.

CTDOL WIOA Administration unit will provide technical assistance and require corrective action. F. Other Sanctions 1. Failure to perform. Workforce Development boards will monitor the service provider’s performance as per individual Agreements. Performance will be based on plan versus actual expenditures of funds and fulfillment of the Terms and Provisions and Scope of Services. The process will include monthly program and fiscal desk review; regular communication with operators and providers; attendance at training and technical assistance sessions; Monthly Status Reports; and Agreement Modifications and Monitoring.

Service providers found deficient in any of these areas will submit a corrective action plan to the Boards. The Boards will provide the appropriate technical assistance.

Should a service provider fail to fulfill the corrective action, and Board staff has exhausted the viability of technical assistance as a remedy to correct the problem, staff will forward the information to the appropriate committee(s) of the WDB indicating that the service provider be placed on probationary status.

Failure to successfully complete all terms of the probationary status may result in recommending de-obligation of funds and/or that the service provider became ineligible for any future funding consideration.

2. In cases of claims of known or suspected incidents of fraud, malfeasance, misapplication of funds, gross mismanagement, or other criminal activities in federally-funded programs, the WDB will report all known information on the Federal Incident Report (20 CFR 629.55). In addition, Oversight staff may initiate a special investigation or audit of the incident. The special investigation or audit may include, but is not limited to additional on-site monitoring and/or a financial audit conducted by a third-party auditing firm. For the purpose of this section the following definitions apply: a. Fraud, Malfeasance, Nonfeasance or Malfeasance Fraud Misfeasance and nonfeasance or malfeasance should be considered broadly as any alleged deliberate action that is apparently in violation of Federal statutes and regulations. This category includes, but is not limited to, indications of bribery, forgery, extortion, embezzlement, theft of participant checks, kickbacks from participants, intentional payment to a contractor or service provider without the expectation of receiving services, payments to ghost enrollees, misuse of appropriated funds, and misrepresenting information in official reports.

b. Misapplication of funds Misapplication of funds should be considered as any alleged use of funds, assets, or property not authorized or provided for under the Workforce Innovation and Opportunities Act or regulations, grants, agreements or contracts. This category includes, but is not limited to, nepotism, political patronage, use of participants for political activities, ineligible participants, conflict of interest, failure to report income from Federal funds, violation of agreement contract/grant procedures, and the use of Federal funds for other than specified purposes.

c. Gross Mismanagement Gross mismanagement should be considered as actions or situations arising out of management ineptitude or oversight, leading to major violations of WIOA processes, regulation, or agreement contract/grant provisions which could severely hamper the accomplishment of program goals. These include situations that lead to waste of government resources and could jeopardize future support for a particular project. This category includes, but is not limited to, non-auditable records, unsupported costs, highly inaccurate fiscal or program reports, payroll discrepancies, payroll deductions not paid to Internal Revenue Service, and the lack of good internal control procedures. d. Employee/Participant Misconduct Employee/participant misconduct should be
considered as actions occurring during or outside work hours that reflect negatively on the Department of Labor, the State of Connecticut, the WDB’s or the WIOA program. Misconduct may include, but is not limited to, conflict of interest or the appearance of conflict of interest involving outside employment, business, and professional activities, the receipt or giving of gifts, fees, entertainment and favors, misuse of Federal property, misuse of official information and such other activities as might adversely affect the confidence of the public, as well as serious violations of Federal and State laws.

All program activities may be suspended during the time that a special investigation or audit is being conducted. Following completion of the special investigation or audit, action taken may include, but is not limited to: 1. Reinstatement; 2. For audits, resolutions as prescribed in the Fiscal Section of this Policy Manual; 3. Reduction or de-obligation of all or part of the funds awarded to a service provider or operator; 4. Placement on Probationary Status. 5. Termination of all or part of the operator or provider agreement with possible repayment of funds; 6. Civil or criminal prosecution, if warranted.

§ 683.650 What procedures apply to the appeals of the Governor’s imposition of sanctions for substantial violations or performance failures by a local area?

(a) A local area which has been found in substantial violation of WIOA title I, and has received notice from the Governor that either all or part of the local plan will be revoked or that a reorganization will occur, may appeal such sanctions to the Secretary under WIOA sec. 184(b). The appeal must be filed no later than 30 days after receipt of written notification of the revoked plan or imposed reorganization, until:

(b) The sanctions described in paragraph (a) of this section do not become effective

(1) The time for appeal has expired; or (2) The Secretary has issued the decision described in paragraph (e) of this section.

(c) A local area which has failed to meet local performance indicators for 3 consecutive program years, and has received the Governor’s notice of intent to impose a reorganization plan, may appeal to the Governor to rescind or revise such plan, in accordance with § 677.225 of this chapter.

(d) Appeals to the Secretary made under paragraph (a) of this section must be submitted by certified mail, return receipt requested, to the Secretary, U.S. Department of Labor, 200 Constitution Ave. NW, Washington, DC 20210, Attention: ASET. A copy of the appeal must be simultaneously provided to the Governor.

(e) The Secretary will notify the Governor and the appellant in writing of the Secretary’s decision under paragraph (a) of this section within 45 days after receipt of the appeal. In making this determination, the Secretary may consider any comments submitted by the Governor in response to the appeals.

§ 683.700 When can the Secretary impose sanctions and corrective actions on recipients and subrecipients of title I Workforce Innovation and Opportunity Act funds? (a)(1) Except for actions under WIOA secs. 116 and 188(a) or 29 CFR parts 31, 32, 35, 38 and 49 CFR part 25, the Grant Officer must use the procedures outlined in § 683.440 before imposing a sanction on, or requiring corrective action by, recipients of funds under title I of WIOA.
(2) To impose a sanction or corrective action for a violation of WIOA sec. 188(a) the Department will use the procedures set forth in 29 CFR part 38.

(3) To impose a sanction or corrective action for a violation of WIOA sec. 116 the Department will use the procedures set forth in part 677 of this chapter.

(b) States. When a Grant Officer determines that the Governor has not fulfilled its requirements under 2 CFR part 200, an audit, or a monitoring compliance review set forth at sec. 184(a)(4) of WIOA and § 683.410, or has not taken corrective action to remedy a violation as required by WIOA secs. 184(a)(5) and 184(b)(1), the Grant Officer must require the Governor to impose the necessary corrective actions set forth at WIOA secs. 184(a)(5) and 184(b)(1), or may require repayment of funds under WIOA sec. 184(c). If the Secretary determines it is necessary to protect the funds or ensure the proper operation of a program or activity, the Secretary may immediately suspend or termination.

(c) Local areas. If the Governor fails to promptly take the actions specified in WIOA sec. 184(b)(1) when it determines that a local area has failed to comply with the requirements described in § 683.720(a), and that the local area has not taken the necessary corrective action, the Grant Officer may impose such actions directly against the local area.

(d) Direct grant recipients. When the Grant Officer determines that a direct grant recipient of subtitle D of title I of WIOA has not taken corrective action to remedy a substantial violation as the result of noncompliance with 2 CFR part 200, the Grant Officer may impose sanctions against the grant recipient.

(e) Subrecipients. The Grant Officer may impose a sanction directly against a subrecipient, as authorized in WIOA sec. 184(d)(3) and 2 CFR 200.338. In such a case, the Grant Officer will inform the direct grant recipient of the action. te financial assistance in accordance with WIOA sec. 184(e).

§ 683.730 When can the Secretary waive the imposition of sanctions? (a)(1) A recipient of title I funds may request that the Secretary waive the imposition of sanctions authorized under WIOA sec. 184.

(2) A Grant officer may approve the waiver described in paragraph (a)(1) of this section if the grant officer finds that the recipient has demonstrated substantial compliance with the requirements of WIOA sec. 184(d)(2).

(b)(1) When the debt for which a waiver request was established in a non-Federal resolution proceeding, the resolution report must accompany the waiver request.

(2) When the waiver request is made during the ETA Grant Officer resolution process, the request must be made during the informal resolution period described in § 683.440(c). when: (c) A waiver of the recipient’s liability must be considered by the Grant Officer only

(1) The misexpenditure of WIOA funds occurred at a subrecipient’s level;

(2) The misexpenditure was not due to willful disregard of the requirements of title I of WIOA, gross negligence, failure to observe accepted standards of administration, and did not constitute fraud or failure to make the required disclosures in accordance with 2 CFR part 200.113 addressing all
violations of Federal criminal law involving fraud, bribery or gratuity violations (2 CFR part 180 and 31 U.S.C 3321)

(3) If fraud did exist, was perpetrated against the recipient/subrecipients, and:

(i) The recipient/subrecipients discovered, investigated, reported, and cooperated in any prosecution of the perpetrator of the fraud; and (ii) After aggressive debt collection action, it has been documented that further attempts at debt collection from the perpetrator of the fraud would be inappropriate or futile;

(4) The recipient has issued a final determination which disallows the misexpenditure, the recipient’s appeal process has been exhausted, and a debt has been established; and

(5) The recipient provides documentation to demonstrate that it has substantially complied with the requirements of WIOA sec. 184(d)(2) and this section.

(d) The recipient will not be released from liability for misspent funds under the determination required by WIOA sec. 184(d) unless the Grant Officer determines that further collection action, either by the recipient or subrecipient(s), would be inappropriate or would prove futile.

SERVICE PROVIDER SELECTION PROCESS AND PROVIDER AGREEMENTS

This Section is designed to provide information on the service provider selection process and the provider agreements entered into with the selected providers.

I. Service Provider Selection Service providers should be selected through a competitive request for proposal process. The Request for Proposal (RFP) process assures that operators and programs are responsive to workforce development needs in each area.

The RFP process is managed by each WDB. The RFP process is generally conducted every year but the period of time between the RFP process may be extended. Agreements/contracts with the selected providers will be renewed annually during that agreement/contract period based on available funding and successful program performance.

Following the distribution of funds by CTDOL the WDB’s will select providers and funding for Youth, Adult and Dislocated Workers. II. Provider Agreements The RFP process will allow for provider agreements with single providers or multiple co-contracting providers. In the case of multiple co-contracting providers, the division of awarded funds is determined by the co-contracting providers through a negotiation process. The negotiation process should take into account the scope of service and proposed program operating plan; including the planned activities, planned enrollments and estimated costs of career and training services to be delivered.

Co-contracting service providers may choose to negotiate a different split of funds with each contract renewal to reflect changes in service delivery; or maintain the same split as the previous contract.

ASSURANCES AND CERTIFICATIONS

As recipients of WIOA Title IB adult, youth, and dislocated worker funds, service providers must obtain and have posted the following certifications and assurances.

All recipients of WIOA Title IB funds including service providers, eligible training providers, on-the-job training and work experience worksites and participants are made aware of the certifications and assurances. Facsimile of certifications and assurances are included in this policy.

All grants, Memoranda of Understanding or Agreement, provider agreements or any other formal contract paid in full or in part with WIOA Title IB funds must contain the following assurances or, at a minimum must be referenced.

A. Certification Regarding Lobbying

As the duly authorized representative, the Grantee certifies 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 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, and 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 Form to Report Lobbying,” in accordance with its instructions.

3. The Grantee shall require that the language of this certification be included in the award documents for all sub awards at all tiers (including subcontracts, provider agreements, and contracts under grants, loans, and cooperative agreements) and that all s 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.C. Any person who fails to file the required certification shall be subject to a civil penalty of not less that $10,000 and not more than $100,000 for each such failure.

B. Certification Regarding Drug-Free Workplace Requirements

As the duly authorized representative, the grantee certifies that it will provide a drug-free workplace by:

1. Publishing a statement, signed by the authorized authority, notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee’s workplace and specifying the actions that will be taken against employees for violations of such prohibition; 2 Establishing an ongoing drug-free awareness program to inform employees about: a. The dangers of drug abuse in the workplace; b. The grantee’s policy of maintaining a drug-free workplace; c. Any available drug counseling, rehabilitation, and employee assistance programs; and d. Penalties that may be imposed upon employees for drug abuse violations occurring in the workplace. 3. Making it a requirement that each employee engaged in or that plans to engage in the performance of WIOA federally funded grants be given a copy of the statement required by paragraph (1); 4. Notifying the employee in the statement required by paragraph (1) that, as a condition of employment under the grant, the employee will: a. Abide by the terms of the statement;
and b. Notify the employer in writing of his or her conviction for violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction. 5. Notifying the Bureau in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant; 6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is convicted: a. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency; 7. Ensure that all recipients of WIOA Title IB funds including participants, service and training providers provide notification that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited at service and training provider sites and specify the actions that will be taken against employees for violations of such prohibition; 8. Making a good faith effort that the Grantee and provider worksites maintain a drug-free workplace through implementation of paragraphs (1)-(7).

C. Nondiscrimination and Equal Opportunity Assurance As the duly authorized representative the Grantee assures that it will comply fully with the nondiscrimination and equal opportunity provisions of the following laws: a. WIOA Equal Opportunity and Nondiscrimination Regulations 29 CFR Part 37 and Section 188 of the Workforce Innovation and Opportunity Act of 2014 which prohibits discrimination against all individuals in the United States on the basis of race, color, religion, sex, national origin, age, disability, political affiliation, or belief, and against beneficiaries on the basis of either citizenship/status as a lawfully admitted immigrant authorized to work in the United States or participation in any WIOA Title IB financially assisted program or activity; b. Title VI of the Civil Rights Act of 1964, as amended, which prohibits discrimination on the basis of race, color, and national origin; c. Section 504 of the Rehabilitation Act of 1973, as amended, which prohibits discrimination against qualified individuals with disabilities; d. The Age Discrimination Act of 1975, as amended, which prohibits discrimination on the basis of age; e. Title IX of the Education Amendments of 1972, as amended, which prohibits discrimination on the basis of sex in educational programs; and f. The Connecticut Human Rights Act.

This assurance applies to the Grantee’s operation of the WIOA Title IB financially assisted program or activity, and to all agreements the Grantee makes to carry out the WIOA Title IB financially assisted program or activity. The Grantee understands that the Grantor (Statewide Workforce Programs and Oversight Bureau) has the right to seek judicial enforcement of this assurance.

D. Certification Regarding Debarment, Suspension, and Other Responsibility Matters As the duly authorized representative the Grantee certifies to the best of its knowledge and belief, that it and its principals: 1. Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transaction by any Federal department or agency; 2. Have not within a three-year period preceding this proposal been convicted or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property. 3. Are not presently indicted or otherwise criminally or civilly charged by a government
entity (Federal, State or local) with commission of any of the offenses enumerated in certification; and 4. Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.

E. Assurances – Non-Construction Programs As the duly authorized representative the Grantee certifies that this agency: 1. Has the legal authority and the institutional managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of WIOA Title IB programs. 2. Will give the Comptroller General of the United States and the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to WIOA Title IB programs; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives. 3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain. 4. Will initiate and complete work relating to financial and management information system reporting requirements within acceptable times frames. 5. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) all other laws incorporated into or referenced in the Workforce Innovation and Opportunity Act of 2014, including, Title VI of the Civil Rights Act as amended; (b) Title IX of the Education Amendments of 1972, as amended; (c) Section 504 of the Rehabilitation Act as amended; (d) the Age Discrimination Act of 1975, as amended; (e) the Drug Abuse Office and Treatment Act of 1972 (PL 91-616) as amended; (f) Sections 523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. 290 DD.3 AND 290 EE.3) as amended, relating to confidentiality of alcohol and drug abuse patient records; (g) Title VIII of the Civil Rights Act of 1968 as amended; (h) Military Selective Service Act; (i) Nontraditional Employment for Women Act; and (j) Department of Labor Federal Regulations at 29 CFR Parts 34 and 1604. 6. Will comply with OMB Uniform Guidance 2 CFR Part 200.333 regarding the retention of records; 7. Will certify if requested, in accordance with 29 CFR Part 98, Section 98.510, that neither it nor its one-stop operators, service providers or training providers are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency. 8. Will comply as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. 276a. to 276a. 7), the Copeland Act (40 U.S.C. 276c. and 18 U.S.C. 874, and the Contract Work Hours and Safety Standards Act (40.327-333), regarding labor standards for federally assisted construction sub-agreements. 9. Will comply with the provisions of the Hatch Act (U.S.C. 1501-1508 and 7324-7328), which limit political activities of employees whose principal employment activities are funded in whole or in part with Federal funds. 10. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, Audits of States, Local Governments, and Non-Profit Organizations. 11. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations and policies governing WIOA Title IB programs.

PROVIDING NOTICE OF EQUAL OPPORTUNITY AND NONDISCRIMINATION

A. Prohibited Discrimination No individual in the United States may be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any Title I financially assisted program or activity, on the ground of race, color, religion, sex, national origin, age, disability, or political affiliation or belief and for beneficiaries only, citizenship or participation in any WIOA Title I program. WIOA Sec. 188 and 29 CFR Part 37.5

B. Providing Initial and Continuing Notice 1. All recipients receiving financial assistance under Workforce Investment Act Title I (excluding the beneficiaries of WIOA programs or activities) must provide initial and continuing notice that it does not discriminate on any prohibited ground. 2.
Recipients for the purpose of equal opportunity and nondiscrimination regulations include, but are not limited to: a. State level agencies that administer, or are financed in whole or in part by WIOA Title I funds; b. State Employment Security Agencies; c. State Workforce Investment Boards; d. WIOA grant recipients such as service providers and eligible training providers; e. One-stop operators; and f. One-stop partners (by inclusion in one-stop centers) 3. Notice must be provided to: a. Registrants/applicants and eligible applicants/registrants; b. Participants; c. Applicants for employment and employees in WIOA funded programs; d. Unions or professional organizations that hold collective bargaining or professional agreements with the recipient; and e. Members of the public, including those with impaired vision, hearing or Limited English Proficiency. Recipients must take appropriate steps to ensure that communications with individuals with disabilities are as effective as communications with others. WIOA Sec. 188; 29 CFR Part 37 and 20 CFR 667.600 4. “Equal Opportunity is the Law” Poster The posters, which are printed in English and Spanish, must be posted in prominent areas of the agency to provide notice of equal opportunity and nondiscrimination. Note: “Equal Opportunity is the Law” posters may be ordered from the Statewide Workforce Programs and Oversight Bureau. 5. “Equal Opportunity is the Law” Signature Form (WIOA-41 03/01) a. All individuals registered in WIOAs should read, understand and sign the complaint procedure signature form with a copy to the individual and a copy in their file. b. Service providers are required to provide the complaint procedure signature form to all current employees (WIOA partially or fully funded positions) and ensure that all new employees receive this form when they begin employment (again WIOA partially or fully-funded positions). All employees should read, understand and sign the complaint procedure form. Furnish a copy to the employee and place a copy in their personnel file. c. Applicants for WIOA services or applicants for employment with the recipient are covered by the appropriate display of posters. d. The new complaint signature forms are printed in English only. This office will have a Spanish version that can be duplicated for service providers in an area that has a substantial number of participants that would require notification in that language. e. Orientation presentations to new participants, new employees and/or the general public to its WIOA Title I financially funded program must include a discussion of rights under the nondiscrimination and equal opportunity provisions of the Workforce Investment Act. C. Publications Recipients of Workforce Investment Act funds must provide notice that WIOA Title I financially assisted programs or activities are an “equal opportunity employer/program” and that “auxiliary aids and services are available upon request to individuals with disabilities” in recruitment brochures and other materials that are ordinarily distributed or communicated in written and/or oral form, electronically and/or on paper, to staff, clients, or the public at large, to describe programs financially funded through WIOA Title I. Recipients that publish or broadcast WIOA Title I program information on news media must ensure that such publications and broadcasts state that the program or activity is an equal opportunity employer/program (or otherwise indicate that discrimination in the WIOA Title I financially assisted program or activity is prohibited by Federal law) and indicate that auxiliary aids and services are available upon request to individuals with disabilities. Where materials indicate that the recipient may be reached by telephone, the materials must state the telephone number of the TTY or relay services used by the recipients. 29 CFR Part 37.34 D. Notification of Grievance Due Process All WIOA Title IB and National Emergency Grant participants must be provided information about their right to file a grievance within one year of the alleged occurrence and the opportunity for an informal resolution that may include a hearing within sixty days of filing the grievance. Verification of notification must be included in all adult, youth and dislocated worker program participant files. The grievance notice is on the ISS or IEP Participant Agreement. WIOA Regs. at 20 CFR Part 683.600

REPORTING
Service providers must submit quarterly program and expenditures for the adult, youth, dislocated worker, State Displaced Homemaker and one-stop operator programs for provider agreement. NOTE: Dislocated Worker National Emergency Grants (NEG) will continue to provide monthly reports.

Quarterly Reports 1. Program Narrative The program narrative report tracks the progress of the goals as listed on the Scope of Services in the Provider Agreement. The narrative should address difficulties, successes and accomplishments in meeting goals, and point out areas for technical assistance.

Adult, youth and dislocated worker and State Displaced Homemaker program managers will review program narratives as part of the program management process during the grant year. Information gained will be used to provide technical assistance and training to individual providers, providers in a region, and for area and statewide training sessions.

2. Program Narrative Format a. Service Provider b. Program c. Report for quarter ending d. Discussion of activities, outreach, etc. (based on Scope of Services) and coordination with One Stop Operators, Community Management Teams and others e. Data entry issues f. Expenditures and enrollments planned versus actual at quarter end. Deficiencies explained. g. What works? h. What does not work? i. Technical Assistance/Training needed.

3. Timeline for Submitting Reports Quarterly program and expenditure reports are due by 5:00 p.m. on the twenty-fifth (25) calendar day of the first month after the quarter end date. Quarter end dates are March 31, June 30, September 30, and December 31.

FUNDING ALLOCATION

WIOA Adult and WIOA Youth Connecticut’s procedure for equitably allocating resources across the State utilizes the federal formula. This ensures that resources are distributed in a fair and equitable manner. Connecticut’s Procedure is as follows:

Connecticut has five local Workforce Development Areas. WIOA funding is allocated to Adult and Youth by area based on the following formula:

• 1/3 unemployed in the Areas of Substantial Unemployment (ASU – a contiguous area with an average unemployment rate of 6.5% or greater); • 1/3 excess unemployed greater than 4.5 percent. • 1/3 total number of individuals in Connecticut who are economically disadvantaged

For Certified Dislocated Workers CTDOL uses the CTDOL Department of Research labor market information to determine formulas and award allocations.

• Total Insured Unemployed 5% • Declining Industries 5% • Long Term Unemployed 25% • Plant Closings/Mass Layoffs 30% • Total Unemployment Concentration 35%

Each data element is weighted as indicated in the above percentages. Percentages remain set unless changed by the CETC.

TRANSFER AUTHORITY
A local board may transfer, if such a transfer is approved by the Governor, up to and including 100 percent of the funds allocated to the local area under WIOA paragraph (2)(A) or (3), and up to and including 100 percent of the funds allocated to the local area under paragraph (2)(B), for a fiscal year between—

(A) adult employment and training activities; and (B) dislocated worker employment and training activities.

This policy provides the procedures for the transfer of funds between adult and dislocated worker programs at the local area. The Connecticut Department of Labor, in governing the transfer of funds, will use the following procedure. 1. The attached transfer of funds request package must be submitted for each request for transfer of funds. All parts must be completed. 2. A transfer of funds request may be submitted for consideration at any time during the life of a particular year’s allocation, as stipulated in the contract.

Once the funds are transferred, they are available for expenditure in the receiving funding stream and are subject to all corresponding rules, regulations, and procedures.

The transfer for funds request must satisfactorily address all supplemental questions contained in the package. 5. As part of the supplemental requirements, local areas must provide for a minimum 15-day period of comment to the public and area stakeholders before a request is submitted. This can be done through publication of the request in local area newspaper(s).

The Connecticut Department of Labor shall approve or disapprove a local area request for transfer within thirty (30) days of receipt of the request and all necessary supporting information, including any inquiry or request for additional information or clarification.

Expenditures shall be reported in accordance with CT Department of Labor Memorandum with AP 00-03. Questions regarding this policy may be directed to Michelle Costello at 860.263.6592.

OVERVIEW

I. Overview The Workforce Innovations and Opportunities Act of 2014 (WIOA) retains the comprehensive workforce development system known as the One Stop System. The One Stop System is intended to be customer-focused, to help Americans access the tools they need to manage their careers through information and high quality services, and help business find skilled workers.

A. One Stop System Goal To increase the employment, retention, and earnings of participants, and increase occupational skill attainment by participants, and, as a result, improve the quality of the workforce, reduce welfare dependency and enhance the productivity and competitiveness of the Nation.

B. Seven Principles of One Stop Service Delivery 1. Streamlining services through better integration. 2. Empowering individuals. 3. Offering universal access. 4. Increasing accountability. 5. Creating a role for the private sector. 6. Providing flexibility from State partners. 7. Improving youth programs.

C. The Workforce Innovations and Opportunities Act Includes Five Titles Title I Workforce Development Activities Title II Adult Education and Literacy Title III Amendments to the Wagner-Peyser Act Title IV Amendments to the Rehabilitation Act of 1973 Title V General Provisions
II. The One Stop Operator

The One Stop Operator is the first consideration regarding One Stop definitions. The Operator is the driving force in the workforce system.

A. Role of the One Stop Operator

The One Stop Operator is responsible for general operation of the One Stop Center as required in (Sections 121(e)(2)(A)) of WIOA law.

Overall operation of the One Stop Center includes entering into agreements with the partners collocated in the center; cost allocation plan(s); service mix and flow; planning and monitoring center operations; and coordination with other service providers in the service area.

The One Stop Operator is also responsible for developing a strategic operations or business plan for the center including the development of a common mission and goals for center operation and continuous improvement. The One Stop Operator should ensure that the center is guided by customer needs, customer satisfaction and customer success. The plan should include strategies for training of center staff to insure integration of service delivery to provide seamless access to services for all customers.

The One Stop Operator must ensure that the core services specified in WIOA Section 121(e)(2) are provided and provide access to the other activities and programs provided under WIOA and by the mandatory partner programs available in the area. The One Stop Operator must ensure that the One Stop Center and services are accessible to all customers including individuals with disabilities.

B. One Stop Center

Within each workforce development area there must be at least one designated One Stop Center. Section 121(b)(1)(B)(i-xiii) of the Act lists the federally funded program partners that must provide access to core services and participate in the creation and maintenance of One Stop Centers and systems.

III. Seamless Service Delivery

One Stop is often described as a “seamless” system of service delivery, i.e. that information and access to services are available to the customer regardless of the site of original contact. This is accomplished by collaboration of entities responsible for separate workforce development funding streams and by integration of programs and resources at the community level. All partners have an obligation to provide the core informational services so that individuals may access the One Stop System regardless where they enter, including information regarding access or linkages to intensive services, training services and the programs and activities carried out by One Stop partners.

IV. One-Stop Certification Process

One-Stop Systems play an integral role within the Workforce Innovation and Opportunities Act’s vision for statewide workforce development. The State Board, in an effort to align with federal strategies, will ensure consistency and the flexibility to create a statewide system with direct input from local communities and designed to meet local needs. The State Board has developed the general system criteria required for One-Stop Certification, and will be responsible for the certification of One-Stops. The State Board will also provide technical assistance and guidance to the maximum extent possible, in order to promote and expand the development of the One-Stop System in Connecticut.

A. Business Plan

Local entities requesting certification will submit a business plan through their Community Management Team (CMT) to the State Board. The State Board will establish standard criteria acceptable for acceptance and approval. The State Board must take action on the business plan within 90 days of submittal by the CMT, and notify the CMT in writing of the Board’s determination.
If a business plan is denied, the Board must notify the CMT in writing, within the 90-day period, as to the reason(s) for denial, and provide a process improvement plan to assist the CMT with meeting the criteria for approval of the business plan. A CMT may submit a revised plan to the State Board at any time, which will re-initiate the process. The Board will establish an appeal process for denial of application.

B. On-Site Review Once a business plan is approved, the State Board will conduct a site review within 60 days of the date the business plan was approved. The review will be conducted using the proposed business plan, and additional standardized criteria established/developed by the State Board, to include on-site monitoring, telephone or email interviews with site and partner staff, and other materials and information as approved. The Board will notify the CMT in writing within 30 days of the site review as to the determination of certification.

If the determination is favorable, the CMT will be awarded a certified status, and be provided the re-certification criteria. If the determination is not favorable, the CMT will be provided a corrective action plan along with the written determination, and afforded technical support and guidance from the State Board to assist with a second review. Within 60 days of receipt of a written response from the CMT addressing the issues of concern and requesting re-consideration, the State Board will conduct a site review and the site-review process will be reinitiated. The State Board will establish an appeal process for denial of application.

C. Re-Certification Once a One-Stop is certified, every two years thereafter the State Board will conduct a re-certification, including an on-site review. In order to be re-certified, the One-Stop must meet the initial certification criteria. The State Board will establish an appeal process for denial of application.

D. Delegation of On-Site Reviews If the State Board elects to designate their administrative entity to conduct the on-site review of One-Stops, the State Board is responsible for ensuring the above process is adhered to, and that they receive reports of One-Stop certification activities at each State Board meeting.

E. Appeals Process The State Board is responsible for addressing issues that arise as a result of certification denial, or with the established appeals process. The State Board will work to implement a formal Appeals Process for incorporation into the One-Stop Process.

V. Connecticut One-Stop Certification Criteria In order to be considered for certification as a local Workforce Innovation and Opportunities Act (WIOA) One-Stop System, the Local Community Management Team (CMT) must submit a Business Plan to the State Board for approval.

In addition, at least 80 % of the following criteria must be met, and a plan must be in place to meet the remaining 20 % within one (1) year of the date of certification.

At a minimum, a One-Stop system must provide the core services specified in WIOA section 121(d)(2), and must provide access to other programs and activities carried out by the One-Stop partners. Additional partners may be required under the Act or the Business Plan, or voluntarily incorporated.

Co-location of programs is encouraged to the extent possible. Once a site is established, the site must utilize the term “One-Stop” as the common identifier. When selecting the site location, consideration must be given to customer accessibility.
A written agreement must detail management of the One-Stop and is to be reviewed, and if necessary revised, upon a change in key staff. Co-located partners must have a written agreement or Operating Plan describing roles and responsibilities of each partner at the site. For those who are collaborating partners off-site, roles and responsibilities will be defined in an addendum to the co-located partner agreement.

All collaborating partners, those on and off site, must have the appropriate staff trained in the services provided by other partners, know who the contact person for each partner is, and can seamlessly refer clients or participants to the appropriate entity within each partner program.

Hoteling space must be made available at the site for visiting partner programs whenever feasible.

All partners, those on and off site, must have a resource area available to customers that is staffed, has information on all partners in the local system, and meets customer needs.

The site used for co-location must be accessible for those with disabilities and those who speak languages other than English.

GENERAL ELIGIBILITY DETERMINATION PROCESS CTHires Virtual One Stop is the data entry system used to maintain and track all services provided through the funding programs in this Manual.

The Workforce Innovation and Opportunity Act (WIOA), Section 2 Purposes, number (6) indicates “For purposes of subtitle A and B of title 1, to provide workforce investment activities through statewide and local workforce development systems, that increase the employment, retention, and earnings of participants, and increase attainment of recognized postsecondary credentials by participants, and as a result, improve the quality of the workforce, reduce welfare dependency, increase economic self-sufficiency, meet the skill requirements of employers, and enhance the productivity and competitiveness of the Nation.”

WIOA legislation addresses an important distinction between registration and participation – two separate actions in the process. Individuals who are primarily seeking information are not treated as participants and their self-service or information search requires no registration. When an individual seeks more than minimal assistance from staff in taking the next step towards self-sufficient employment, the person must be registered and eligibility must be determined. Registration is defined as the point at which information that is used in performance begins to be collected. Registration is the process for collecting information to support a determination of eligibility. This information may be collected through methods that include electronic data transfer, personal interview, or an individual’s application. In the CTHires system Registration occurs as the client/staff complete the WIOA Wizard portion of the application. Participation is the point at which the individual has been determined eligible for program services and has received or is receiving a WIOA service, such as career services other than self-service or informational service and is the point at which an individual is to be included in performance calculations for the primary indicators of performance. Participation occurs after the registration process of collecting information to support an eligibility determination and begins when the individual receives a staff-assisted WIOA service, which does not include self-service or informational activities. In the CTHires system participation occurs when the staff initiates the create participation portion of the application. The application process requires evidence of all necessary eligibility documentation regarding citizenship, age, income (for youth and adults) and selective service registration (if applicable). All documentation necessary to establish eligibility for the WIOA program must be collected and reviewed within 30 days of the application.
CTHires program rules will not allow participation to be created after the 30th day. WIOA Sec. 188.(a)

§ 680.110 When must adults and dislocated workers be registered and considered a participant? (a) Registration is the process for collecting information to support a determination of eligibility. This information may be collected through methods that include electronic data transfer, personal interview, or an individual's application. Individuals are considered participants when they have received a Workforce Innovation and Opportunity Act of 2014 (WIOA) service other than self-service or information-only activities and have satisfied all applicable programmatic requirements for the provision of services, such as eligibility determination (see § 677.150(a) of this chapter).

(b) Adults and dislocated workers who receive services funded under title I other than self-service or information-only activities must be registered and must be a participant.

(c) EO data, as defined in § 675.300 of this chapter, must be collected on every individual who is interested in being considered for WIOA title I financially assisted aid, benefits, services, or training by a recipient, and who has signified that interest by submitting personal information in response to a request from the grant recipient or designated service provider.

The CTHires system requires activity commencement with participation.

C. Referral Service providers shall provide information to eligible applicants, whether enrolled in WIOA or not, of the services available through WIOA service providers, including information regarding the opportunities for nontraditional training and employment. Determination may be made prior to enrollment in WIOA to refer an eligible applicant to another service agency or training and education program deemed more suitable for the individual. Each service provider shall ensure that an eligible applicant who cannot be served by its particular program is referred to appropriate agencies, both within and outside the WIOA system that may be able to better serve the applicant.

D. Confidentiality and Release of Information State and federal privacy laws safeguard an individual's privacy from the misuse of federal and state records and provide individuals access to their records. Providers must maintain participant and applicant files in a manner to safeguard confidentiality.

Funding source agencies have access to participant files. Access to files should be granted on a "need to know" basis. If other agencies, prospective employers, or other individuals or agencies request access to information in a file, an authorization of release for the information must be obtained from the participant. A "Sample Authorization of Release Form" facsimile is shown in the forms section of this manual. The sample form may be used as an Authorization form with the agency's name inserted on the form. Participants should sign the form only after all information is complete.

Access to the records from other agencies may also require authorization for release of information.

ADULT AND DISLOCATED WORKER ELIGIBILITY AND SERVICE PRIORITY

I. General Eligibility Requirements § 680.130 A. To receive Title I B Adult or Dislocated Worker individualized career and training services, an individual must: 1. Be a U.S. Citizen or Registered Alien; and 2. Meet Selective Service Registration requirements, if applicable. B. Additional Eligibility
Requirements for Adults

1. Individuals must be 18 years of age or older and
2. Meet the service priority required for adults (e.g., low-income and public assistance recipients).

C. Additional Eligibility Requirements for Dislocated Workers

An individual must meet the WIOA definition of a dislocated worker or displaced homemaker definition as found in Part III of this Section and the Glossary of Terms and Definitions.

§ 680.130 What are the eligibility criteria for career services for dislocated workers in the adult and dislocated worker programs?

(a) To be eligible to receive career services as a dislocated worker in the adult and dislocated worker programs, an individual must meet the definition of “dislocated worker” at WIOA sec. 3(15). Eligibility criteria for training services are found at § 680.210. (b) Governors and Local Workforce Development Boards (WDBs) may establish policies and procedures for one-stop centers to use in determining an individual’s eligibility as a dislocated worker, consistent with the definition at WIOA sec. 3(15). These policies and procedures may address such conditions as:

(1) What constitutes a “general announcement” of plant closing under WIOA sec. 3(15)(B)(ii) or (iii);
(2) What constitutes “unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters” for determining the eligibility of self-employed individuals, including family members and farm workers or ranch hands, under WIOA sec. 3(15)(C); and
(3) What constitutes “unlikely to return to a previous industry or occupation” under WIOA sec. 3(15)(A)(iii), consistent with § 680.660.

§ 680.140 What Workforce Innovation and Opportunity Act title I adult and dislocated worker services are Local Workforce Development Boards required and permitted to provide?

(a) WIOA title I formula funds allocated to local areas for adults and dislocated workers must be used to provide career and training services through the one-stop delivery system. Local WDBs determine the most appropriate mix of these services, but both types must be available for eligible adults and dislocated workers. Different eligibility criteria apply for each type of services. See §§ 680.120, 680.130, and 680.210.

(b) WIOA title I funds also may be used to provide the additional services described in WIOA sec. 134(d), including:
(1) Job seeker services, such as:
   (i) Customer support to enable individuals with barriers to employment (including individuals with disabilities) and veterans, to navigate among multiple services and activities;
   (ii) Training programs for displaced homemakers and for individuals training for nontraditional employment (as defined in WIOA sec. 3(37) as occupations or fields of work in which individuals of one gender comprise less than 25 percent of the individuals so employed), in conjunction with programs operated in the local area;
   (iii) Work support activities for low-wage workers, in coordination with one-stop partners, which will provide opportunities for these workers to retain or enhance employment. These activities may include any activities available under the WIOA adult and dislocated worker programs in coordination with activities and resources available through partner programs. These activities may be provided in a manner that enhances the worker’s ability to participate, for example by providing them at nontraditional hours or providing on-site child care;
   (iv) Supportive services, including needs-related payments, as described in subpart G of this part; and

(v) Transitional jobs, as described in § 680.190, to individuals with barriers to employment who are chronically unemployed or have an inconsistent work history;
(2) Employer services, such as: (i) Customized screening and referral of qualified participants in training services to employers; (ii) Customized employment-related services to employers, employer associations, or other such organization on a fee-for-service basis that are in addition to labor exchange services available to employers under the Wagner-Peyser Act Employment Service; (iii) Activities to provide business services and strategies that meet the workforce investment needs of area employers, as determined by the Local WDB and consistent with the local plan (see § 678.435 of this chapter and WIOA sec. 134(d)(1)(A)(ix)); and

(3) Coordination activities, such as:

(i) Employment and training activities in coordination with child support enforcement activities, as well as child support services and assistance activities, of the State and local agencies carrying out part D of title IV of the Social Security Act (42 U.S.C. 651 et seq.); (ii) Employment and training activities in coordination with cooperative extension programs carried out by the Department of Agriculture; (iii) Employment and training activities in coordination with activities to facilitate remote access to services provided through a one-stop delivery system, including facilitating access through the use of technology; (iv) Improving coordination between workforce investment activities and economic development activities carried out within the local area involved, and to promote entrepreneurial skills training and microenterprise services; (v) Improving services and linkages between the local workforce development system (including the local one-stop delivery system) and employers, including small employers, in the local area; (vi) Strengthening linkages between the one-stop delivery system and the unemployment insurance programs; and (vii) Improving coordination between employment and training activities and programs carried out in the local area for individuals with disabilities, including programs carried out by State agencies relating to intellectual disabilities and developmental disabilities, activities carried out by Statewide Independent Living Councils established under sec. 705 of the Rehabilitation Act of 1973 (29 U.S.C. 796d), programs funded under part B of chapter 1 of title VII of such Act (29 U.S.C. 796e et seq.), and activities carried out by centers for independent living, as defined in sec. 702 of such Act (29 U.S.C. 796a).

(4) Implementing a Pay-for-Performance contract strategy for training services in accordance with §§ 683.500 through 683.530 of this chapter for which up to 10 percent of the Local WDB’s total adult and dislocated worker funds may be used.

(5) Technical assistance for one-stop centers, partners, and eligible training providers (ETPs) on the provision of service to individuals with disabilities in local areas, including staff training and development, provision of outreach and intake assessments, service delivery, service coordination across providers and programs, and development of performance accountability measures.

(6) Activities to adjust the economic self-sufficiency standards referred to in WIOA sec. 134(a)(3)(A)(xii) for local factors or activities to adopt, calculate or commission for approval, economic self-sufficiency standards for the local areas that specify the income needs of families, by family size, the number and ages of children in the family, and sub-State geographical considerations.

(7) Implementing promising service to workers and businesses, which may include support for education, training, skill upgrading, and statewide networking for employees to become workplace learning advisors and maintain proficiency in carrying out the activities associated with such advising.
§ 680.150 What career services must be provided to adults and dislocated workers? (a) At a minimum, all of the basic career services described in WIOA secs. 134(c)(2)(A)(i)-(xi) and § 678.430(a) of this chapter must be provided in each local area through the one-stop delivery system. (b) Individualized career services described in WIOA sec. 134(c)(2)(A)(xii) and § 678.430(b) of this chapter must be made available, if determined appropriate in order for an individual to obtain or retain employment. (c) Follow-up services, as described in WIOA sec. 134(c)(2)(A)(xiii) and § 678.430(c) of this chapter, must be made available, as determined appropriate by the Local WDB, for a minimum of 12 months following the first day of employment, to participants who are placed in unsubsidized employment.

§ 680.160 How are career services delivered? Career services must be provided through the one-stop delivery system. Career services may be provided directly by the one-stop operator or through contracts with service providers that are approved by the Local WDB. The Local WDB only may be a provider of career services when approved by the chief elected official and the Governor in accordance with the requirements of WIOA sec. 107(g)(2) and § 679.410 of this chapter.

II. Service Priority For WIOA Adults (WIOA Law Section 134(c)(3)(E)) § 680.600 Career services are universally available to all individuals entering a one-stop system facility. However, covered persons (veterans and eligible spouses of veterans) are given priority of service over non-covered persons.

A. Adult Service Priority

1. Priority for individualized career and training services shall be given to recipients of public assistance; low-income; and individuals who are basic skills deficient, consistent with the Workforce Innovation and Opportunity Act. WIOA defines a Low-Income individual as an individual who: (a) Receives, or in the past six (6) months has received, or is a member of a family that receives, or in the past six (6) months has received assistance through: (1) SNAP in accordance with the Food and Nutrition Act of 2008; or (2) TANF under Part A of Title IV of the Social Security Act; or (3) SSI (supplemental security income) established under Title XVI of the of the Social Security Act; or (4) State or local income-based public assistance. In Connecticut this is General Assistance (GA); Refugee Cash Assistance (RCA); and HUSKY Medical. (b) Received an income, or is a member of a family that received a total family income that did not exceed the higher of: (1) the poverty line; or (2) 70 percent of the lower living standard income level. Connecticut uses the 70 percent of the lower living standard income level to determine low-income. Refer to Section 3.70 Income/Family Size Determination for the Income Table for Adults and Youth and guidance on what income must be included and or income that may excluded in determining low-income. (c) Qualifies as a homeless individual as defined Section 41403(6) of the Violence Against Women Act of 1994; (d) is an individual with a disability whose own income meets the requirements of a program described in subparagraph b., but who is a member of a family whose income does not meet this requirement. § 680.640 WIOA Law Sec. 3 (36)

2. Individuals who are recipients of public assistance (TANF, SNAP, Supplemental Security Income (SSI), HUSKY, Refugee Cash Assistance (RCA), and General Assistance (GA) are considered to meet Categorical Income Eligibility and may be automatically income eligible and no further income verification is required if the individual has provided acceptable documentation. (a) (1) SNAP documentation must be current and verify that the individual receives or is a member of a household that is receiving SNAP benefits as described in 1. (a). Examples of documentation include the Letter of Award if the individual is the recipient, or documentation that lists the individual is a member of the household receiving SNAP, and documentation such as a SNAP benefit summary showing the dates to verify that benefits were received within the six-month period prior to application to a WIOA program. (2) HUSKY MEDICAL: Medicaid card must be in the applicant’s name. (b) Cash Public
Assistance: (1) TANF documentation must be current and verify that the individual is receiving or is a member of a family that is receiving TANF payments at the time of application to a WIOA program. Examples of acceptable documentation include the Letter of Award if the individual is the recipient, or documentation that lists the individual as a member of the family currently receiving TANF, and documentation such as the TANF benefit summary that shows the dates of the public assistance. (2) SSI, RCA and GA are payments made to a single recipient. The individual applying to WIOA must be the recipient at the time of application to a WIOA program in order to be considered as receiving public assistance and would be considered as a family of one. Examples of acceptable documentation include the Award Letter or other authorization notice to receive cash public assistance.

B. Dislocated Worker Priority for Individualized Career and Training Services
The Workforce Innovation and Opportunity Act does not provide a priority of service requirement for dislocated workers. However, plant closures or significant dislocation events are given priority for Individualized Career and Training services. All other eligible individuals impacted are considered of equal status for receipt of services notwithstanding federal requirements pertaining to priority for covered persons (veterans and eligible spouses).

C. Priority of Service for Covered Persons, also known as Veterans’ Priority of Service (P.L. 107-288 (Jobs for Veterans Act) and 20 CFR Part 1010) § 680.650§ 680.660 1. Veterans and eligible spouses of veterans (covered persons) are entitled to priority over non-covered persons for the receipt of employment, training, and placement services provided under new or existing USDOL-funded job training programs. See definition of Covered Persons in the glossary. 2. Veterans priority of service does NOT change a program’s intended functions; covered persons still need to meet all program eligibility requirements. 3. Priority of service applies to every qualified job training program funded, in whole or in part by USDOL including: a. Any such program or service that uses technology to assist individuals to access workforce development programs (such as job and training opportunities, labor market information, career assessment tools, and related support services); b. Any such program or service under the public employment service system, One-Stop Career Centers, the Workforce Innovation and Opportunity Act of 2014, a demonstration or other temporary program; and b. Any workforce development program targeted to specific groups, and those programs implemented by States or local service providers based on Federal block grants administered USDOL.

4. Service Providers must ensure a process for identifying covered persons at the point of entry including enrollment into workforce services, to allow covered persons to take full advantage of priority of service. Identification does not mean verification of veteran status. Self-identified veterans must be made aware of: a. Their entitlement to priority of service; b. The full array of employment, training, and placement services available under priority of service; and c. Any applicable eligibility requirements for those programs and/or services.

III. Dislocated Worker Eligibility Criteria
A dislocated worker, for the purposes of the Title I of the Workforce Innovation and Opportunity Act, is an individual who: A. (i) has been terminated or laid off from their job, or who received a notice of termination or layoff, from their employer;* (ii) (I) is eligible for or has exhausted their unemployment payments; or (II) has been employed for a duration sufficient to demonstrate attachment to the workforce, but cannot get unemployment compensation because of low earnings or having done work for an employer not covered under a State unemployment compensation law; and (iii) is unlikely to return to a previous industry or occupation; ** B. (i) has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility or enterprise; (ii) is employed at a facility which the employer has made a general announcement that such facility will close within 180 days; or (iii) for purpose of eligibility to receive services other than
training services, intensive services or supportive services, is employed at a facility at which the employer has made a general announcement that such facility will close; C. was self-employed (including employment as a farmer, rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters; or D. is a displaced homemaker (must meet the dislocated worker definition of a displaced homemaker). E. (i) is the spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of title 10, United States Code), and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member; or (ii) is the spouse of a member of the Armed Forces on active duty and who meets the criteria described in paragraph (16)(B). WIOA Sec. 3(15)

DISPLACED HOMEMAKER.—The term “displaced homemaker” means an individual who has been providing unpaid services to family members in the home and who—(A)(i) has been dependent on the income of another family member but is no longer supported by that income; or (ii) is the dependent spouse of a member of the Armed Forces on active duty (as defined in Section 101(d)(1) of title 10, United States Code) and whose family income is significantly reduced because of a deployment (as defined in Section 991(b) of title 10, United States Code, or pursuant to paragraph (4) of such section), a call or order to active duty pursuant to a provision of law referred to in Section 101(a)(13)(B) of title 10, United States Code, a permanent change of station, or the service-connected (as defined in Section 101(16) of title 38, United States Code) death or disability of the member; and (B) is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment. WIOA Sec. 3(16)(B)

*Separating military service members (non-retiree) and military spouses may be enrolled for services as dislocated workers if they meet the definitions set forth in TEGL 22-04 Section 4.

Recently separated veterans and transitioning service members are considered to have received a notice of termination or layoff from their employer (DD-214) per III.A.(i) of this Section. For full definitions of Recently Separated Veteran and Transitioning Service Member see the Glossary of Terms and Definitions on DLI’s WIOA website.

**Connecticut’s UI profiling and referral process satisfies the criteria necessary to meet category A. of the dislocated worker definition. Claimants who have been referred from the Unemployment Insurance Division through Worker Profiling, REA/RES, EUC REA and REA Pilot meet the definition. In such cases, documentation of the referral is sufficient to establish dislocated worker eligibility. 20 CFR Part 663. Introduction Subpart A.2. Registration and Eligibility

§ 680.610 Does the statutory priority for use of adult funds also apply to dislocated worker funds? No, the statutory priority only applies to adult funds and only applies to providing individualized career services, as described in § 680.150(b), and training services. Funds allocated for dislocated workers are not subject to this requirement.

IV. Eligibility Verification Verification of eligibility is used to ensure the reliability of the participant information system, to guarantee services are provided to persons most in need, and to avoid potential disallowed costs. Once an applicant is determined to be eligible, verification of eligibility must be completed. CTHires allows for the verification of each required element. Documentation may be uploaded or scanned to the VOS system. If verification is not contained in the CTHires system it must be in the participant’s case file. No individualized career services may be provided until the participant has furnished proof of eligibility to the enrolling agency.
The primary responsibility for providing documentary evidence rests with the applicant/potential participant. Copies of all documentary evidence must be maintained in the participant’s file or the CTHires system. For those ex-service members without a DD-214, service providers should work with local or State veterans’ staff to obtain a copy. The lack of a DD-214 cannot be used to deny services; it is the responsibility of the provider – in concert with the individual – to obtain a DD-214 in the absence of other allowable documentation.

If an applicant is unable to produce the necessary documents to prove eligibility, service providers have two options to determine eligibility. They can verify information given via telephone contact with an employer or by document inspection, or an applicant statement may be used (use is limited). However, service providers must ensure applicant statements and/or staff verification are allowable from the perspective of federal data validation requirements.

**YOUTH ELIGIBILITY AND SERVICE PRIORITY**

A. General Requirements In order to be considered eligible for the WIOA Title IB youth program an individual must be: 1. a U.S. Citizen or Registered Alien; 2. between the ages of 14 and 24 at the time of enrollment; and 3. must meet Selective Service Registration requirements. Note: Youth who become of age for Selective Service registration after enrollment must meet Selective Service requirements by, or within 30 days of, their 18th birthday. B. Eligibility Requirements Income Eligibility: With the exception of youth enrolled under the 5% low income exclusion and specific out-of-school youth barriers that do not require that youth be low-income all other youth must meet the WIOA definition of a low-income individual. WIOA defines a Low-Income individual as an individual who: (a) Receives, or in the past six (6) months has received, or is a member of a family that receives, or in the past six (6) months has received assistance through: (1) SNAP in accordance with the Food and Nutrition Act of 2008; or (2) TANF under Part A of Title IV of the Social Security Act; or (3) SSI (supplemental security income) established under Title XVI of the of the Social Security Act; or (4) State or local income-based public assistance. In Connecticut this is General Assistance (GA); Refugee Cash Assistance (RCA); and HUSKY Medical. (b) Received an income, or is a member of a family that received a total family income that did not exceed the higher of: (1) the poverty line; or (2) 70 percent of the lower living standard income level. Connecticut uses the 70 percent of the lower living standard income level to determine low-income. Refer to Section 3.70 Income/Family Size Determination for the Income Table for Adults and Youth and guidance on what income must be included and or income that may excluded in determining low-income. (c) Qualifies as a homeless individual as defined Section 41403(6) of the Violence Against Women Act of 1994; § 681.280 (d) is an individual with a disability whose own income meets the requirements of a program described in subparagraph b., but who is a member of a family whose income does not meet this requirement. WIOA Law Sec. 3 (36)

Individuals who are recipients of public assistance (TANF, SNAP, Supplemental Security Income (SSI), HUSKY Medical, Refugee Cash Assistance (RCA), and General Assistance (GA) are considered to meet Categorical Income Eligibility and may be automatically income eligible and no further income verification is required if the individual has provided acceptable documentation. (a) (1) SNAP documentation must be current and verify that the individual receives or is a member of a household that is receiving SNAP benefits as described in 1. (a). Examples of documentation include the Letter of Award if the individual is the recipient, or documentation that lists the individual is a member of the household receiving SNAP, and documentation such as a SNAP benefit summary showing the dates to verify that benefits were received within the six-month period prior to application to a WIOA program. (b) Cash Public Assistance: (1) TANF documentation must be current and verify that the individual is receiving or is a member of a family that is receiving TANF
payments at the time of application to a WIOA program. Examples of acceptable documentation include the Letter of Award if the individual is the recipient, or documentation that lists the individual as a member of the family currently receiving TANF, and documentation such as the TANF benefit summary that shows the dates of the public assistance. (2) SSI, RCA and GA are payments made to a single recipient. The individual applying to WIOA must be the recipient at the time of application to a WIOA program in order to be considered as receiving public assistance and would be considered as a family of one. Examples of acceptable documentation include the Award Letter or other authorization notice to receive cash public assistance. § 68 681.270 May a local program use eligibility for free or reduced price lunches under the National School Lunch Program as a substitute for the income eligibility criteria under title I of the Workforce Innovation and Opportunity Act?

Yes, WIOA sec. 3(36) defines a low-income individual to include an individual who receives (or is eligible to receive) a free or reduced price lunch under the Richard B. Russell Nationonal School Lunch Act.

§ 681.200 Eligible Youth: means an in-school youth or an out-of-school youth. WIOA Law Sec. 3(18) The Workforce Innovation and Opportunity Act of 2014 separates youth in to two separate categories: In-school youth ages 14-21; and out-of-school youth ages 16-24 at the time of enrollment. WIOA In-School Youth § 681.220 Eligible in-school youth must be: (a) Attending school, including secondary or post-secondary school. WIOA does not consider providers of Adult Education under WIOA Title II, YouthBuild programs, and Job Corps programs to be “schools”. ? A youth who is home-schooled may be considered in-school or out-of-school depending on whether or not the home-school is registered with the County Superintendent of Schools. WIOA youth providers should verify registration to determine the applicant’s school status. (b) Not younger than 14 (unless an individual with a disability who is attending school under State law) and not older than 21 at the time enrollment (age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 21 once they are enrolled in the program) and any one of the following categories; and (c) Low-income and is one or more of the following: 1. Basic Skills deficient; 2. An English Language Learner; 3. An offender; 4. A homeless individual which may include: ? runaway youth; ? youth in foster care or has aged out of the foster care system; ? youth eligible for assistance under Sec. 477 of the Social Security Act (Chafee Foster Care Independence Program); or ? youth in an out-of-home placement 5. Pregnant or parenting; 6. Individual with a disability; 7. An individual who requires additional assistance to: (a) complete an educational program: a youth who is at risk of dropping out of high school as documented by his/her school; or had previously dropped out of an educational program but has returned to school (including an alternative school); has below average grades; or a youth with poor attendance patterns in an educational program during the last 12 calendar months; or has previously been placed in out-of-home care (foster care, group home, or kinship care) for more than 6 months. OR (b) secure and hold employment: an in-school youth who has not held a job for more than three consecutive months; or has a poor work history to include no work history; or has been fired from a job in the last 6 calendar months; or lacks work readiness skills necessary to obtain and/or retain employment. ? Not more than 5% of the in-school youth may be assisted under the additional barrier. WIOA Law Sec. 129 (a)(C)(3)(B) ? Prior to enrollment using this barrier case managers must obtain availability approval from WIOA Youth Program Manager.

WIOA Out-Of-School (OSY) Youth § 681.210 The intent of WIOA is to serve more OSY who are disconnected from school and work. Out-of-school status is determined at the time of enrollment and once the youth is enrolled as an Out-Of-School Youth (OSY), that status continues for the duration of the youth’s enrollment, even if the youth later returns to school.
Out-of-school participation for reporting OSY expenditures: WIA enrollments: WIA out-of-school participants still enrolled in the WIA youth program as of June 30, 2015 are considered grandfathered into the WIOA youth program. This means that the school status of the youth enrolled in WIA remains the same under WIOA so if the youth was enrolled as out-of-school in WIA that youth remains an out-of-school youth under WIOA.

WIOA enrollment: The school status remains the same throughout the youth’s participation in the WIOA youth program for purposes of reporting against the OSY expenditure requirement. If the youth is determined to be an OSY at the time of WIOA enrollment and subsequently re-enters high school or enrolls in postsecondary education, that youth is still considered OSY throughout their participation in the WIOA youth program. (TEGL 8-15)

For OSY who are subject to the justice system, homeless, pregnant or parenting, or have a disability, income eligibility documentation is not required. WIOA Regs. 20 CFR Part 681.250

Eligible out-of-school youth are youth who are: (a) Not attending any school (a youth who is home-schooled may be considered either in-school or out-of-school dependent upon whether or not the home-school is registered with or has notified the County Superintendent of Schools. WIOA youth providers should verify registration or notification in order to determine the applicant’s school status.). § 681.230 NOTE: Adult Education under WIOA Title II, YouthBuild programs, and Job Corps programs are not considered to be “schools” under WIOA; (b) Not younger than 16 and not older than age 24 at time of enrollment. Because age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 24 once they are enrolled in the program; and (c) One or more of the following: 1. School dropout; § 681.240 ? A youth attending an alternative school at the time of registration is not a dropout. 2. Youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. School year calendar quarter is based on how a local school district defines its school year quarters; 3. A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either: a. basic skills deficient; or b. an English language learner; 4. An individual who is subject to the juvenile or adult justice system; 5. A homeless individual which may include: ? runaway youth; ? youth in foster care or has aged out of the foster care system; ? youth eligible for assistance under Sec. 477 of the Social Security Act (Chafee Foster Care Independence Program); or ? youth in an out-of-home placement 6. Pregnant or parenting; 7. Individual with a disability; 8. A low-income individual who requires additional assistance to: (1) complete an educational program; a youth who is in need of a high school diploma or equivalent; or has dropped out of a post-secondary educational program during the past 12 calendar months; or has a diploma but requires additional education; OR (2) secure and hold employment: a youth that is not currently attending any school (including a youth with a diploma or equivalent) who has not held a full-time job for more than three consecutive months; or has a poor work history, to include no work history; or has been fired from a job in the last 6 calendar months; or lacks work readiness skills necessary to obtain and retain employment;

§ 681.290 How does the Department define the “basic skills deficient” criterion in this part? (a) As defined in § 681.210(c)(3), a youth is “basic skills deficient” if he or she:

(1) Have English reading, writing, or computing skills at or below the 8 a generally accepted standardized test; or

(2) Are 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.
(b) The State or Local WDB must establish its policy on paragraph (a)(2) of this section in its respective State or local plan.

(c) In assessing basic skills, 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.

§ 681.300 How does the Department define the “requires additional assistance to enter or complete an educational program, or to secure and hold employment” criterion in this part for OSY? Either the State or the local level may establish definitions and eligibility documentation requirements for the “requires additional assistance to enter or complete an educational program, or to secure and hold employment” criterion of § 681.210(c)(9). In cases where the State WDB establishes State policy on this criterion, the State WDB must include the definition in the State Plan. In cases where the State WDB does not establish a policy, the Local WDB must establish a policy in its local plan if using this criterion.

§ 681.310 How does the Department define the “requires additional assistance to complete an educational program, or to secure and hold employment” criterion in this part for ISY? (a) Either the State or the local level may establish definitions and eligibility documentation requirements for the “requires additional assistance to complete an educational program, or to secure and hold employment” criterion of § 681.220(d)(8). In cases where the State WDB establishes State policy on this criterion, the State WDB must include the definition in the State Plan. In cases where the State WDB does not establish a policy, the Local WDB must establish a policy in its local plan if using this criterion. (b) In each local area, not more than five percent of the ISY newly enrolled in a given program year may be eligible based on the “requires additional assistance to complete an educational program or to secure or hold employment” criterion. § 681.250 C. Five-Percent (5%) Low Income Eligibility Exception Up to five-percent of all WIOA in-school and/or out-of-school youth participants may be participants who ordinarily would be required to be low-income for eligibility purposes and who meet all other eligibility criteria for WIOA except the low-income criteria. Youth enrolled under the 5% window are considered to be 5% throughout their enrollment and follow up.

D. Youth Service Priority 1. Priority for services shall be given to recipients of public assistance and low-income individuals consistent with the Workforce Innovation and Opportunity Act.

WIOA Section 3 (36) defines a Low-Income individual as an individual who: (a) receives, or in the past six (6) months has received, or is a member of a family that is receiving or in the past six (6) months has received, assistance through SNAP, cash payments under a Federal, State, or local income-based public assistance program such as TANF (Temporary Assistance for Needy Families), SSI (Supplemental Security Income), General Assistance (GA) or Refugee Cash Assistance (RCA); (b) received an income, or is a member of a family that received a total family income, for the 6-month period prior to application for the program involved (exclusive of unemployment compensation, child support payments, cash public assistance, and old-age and survivors insurance benefits under the Social Security Act that, in relation to family size, does not exceed the higher of (I) the poverty line, for an equivalent period; or (II) 70 percent of the lower living standard income level, for an equivalent period (see Section 3.70 Income/Family Size Determination for guidance on how low-income status is determined); (c) receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act; (d) qualifies as a homeless child or youth individual as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)))the Steward B. McKinney Homeless Assistance Act; (e) is an individual with a disability whose own income meets the requirements of a program described in
subparagraph (a) or (b), but who is a member of a family whose income does not meet such requirements. (f) is a youth in foster care on behalf of whom State or local government payments are made.

2. Individuals who are recipients of public assistance (TANF, SNAP/Food Stamps, Supplemental Security Income (SSI), Refugee Cash Assistance (RCA), and General Assistance (GA)) may meet Categorical Income Eligibility and considered automatically income eligible and no further income verification is required if the individual has provided acceptable documentation. (a) SNAP (Food Stamp) documentation must be current and verify that the individual receives or is a member of a household that is receiving SNAP benefits as described in 1. (c). Examples of documentation include the Letter of Award if the individual is the recipient, or documentation that lists the individual is a member of the household receiving SNAP, and documentation such as a SNAP benefit summary showing the dates to verify that benefits were received within the six-month period prior to application to a WIOA program.

(b) Cash Public Assistance: (1) TANF documentation must be current and verify that the individual receives or in the past six (6) months has received TANF payments, or is a member of a family that is receiving or in the past six (6) months has received TANF payments. Examples of acceptable documentation include the Letter of Award if the individual is the recipient, or documentation that lists the individual as a member of the family currently receiving TANF, and documentation such as the TANF benefit summary that shows the dates of the public assistance. Refer to the appropriate Verification Worksheet for complete list of acceptable documentation. (2) SSI, RCA and GA are payments made to a single recipient. The individual applying to WIOA must be the recipient and is currently receiving SSI, RCA or GA in order to be considered as receiving public assistance and would be considered as a family of one. Examples of acceptable documentation include the Award Letter or other authorization notice to receive cash public assistance.

3. Free or Reduced Lunch: The individual must be an in-school youth at the time of enrollment. If the youth is attending a school that provides free lunch to all students then the youth is considered to be receiving free lunch. Verification documentation for free or reduced lunch eligibility must be current or, in the case of youth enrolling during the summer, verify that the lunch eligibility was determined no more than one year (or previous school year) prior to WIOA eligibility determination.

4. Veterans’ Priority for Service. Covered Persons’ Priority: Refer to Section C. of WIOA 3.10 Adult and Dislocated Worker and the Glossary for further clarification of covered persons and priority for service.

E. Funding Requirements 1. WIOA Youth Program Elements: WIOA Title IB youth funds must be used to provide the following youth elements to eligible youth. Youth providers are not required to provide every WIOA element to youth however every element must be made known and available to youth. (Refer to Section 4.10 Youth Services and Activities for the list of requirement elements) 2. Out-of-School Youth Program: WIOA Law and Regulations require that 75% of WIOA funds allocated to youth programs must be used to provide activities to out-of-school youth. WIOA Law Sec. 129 (a)(4)(A) WIOA Regs. 20 CFR Part 681.410 3. Youth Work Experience: Local youth programs must expend not less than 20 percent of the funds allocated to them to provide in-school youth and out-of-school youth with paid and unpaid work experiences that have academic and occupational education as a component of the work experience. WIOA Regs. 20 CFR Part 681.590

Allowable expenditures for work experience can include: a. wages paid to the youth in work experience; b. staff time spent identifying potential work experience opportunities; c. staff time
working with employers to develop the work experience; d. staff time spent working with employers to ensure a successful work experience; e. participant work experience orientation sessions, classroom training or the required academic education component directly related to the work experience; f. orientation for employers. Adequate documentation must be maintained to ensure expenditures are legitimate and allowable.

F. Parent/Guardian Program Participation Consent Enrolling a minor into WIOA without parental consent can put the Connecticut Department of Labor and WIOA Youth Service providers at risk of being sued and increases liability, particularly if the participant is injured or mistreated. Service providers must obtain signed consent from a parent or guardian for youth who are under the age of 18. In situations where an unaccompanied minor, not in foster care, with no one assuming Legal Custody of them (most generally these are homeless or runaway youth) they are allowed to sign for themselves. Case managers must have very detailed case notes documenting the youth’s situation and also comment on the consent form and place the form in the participant’s file/CTHires case notes.

STATE DISPLACED HOMEMAKER PROGRAM § 680.630

The State Displaced Homemaker program provides pre-employment services to empower homemakers to enter or re-enter the labor market. Customers are women or men who have worked in the home caring for home and family but now must support themselves and their families due to loss of family financial support; unemployed or underemployed parents who are having difficulty obtaining suitable employment and will be losing TANF assistance; and offenders. 24.12.106-107 ARM & 39-7-302-303 MCA

A. Eligibility Requirements An individual must be a Connecticut resident (has resided in the state at least six months) and an adult 18 years or older. A Displaced Homemaker means an adult who: 1. (a) has worked as an adult primarily without remuneration to care for the home and family and for that reason has diminished marketable skills AND (b) has been dependent on public assistance or on the income of a relative but is no longer supported by that income; OR 2. whose youngest dependent child will become ineligible to receive assistance under the Temporary Assistance for Needy Families (TANF) program within two years of the parent’s application for displaced homemaker assistance; OR 3. is unemployed or underemployed and is experiencing difficulty in obtaining any employment or suitable employment OR 4. is a criminal offender and meets residency, age, and any of the requirements above.

An adult may be considered for the State Displaced Homemaker program if they meet any one of the eligibility requirements listed above in 1(a)(b) or 2 or 3. The offender must also meet age and residency requirements and 2 or 3 in order to be eligible for the State Displaced Homemaker Program.

To meet the criteria for 1(a)-(b) an individual must have worked mainly in the home for a minimum of three years within the last five years without remuneration to care for the home and family and experienced a displacement from homemaking activities such as caring for the needs of family members. The displacement is generally the loss of a spouse’s income through death, divorce or a disability, or because the individual is no longer caring for family members (spouse, parents, siblings) or other relatives.

B. Services The needs of displaced homemakers are extensive. Besides the problems associated with economic loss – child care, transportation, housing and lack of basic necessities – the
disruption of family life may result in emotional, medical and legal difficulties. Displaced homemakers often lack self-confidence and self-esteem, which can be formidable barriers to employment.

The goal of the Displaced Homemaker program is to help long-term homemakers develop and implement sound vocational plans leading to employment, which will allow them to become economically independent. This goal can be achieved through counseling, training, jobs, services and health care. Allowable services for State Displaced Homemakers may include but are not limited to the following: 1. Job counseling services that consist of developing an Employment Plan, skills assessment, testing, personal and career goal setting and similar activities (refer to the Assessment and IEP sections of this manual). 2. Training and employment activities that include: a. Training and placement programs for jobs in the public and private sectors; b. Assistance to participants in gaining enrollment in a public or proprietary school or other institutional setting for pre-vocational or vocational instruction. c. Job placement assistance in obtaining unsubsidized employment. Note: Whenever possible, participants must be given priority to fill supervisory, technical, and administrative positions in service provider offices. d. Preparing participants for training and placement into nontraditional careers.

3. Basic Skills Assessments Literacy and math assessments are required for all participants. Refer to manual Section 3.40.

4. Supportive Services The needs of displaced homemakers may be extensive. Besides the problems associated with economic loss such as child care, transportation, housing and lack of basic necessities, the disruption of family life may result in emotional, medical and legal difficulties. Supportive services are available to help with some of the needs resulting from the displacement. Those services may include but are not limited to: a. child care for preschool children; b. health care; c. transportation assistance to participate in the program; d. financial counseling; e. grants for education; f. temporary shelter; and g. post-termination services i.e., follow-up services after exit.

Refer to the Supportive Services (Section 4.100).

5. Referral Displaced homemakers often lack self-confidence and self-esteem, which can be formidable barriers to employment. Crisis intervention and counseling are often critical preliminary needs of displaced homemakers. Referral to relevant community service agencies will provide information and assistance with respect to such items as health care, financial matters, education, nutrition, and legal problems.

6. Enrollment into follow-up when the participant attains unsubsidized employment is not a requirement of State Displaced Homemaker Program. However, case manager may enroll in follow-up if deemed appropriate to further assist the participant. Case managers may decide that it’s more appropriate to continue enrollment in the program for a limited time to provide continue to provide assistance such as supportive services ASSESSMENT AND PLANNING

I. INITIAL ASSESSMENT § 680.170 Initial assessment is part of the overall intake process and includes the initial determination of each individual’s employability, aptitudes, abilities and interests through interview, testing and counseling. All participants must have an initial assessment completed to evaluate basic skills, experience, and the appropriateness for service and ability to benefit from the Workforce Innovation and Opportunity Act. When the initial assessment indicates that Individualized Career Services are appropriate, an Individual Employment Plan (IEP –WIOA.16) is then completed for adults and dislocated workers. Regarding youth, if an initial assessment indicates
that additional services should be provided, an Individual Service Strategy (ISS - WIOA.17) will be developed.

II. COMPREHENSIVE ASSESSMENT GUIDELINES

A. Individual Employment Plan or Individual Service Strategy

A complete assessment is an independent, comprehensive evaluation of an individual, designed to identify information vital to the development of a service strategy and to set goals and objectives which culminate in gainful employment.

The IEP/ISS should be revisited on a regular basis and amended, as appropriate, when additional needs are identified or goals are achieved. Assessment is a holistic, ongoing process and should not be viewed as a one-time event. It should include a full array of options for the participant from which program staff, together with the participant, makes informed decisions and select the appropriate services, which will best enable the participant to seek and retain long-term self-sufficient employment. 

a. Assessment means an examination of the capabilities, needs and vocational potential of an applicant or participant. 

b. An initial assessment indicates that additional services are appropriate and triggers the completion of an Individual Employment Plan (IEP) or Individual Service Strategy (ISS) and registration in WIOA Title I programs.

c. A comprehensive assessment is completed upon enrollment in the WIOA program. The comprehensive assessment provides specific information for the development of the IEP/ISS.

d. WIOA service providers must use the assessment tools provided through their individual Workforce Development Boards when working with their participants in the comprehensive assessment process. Service providers are required to track their work via activities in the CTHires system.

e. A written copy of the clients IEP/ISS should be maintained in the participants file or scanned/uploaded to the CTHires system.

B. Developing the Individual Employment Plan or the Individual Service Strategy

The assessment of the participant should be client-centered and provide for a diagnostic evaluation of a participant’s employment barriers, taking into account the participant’s family situation, work history, education, occupational skills, interests, aptitudes, attitudes towards work, motivation, behavior patterns affecting employment potential, financial resources and needs, supportive service needs, and personal employment information as it relates to the local labor market. The name(s) of the assessor, name(s) of participants being assessed and assessment results need to be identified on the IEP/ISS.

C. Assessments by Other Programs

Initial assessments such as interest inventories, career assessment and similar assessments (other than basic skills assessments) conducted by other human service programs or educational institutions within the last six months may be used where appropriate, rather than requiring the participant to undergo additional, duplicative assessments, which may disrupt and discourage further participation. However, the service provider should evaluate the information provided and complete updated assessments if needed for effective WIOA program planning and update the ISS/IEP appropriately.

III. BASIC SKILLS ASSESSMENT GUIDELINES

A. All Adult and Dislocated Worker participants, should be tested using Only National Reporting System-approved Connecticut Competency System (CCS) test tools must be used for pre- and post-testing of youth.

Testing-Tools

Only National Reporting System-approved Connecticut Competency System (CCS) test tools must be used for pre- and post-testing of youth.
The WIBs and/or their designees are to use the CCS/CASAS Life and Work series for pre- and post-testing of Reading and the CCS/CASAS Life Skills series for Math, unless circumstances indicate that another series is more appropriate for an individual.

IV. Appraisal

In the CCS system, an appraisal is administered to determine the appropriate level pre-test for measuring reading and math competencies.

WDB’s have four options with regard to the use of appraisals to guide pre-test selection:

1. Administration of the CASAS Life Skills series 50 appraisal form for math and reading; 2. Administration of the Life and Work Skills series 80 appraisal form for reading; 3. Administration of computer adaptive testing locator (i.e. CASAS eTests locator), which automatically assigns the student to the appropriate level pre-test; or 4. In lieu of an appraisal, administration of a level D pre-test for reading and a level C pre-test for math.

When computer adaptive testing (e-testing) is utilized, test results are recorded under pre-test scores in CTWBS.

V. Assessment Pre-testing

Assessment pre-testing is required for all out-of-school youth entering the WIOA youth program.

A. Criteria for selection of pre-test: The selection of the appropriate level pre-test is determined by the result of an appraisal test or CASAS eTests locator. If the appraisal is not administered, a level D pre-test for reading and a level C pre-test for math are used.

When computer adaptive testing (e-testing) is utilized, test results are recorded under pre-test scores in CTWBS.

B. The assessment pre-test is: administered within sixty days of the date of the first WIA youth program service, and

• it is given as soon as possible prior to the occurrence of any substantial instructional intervention. “Substantial instructional intervention” is instruction that one would reasonably expect to affect test results

C. An out-of-school youth who scores below 236 on the pre-test in either math or reading is subject to the Literacy/Numeracy common measure.

VI. Assessment Post-Testing

Out-of-school youth who were determined to be basic skills deficient are post-tested until they score 236 or higher in both reading and math, or until they exit the program.

A. The initial post-test version must be in the same series as the pre-test.
B. The CCS test form number of each subsequent post-test must be different from the form number of the last taken test. The form may or may not be in the same scoring range dependent upon the score of the last taken test.

C. The initial post-test must be administered within one calendar year, that is 364 days, of the date of the first WIA youth program service.

D. Second year post-testing and instruction must be administered prior to the second anniversary date of the first WIA youth services.

E. Subsequent year post-tests and instruction must be administered prior to that year’s anniversary date of the first WIA youth service.

VII. Basic Skills Deficiency and Eligibility Determination

A youth who scores below 236 on the pre-test in either math or reading is considered basic skills deficient for eligibility purposes.

Appraisal results (i.e., results from the Life and Work 80 and/or CCS 50 tools) may not be used to determine basic skills deficiency for the purpose of eligibility determination.

The WIBs are to accept CCS test scores from adult education for the purpose of determining WIA eligibility provided that: There has not been substantial instructional intervention; and Test results are no more than 90 days old.

The WIBs, at their discretion, may accept CCS test scores from organizations and agencies other than adult education for the purpose of determining WIA eligibility provided that: There has not been substantial instructional intervention; and Test results are no more than 90 days old.

VIII. In-School Youth

Although in-school youth are not included in the Literacy and Numeracy Gain measure, it is the expectation of the U.S. Department of Labor that the educational functioning level of all youth be reviewed under WIA.

The methods of review include but are not limited to: Review of school records, Information gathered from the in-school youth participant and/or family member; and Assessment pre-testing using CCS and/or other tools which measure educational skill levels.

WIBs are not required to administer appraisal and pre-test assessment to in-school youth. However, WIBs may do so at their own discretion.

IX. Accepting Test Results from Outside Entities

The WIBs are to accept NRS approved CCS test scores from adult education for the purposes of determining pre-test selection and/or as a pre-test score provided that:

there has not been substantial instructional intervention; and test results are no more than 90 days old.
The WIBs, at their discretion, may accept NRS-approved CCS test scores from organizations and agencies other than adult education, provided that these conditions regarding substantial instructional intervention and age of test results are met.

CCS test scores from any series (that is, Life Skills, Workforce Learning Systems - WLS, Life and Work - LW, Citizenship) may be accepted.

Release authorizations, signed by the student, or legal guardian if appropriate, must accompany test results coming from adult education or any other organization.

X. Testing Youth with Special Needs and/or Disabilities

WIBs are responsible for providing reasonable accommodations when testing youth with documented disabilities.

Accommodations in testing alter the conditions for administering a test or change the nature of an instrument allowing test-takers with disabilities to demonstrate more accurately their skills and abilities. Proper accommodations meet the needs of examinees without changing what a test is intended to measure.

Accommodations may be similar to “test-taking strategies” such as: • requesting to take only one test per day, • testing in an alternate quiet room or • taking frequent breaks.

Test-takers may also use a variety of aides when taking a test, such as using: • a plain straight-edge ruler, • a different type of answer sheet, • magnifying strips, • colored overlays, • ear plugs, or • other devices as deemed appropriate.

It is not an appropriate accommodation to read a reading test to a test-taker with low literacy skills or blindness. The purpose of a reading test is to assess reading skill levels and to determine the test-taker's appropriate instructional level, not to assess knowledge of a subject area. [See CCS Assessment Policies and Guidelines.]

When administering appraisal and assessment tools, individuals with disabilities are to be provided with reasonable accommodations, as appropriate, according to: 1. Section 188 of the Workforce Investment Act (implementing regulation at 29 CFR Part 37), Section 504 of the Rehabilitation Act of 1973 (DOL implementing regulations at 29 CFR Part 32), and Title II of the Americans with Disabilities Act, if applicable, (implementing regulations at 28 CFR 35); 2. Guidelines associated with the appraisal and assessment tools; and 3. State laws and/or policy.

Regulations implementing WIA Section 188, found at 29 CFR Part 37, provide a general definition of “reasonable accommodation” for individuals with disabilities. In essence, such accommodations are modifications or adjustments, made on a case-by-case basis, “that enable a qualified individual with a disability . . . to receive aid, benefits, services, or training equal to that provided to qualified individuals without disabilities.” (See 29 CFR Part 37.4, definition of “reasonable accommodation.”)

In the appraisal and assessment context, “accommodations” are changes that are made to the materials or procedures used for the assessment to ensure that the assessment tool measures the
individual’s skills and abilities, and not his or her disabilities. Because youth with disabilities are expected to achieve the same gains as other youth, it is critically important that appropriate accommodations be provided for the assessment process, to ensure that the gains achieved by these youth can be determined accurately.

Accommodations for the assessment process generally fall into the following categories: Changes to the methods of presentation of the tool used as appraisal or assessment tool: e.g., providing Braille versions of the test, or orally reading the directions or test questions to test-takers:

Changes to the methods or response to the test questions: e.g., having the test-taker point to a response or use a computer for responding:

Changes to the setting in which the test is provided: e.g., permitting the test to be taken at home, or in small groups, rather than in a large-group or institutional setting; and/or

Changes to the timing/scheduling of the test: e.g., extending the amount of time generally provided for completion of the test, permitting frequent breaks.

The Employment and Training Administration (ETA) of the U.S. Department of Labor fully expects that most youth with disabilities can, and should, be assessed using tests that specifically crosswalk to educational functioning levels, using accommodations where needed. ETA also recognizes that in very limited instances, use of these testing instruments, even with appropriate accommodations, may not provide a valid or reliable evaluation of the literacy and numeracy skills of a youth with one or more disabilities. These instances may arise because of the nature or extent of a particular individual’s disability, and/or because of limitations in the testing instruments themselves.

Testing accommodations must be consistent with the disability documentation. Test-takers are responsible for providing documentation of the disability. Decisions regarding accommodations are made on a case-by-case basis.

XI Performance Adjustment

The U.S. Department of Labor and the Connecticut Department of Labor acknowledge that the nature of some disabilities, such as severe cognitive impairment, may preclude meaningful literacy and numeracy testing and consequent attainment of the literacy and numeracy common measure goal. It is not the intent of the federal and state Departments of Labor to discourage WIA participation by individuals who have such disabilities.

In order to foster WIA program development for individuals who have such disabilities, WIBs may request one of two adjustment methods:

1. Service to individuals with such circumstances can be addressed in annual WIA performance negotiations. In effect, negotiated target performance would be adjusted from expected levels so that a WIB would not be penalized for serving individuals who may not reasonably be expected to attain a positive outcome in a performance measure, specifically the measures for attainment of a degree or certificate or an increase in literacy and numeracy.

2. WIBs can request a performance adjustment at the end of the program year being measured. As part of such a request, WIBs must demonstrate that the inclusion of individuals with such circumstances negatively impacted performance.
XII. Test Administration

WIBs must designate a WIB CCS Program Facilitator who is trained by the State Department of Education in CCS test administration. The Facilitator will be responsible for testing and/or for training test facilitators. The Facilitator must complete CCS Training Part 1 (Appraisals) and Part 2 (Survey Achievement Pre and Post Assessments).

WIBs must maintain a current Test Security Agreement that outlines the requirements relative to the secure storage and handling of all CCS materials. A signed Test Security Agreement must be filed with Adult Training and Development Network (ATDN) division of CREC or other entity designated by the Connecticut State Department of Education.

Resources:


• CFR- Title 34, Subtitle B, Chapter IV, Part 462

http://www.gpo.gov/

• Federal Register Volume 77, Issue 151 (August 6, 2012)- 77 FR 46749 - TESTS DETERMINED TO BE SUITABLE FOR USE IN THE NATIONAL REPORTING SYSTEM FOR ADULT EDUCATION

http://www.gpo.gov/fdsys/granule/FR-2012-08-06/2012-19143

B. Youth Participants Objective Assessment: WIOA Law (Sec. 129 (c) (1)(A) requires that youth receive an objective assessment of the academic levels, skills levels, and service needs.

The Objective Assessment (OA) shall include a review of all the following: ? Basic skills ? Occupational skills ? Prior work experience ? Employability ? Interests ? Aptitudes (including interests and aptitudes for nontraditional jobs) ? Supportive service needs ? Developmental needs

WIOA does not require a new OA if the provider determines it is appropriate to use a recent assessment (within last six (6) months) of the participant conducted by another education or training program. This may include evaluations completed by a secondary school, Vocational Rehabilitation, Adult Basic and Literacy Education (ABLE) or other education or training providers.
Academic Skills Assessments: Academic skills assessments help program staff determine participants’ academic skill levels and uncover any subject areas requiring improvement. Case managers should use assessment results to guide the academic support services they provide the youth to help them gain aptitudes and increase literacy. Support may include case managers engaging dedicated tutors to assist participants improve math or reading comprehension.

1. All Out-of-School Youth must be assessed for basic skills deficiencies. An out-of-school youth is a youth who is not attending any school. This includes youth who are home schooled; and Youth who are not younger than 16 nor older than age 24 at the time of enrollment.

2. Pre-Testing and Post Testing Only National Reporting System-approved Connecticut Competency System (CCS) test tools must be used for pre- and post-testing of youth.

The WDBs and/or their designees are to use the CCS/CASAS Life and Work series for pre- and post-testing of Reading and the CCS/CASAS Life Skills series for Math, unless circumstances indicate that another series is more appropriate for an individual.

IV. Appraisal

• All pre-tests must be administered within 10 working days of enrollment in the WIOA Youth program. • WIOA Youth service providers will not administer any pre-test prior to the participant’s enrollment in the WIOA Youth program. Service Providers may use pre-tests that are administered up to six months prior to the date of first WIOA youth service, if such pre-test scores are available. The tests have to be an approved type and would have been administered through the Adult Basic Education (ABE) program.

A copy of the CASAS scoring sheet indicating grade level skills must be maintained in each participant file. The results (reading/math) need to be quantifiable through grade equivalency scores or raw score from criterion-referenced assessment tools and entered into CTHires.

Plans to address grade level skills below the ninth grade must be documented on the ISS.

b. Post-Testing: Out-of-School Youth: All out-of-school youth who receive services and tested below 9.0 on their pre-test must be post-tested using the same TABE standardized test that was part of their initial assessment. The post-test will show gains or losses in educational grade equivalency and be an indication of correct or incorrect program activities. Post-testing of out-of-school youth is required to report literacy/numeracy gains for performance purposes.

3. No money will be spent on out-of-school youth participants: • until the pre-test has been administered; and • if the post-test is not administered within the prescribed timelines established for post testing.

NOTE: Providers who fail to administer either the pre-test or post-test within the prescribed timelines will be subject to corrective action which could include repayment of any funds expended on the youth for the period of time the youth should have been tested. Refer to Section 5.80 Literacy and Numeracy for Out-of-School Youth for policy and guidance on remediation and post-testing.

4. In-School Youth: High-school youth (including youth attending an alternative school) do not need to be assessed for basic skills, however USDOL requires that states track youth who are basic skills deficient. Documentation of basic skills deficiencies includes: school records; a current IEP; or report
Basic skills deficiencies should be documented in case notes with supporting documentation maintained in the participant’s file.

INDIVIDUAL EMPLOYMENT PLAN (IEP)

A. Description An Individual Employment Plan (IEP) is required for Adult and Dislocated Worker participants in WIOA Title IB Individualized Career and Training services. It is both a form and a continual process. The IEP is developed in partnership with the participant. The IEP identifies where the participant is, where the participant wants to be and the appropriate mix and sequence of services and support to reach a realistic employment goal. The development of the IEP and updates or revisions should be based upon the results of the comprehensive assessment process.

1. Initially the IEP shall be the basic instrument, which documents: a. That participants have had an initial assessment; b. The decisions made regarding the mix and combination of services for the participant, including referrals; and c. Quarterly reviews to evaluate the progress of the participant in meeting planned objectives. 2. The IEP form shall include a description of: a. Short and long term goal(s) and objectives; b. Appropriate, measurable achievement objectives to meet those goals; c. Mix and sequence of services and other resources needed d. Organizations and/or individuals who will provide those services or resources; and e. The twelve-months of supplemental follow-up contact with participants who have exited to unsubsidized employment for performance purposes; and 12 months of follow-up services which may be provided to participants who have entered unsubsidized employment to help them with employment retention, wage gains and their career progress. (The extent of the follow-up services provided may be based on the availability of funding) Service providers must use the Individual Employment Plan (WIOA.16) provided in the Forms Section on DLI’s WIOA website.

A signed copy (signed by program staff and participant) must be provided to the participant and the original attached to the Individual Employment Plan and maintained in the participant’s file. Once the IEP form is complete and the participant in enrolled in a WIOA or state program, case managers must open up a ConnecticutWorks Employment Plan for that participant. The goals, objectives and potential services based on the information in the IEP should be set up in the Employment Plan and from that point on case managers will use the Employment Plan as a continuance of the IEP. The Employment Plan should be reviewed regularly and updated quarterly as documented in case or progress notes. Follow-up services must be opened on the current ConnecticutWorks Employment Plan for all adults who have exited to unsubsidized employment. Case managers should not open a separate Employment Plan for Follow-up. The participant will not be required to sign the ConnecticutWorks Employment Plan each time the plan is updated unless there are major changes in the goals.

B. Goals and Objectives Goals and objectives are the desired short and long-term program goals and outcomes and the steps established between program staff and the participant which, when reached, represent successful completion of that portion of the service plan. For each employment goal there should be one or more interim objectives. These objectives should be achievable in manageable steps, enabling the client to attain success.

Not every agency can provide all the services indicated by the comprehensive assessment and noted in the IEP. There is the expectation that if the needed services exist and are accessible in a community the agency will make a reasonable, concerted effort to link participants with those services. However, it is recognized that enrollment in WIOA is neither an entitlement nor legal right to services, nor automatic access to limited resources. Therefore, it is expected that if needed
services are not available, it shall be so documented on the IEP, and alternative plans shall be developed. A facsimile of the IEP and instructions for completion can be found in the Forms Section on DLI’s WIOA website.

INDIVIDUAL SERVICE STRATEGY (ISS)

A. Description An Individual Service Strategy (ISS) is required for all WIOA Title IB youth (in-school and out-of-school) participants. Services provided under WIOA Title I youth programs are based on the individual needs of the participant, therefore the participant must be involved in the design and implementation of services to ensure their needs are being met.

The ISS identifies where the participant is, where the participant wants to be, and the appropriate mix and sequence of services and support to reach realistic goals. It is both a form and a continual process.

1. The ISS form shall be the basic instrument used to: a. Document the results of the objective assessment that included the review of the academic and occupational skill levels, as well as the service needs, of each youth for the purpose of identifying the appropriate services and career pathways for participants; b. Identify the appropriate career pathways that include education and employment goals; c. Consider career planning and the results of the objective assessment; and d. Prescribe achievement objectives and services for the participant including: program/employment/career goals, timeline for attainment, expected wage at placement; e. Determine the mix and sequence of services, including supportive services, and other resources needed to achieve program/employment/career goals; components of this section include: (1) short and long-term objectives; (2) which WIOA program element(s) to provide based on the participants objective assessment that will assist the youth in achieving short and long-term objectives; (3) Timeline for attainment and date attained; f. Document how the program element is being provided, i.e., in-house or through a referral with a specific agency or service listed; g. As appropriate determine effective connections to employers, including small employers, in in-demand industry sectors and occupations: and h. Discuss the provision of follow-up services that will track the progress of youth after exit from the program; and based on the youth’s needs, providing assistance to help the youth secure better jobs, career development and further education.

The ISS should be reviewed at least quarterly and updated as needed.

The Basic Skills Assessment (TABE) Agreement (page 4 of the Individual Service Strategy) is attached to the ISS. The Agreement must also be signed and dated by all out-of-school youth and program staff. A signed copy of this Agreement must be provided to the participant and the original attached to the ISS and maintained in the participant’s file.

Once the ISS is complete and the participant is enrolled in a WIOA program, case managers must open up a ConnecticutWorks Employment Plan for that participant. The Individual Service Strategy service must be opened on the Employment Plan and services identified through ISS goals opened and closed as appropriate.

The participant will not be required to sign the Employment Plan when it’s opened for the first time in ConnecticutWorks nor when the plan is updated unless there are major changes in the goals.
B. Objective Assessment WIOA Law (Sec. 129 (c) (1)(A) and Regulations 20 CFR 664.400(a)(1)) require that youth receive an objective assessment of the academic levels, skills levels, and service needs.

The Objective Assessment (OA) shall include a review of all the following: ? Basic skills ? Occupational skills ? Prior work experience ? Employability ? Interests ? Aptitudes (including interests and aptitudes for nontraditional jobs) ? Supportive service needs ? Developmental needs

Service providers are required to provide an objective assessment of the academic levels, skill levels and service needs of each participant, which shall include a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes (including interests and aptitudes for nontraditional jobs), supportive service needs, and developmental needs of such participant. Participants concurrently registered in Youth, Adult and Dislocated Worker Programs will require both an ISS and an IEP.

C. Basic Skills Assessment All out-of-school youth participants shall be assessed for basic skill levels (Reading and Math) using the Test for Adult Basic Education (TABE) Standardized Test (not the TABE Locator). TABE scores for both reading and math must be posted on the ISS and remediation needs (if applicable) addressed in the Other Academic Needs. A copy of the scoring sheet indicating grade level shall be maintained in each participant file. The scoring sheet must include the score, the participant’s name, the name of test administrator and the date the test was administered.

Literacy and numeracy gains are not performance measures for the in-school youth however poor math and/or reading skills could be a factor in the participant’s education and employment goals. Deficiencies should be discussed with the participant to provide them the opportunity to determine how they want to address the deficiencies and explore options for improvement.

D. Individual Service Strategy and Objective Assessments from Other Agencies WIOA does not require a new OA if the provider determines it is appropriate to use a recent assessment (within last six (6) months) of the participant conducted by another education or training program. This may include evaluations completed by a secondary school, Vocational Rehabilitation, Adult Basic and Literacy Education (ABLE) or other education or training providers.

The methods used for other assessments and/or service strategies should include, but are not limited to, structured interviews, paper and pencil tests, performance tests, behavioral observations, interest and attitude inventories, career guidance instruments, personality profiles and aptitude tests. Assessment results shall be maintained in each participants file and include the participant's name and the date the assessment was conducted.

FAMILY SIZE AND INCOME DETERMINATION

A. Family Size Family size must be determined and verified only if using family income to determine low-income status. Family size will be determined by counting the maximum number of family members in the residence during the last 6 months, not including the current month.

A family, for eligibility purposes, means two or more persons related by blood, marriage, or decree of court, who are living in a single residence. Family may also include a parent or guardian and dependent children. (Refer to the Glossary for the definitions of “dependent children” and “independent children” under Family)
In certain cases, an individual may be considered a "family of one" for the purpose of eligibility determination. This includes individuals with a disability whose family income may exceed the income criteria, but whose own income meets the income criteria. 20 CFR 680.640 (Adult) 20 CFR 681.280 (Youth) B. Income Determination Income is the amount of all reportable income for each family member for the prior six (6) months, not including the current month. This amount multiplied by two (2) is the total annualized family income.

Family income means all includable income actually received from all sources by all members of the family during the income determination period. However, when computing family income, the income of a spouse and/or other family members shall only be counted for that portion of the income determination period that the person was actually a part of the family of the applicant. Family size for the determination period is the maximum size of the family during such period. All items not expressly excluded are includable income.

Applicants having minimum or no income should complete an applicant statement that describes their means of support in the last six months. A facsimile of an applicant statement is in the Forms Section on DLI’s WIOA website.

INCLUDE In Family Income: 1. Money wages and salaries before any deductions; Net receipts from non-farm self-employment (receipts from a person’s own unincorporated business, professional enterprise, or partnership after deductions for business expense); 2. Net receipts from farm self-employment (receipts from a farm which one operates as an owner, renter, or sharecropper, after deductions for farm operating expenses); 3. Regular payments from railroad retirement, strike benefits from union funds, worker’s compensation, and training stipends; 4. Alimony; 5. Military family allotments or other regular support from an absent family member or someone not living in the household; 6. Pensions whether private, government employee (including Military retirement pay); 7. Regular insurance or annuity payments other than Supplemental Security Income disability (SSI) or veterans’ disability; 8. College or university grants, fellowships, and assistantships; 9. Net gambling or lottery winnings; 10. Social Security Disability Insurance payments (SSDI) • Social Security Disability Insurance (SSDI) pays benefits to individuals that have worked in the past, paid Social Security taxes, and are currently unable to work for a year or more because of a disability. SSDI is considered income replacement and must be included in family income.

EXCLUDE from family income: 1. Unemployment compensation; 2. Child support payments; 3. Public Assistance cash payments (including Temporary Assistance to Needy Families (TANF), Supplemental Security Income (SSI), Refugee Case Assistance (RCA), and General Assistance (GA)); • Supplemental Security Income (SSI) is a program that pays benefits to disabled adults and children who have limited income and resources. It is also paid to people 65 and older without disabilities who meet the financial limits. SSI is considered cash assistance and individuals receiving SSI are automatically income eligible the same as individuals receiving TANF or SNAP. A WIOA applicant on SSI is a family of one. Refer to the Adult or Youth Verification Worksheets for acceptable documentation for SSI recipients. 4. Foster care child payments; 5. Title IV of the Higher Education Act (i.e., Pell Grants, Federal Supplemental Educational Opportunity Grants (FSEOG), and Federal Work-Study (FWS); 6. Needs-Based scholarship assistance; 7. Income earned while [the veteran was] on active military duty and certain veteran’s benefits (i.e., compensation for service-connected disability, compensation for service-connected death, vocational rehabilitation, and education assistance); 8. Capital gains; 9. Any assets drawn down as withdrawals from a bank, the sale of property, a house or a car; 10. Tax refunds, gifts, loans, lump-sum inheritances, one-time insurance payments, or compensation for injury; 11. Non-cash benefits such as employer paid fringe benefits, food or housing received in lieu of wages, Medicare, Medicaid, school meals, and housing
assistance; 12. Tribal Government Payments (i.e., Per Capita Payments, Lease Payments, Individual Indian Money (IIM)); 13. Old age and survivors insurance benefits received under section 202 of the Social Security Act (42 USC 402). • Old age and survivors insurance benefits include: Social Security Survivor Benefits – these are benefits paid to people up to age 18 who have had a parent die and the parent paid wages into the system; and • Social Security Retirement Benefits – these are benefits that are paid to people who reached their social security age and have wages paid in the system.

C. Income Table for Adults and Youth

Persons in family / household 2016 Federal Poverty Level (FPL) 1 $11,880* 2 $16,020 3 $20,160 4 $24,300 5 $28,440 6 $32,580 7 $36,730 8 $40,890 for each additional person, add: $4,160

Explanation of Income Table The table is a combined listing of seventy (70) percent of Lower Living Standard Income Levels (LLSIL) and OMB Poverty Guidelines. The figures are annualized (12-month) incomes. The figure marked with an asterisk (*) is from the poverty guidelines published by Health and Human Services; the remainder is from LLSIL figures for metro and non-metro areas.

SELECTIVE SERVICE REGISTRATION REQUIREMENTS

A. Selective Service Registration All participants enrolled in WIOA Adult, Dislocated Worker and Youth programs must be in compliance with Selective Service Registration under the Military Selective Service Act as a condition for participation.

Males between the ages of 18 and 26 who must register with the Selective Service include: 1. Citizens of the United States; 2. Non-citizens, including illegal aliens, legal permanent residents, seasonal agricultural workers, and refugees, who take up residency in the U.S. before their 26th birthday; and/ or; 3. Dual nationals of the United States and another country regardless of whether they live in the United States.

Selective Service registration is not required of U.S. citizens if the male falls within one of the following categories: 1. Men who are serving in the military on full-time active duty; 2. Men attending the service academies; and 3. Disabled men who are continually confined to a residence, hospital or institution; 4. Men who are hospitalized, institutionalized, or incarcerated are not required to register during their confinement; however, they must register within 30 days after being released if they have not yet reached their 26th birthday.

Selective Service registration is not required of non-U.S. citizens if the male falls within one of the following categories: 1. Non-U.S. male who came into this country for the first time after his 26th birthday and has acceptable forms of supporting documentation including: a. Date of entry stamp in his passport; b. I-94 with date of entry stamp on it; or c. A letter from the U.S. Citizenship and Immigration Services (USCIS) indicating the date the man entered the United States presented in conjunction with documentation establishing the individual’s age. 2. Non-U.S. male who entered the U.S. illegally after his 26th birthday. He must provide proof that he was not living in the U.S. from age 18 through 25. 3. Non-U.S. male on a valid non-immigrant visa.

The lists are not intended to be exhaustive and the Selective Service System provides a quick reference chart showing who must register on the Selective Service website at http://www.sss.gov/PDFs/WhoMustRegisterChart.pdf
B. Selective Service Compliance In order to be eligible to receive WIOA-funded services, all males born on or after January 1, 1960 must present documentation showing compliance with the Selective Service registration requirement. Acceptable documentation showing registration status includes: 1. Selective Service Acknowledgement letter 2. Form DD-214 "Report of Separation" 3. Screen printout of the Selective Service Verification on the Selective Service website at www.sss.gov/RegVer/wfVerification.aspx. For males who have already registered this website can be used to confirm their Selective Service number as well as the date of registration, by entering a last name, social security number, and date of birth. 4. Selective Service Registration Card 5. Selective Service Verification Form (Form 3A) 6. Stamped Post Office Receipt of Registration.

C. Registration Requirements for Males Under 26 Prior to being enrolled in a WIOA-funded program, all males born on or after January 1, 1960 who are not registered with the Selective Service and have not reached their 26th birthday must register through the Selective Service website at http://www.sss.gov.

Male participants who enter the WIOA program at age 17 or younger and attain age 18 while participating in the program must be registered for Selective Service by the 30th day after their 18th birthday to remain eligible for WIOA services. Funds expended on male participants not registered for Selective Service by the 30th day after their 18th birthday may be considered disallowed costs.

Any male youth participant who attains age 18 while enrolled in WIOA and refuses to comply with Selective Service Registration requirements shall be exited from the WIOA youth program. These youth would not be placed in follow-up and there should be case notes in ConnecticutWorks that describe, in detail, the circumstances as to why services were not/could not be continued.

D. Registration Requirements for Males 26 Years and Over Prior to being enrolled in a WIOA-funded program, all males 26 years of age or older, must provide documentation of compliance with the Selective Service registration requirement. Individuals who did not register for the Selective Service or who cannot provide any of the documentation listed above must obtain a Status Information Letter from Selective Service indicating whether he was required to register. The Request for Status Information Letter can be accessed at http://www.sss.gov/PDFs/infoform.pdf and the instructions can be accessed at http://www.sss.gov/PDFs/instructions.pdf.

The individual will need to describe, in detail, the circumstances that prevented him from registering (e.g., hospitalization, institutionalization, incarceration, military service) and provide documentation of those circumstances. The documentation should be specific as to the dates of the circumstances. The Status Information Letter is good for life and the individual should be encouraged to keep their original letter in a safe place for future reference. If the Status Information Letter indicates that an individual was not required to register for the Selective Service, then he is eligible to enroll in WIOA-funded services.

If the Status Information Letter indicates that the individual was required to register and now cannot because he is 26 or older, he is presumed to be disqualified from participation in WIOA-funded activities and services until it can be determined that his failure to register was not knowing and willful. All costs associated with WIOA-funded services provided to non-eligible individuals may be disallowed.

E. Determining Knowing and Willful Failure to Register If an individual was required to register with Selective Service but failed to do so the individual may only receive services if they can provide evidence to establish that the failure to register was not knowing and willful. Service providers will be
responsible for evaluating the evidence presented by the individual and determining whether the failure to register was a knowing and willful failure.

The individual should be encouraged to offer as much evidence and in as much detail as possible to support his case. Evidence may include an applicant’s statement and supporting documentation of his circumstances at the time of the required registration and the reason for failure to register. Examples of documentation that may help in making a determination in these cases include: 1. Service in Armed Forces. Documentation verifying that a man has served honorably in the U.S. Armed Forces such as the DD Form 214 or his Honorable Discharge Certificate may be considered sufficient evidence that his failure to register was not willful or knowing. 2. Third Party Affidavits. Affidavits from parents, teachers, employers, doctors, etc. concerning reasons for not registering, are also acceptable documentation that may also be helpful to service providers determining whether the failure to register was willful and knowing.

In determining whether the failure was “knowing”, service providers should consider: 1. Was the individual aware of the requirement to register? 2. If the individual knew about the requirement to register, was he misinformed about the applicability of the requirement to him (e.g., veterans who were discharged before their 26th birthday were occasionally told that they did not need to register)? 3. On which date did the individual first learn that he was required to register? 4. Where did the individual live when he was between the ages of 18 and 26? 5. Does the status information letter indicate that Selective Service sent letters to the individual at that address and did not receive a response?

In determining whether the failure was “willful”, service providers should consider: 1. Was the failure to register done deliberately and intentionally? 2. Did the individual have the mental capacity to choose whether or not to register and decided not to register? 3. What actions, if any, did the individual take when he learned of the requirement to register?

If the service provider determines it was not a knowing and willful failure and the individual is otherwise eligible, services may be provided. If the service provider determines that evidence shows that the individual’s failure to register was knowing, and willful, WIOA services must be denied. Individuals denied services must be advised of available WIOA grievance procedures. Service providers must keep documentation related to all evidence presented in determinations related to Selective Service.

SOCIAL SECURITY NUMBER PROCEDURE

In accordance with Section 7 of the Privacy Act of 1974 (5 U.S.C. Section 552a Note (Disclosure of Social Security Number), unless the disclosure is required by Federal statute, applicants may not be denied any right, benefit or privilege provided by law because of the individual’s refusal to disclose his/her Social Security Number (SSN).

Disclosure of an individual’s social security number pursuant to the Internal Revenue Code where it is used as the identifying number for the purposes of a return, statement or any other document under the Code (i.e., for payment of wages for OJT, Work Experience, etc.) may be properly required. NOTE: Applicants who do not possess a Social Security card must apply for one to ensure that a copy of that card may be placed in the applicant file.

A. Guidelines For Obtaining Social Security Number Although an applicant cannot be denied WIOA services for failure to disclose their SSN, they must submit their SSN in order to receive wages paid
while participating in WIOA (i.e., OJT). Training and Employment Guidance Letter (TEGL) No. 5-08 (issued November 13, 2008) says that States must request a participant’s social security number when offering intensive WIOA services or providing financial assistance, however the State may not deny access to any participant who refuses to provide a social security number. Not obtaining an SSN from a participant means that any outcomes for this participant would be excluded from performance measures unless supplemental information is available to verify the performance outcomes for non-wage based measures.

It is important for service providers to request the applicant’s SSN at intake and advise them that their social security numbers are maintained in a secure and confidential manner. Applicants should also be advised that the State only uses the SSN for the following: a. Payment of wages and allowances, even though at intake it may not be possible to determine the form of payment, if any, the applicant will receive; and b. Tracking Unemployment Insurance Wage Records for the calculation of program performance measure outcomes. According to Federal reporting requirements a valid SSN must be obtained and recorded prior to termination and record transmittal. The regulations further state that The Department (USDOL) assumes full responsibility for protecting the confidentiality of the data and will ensure that data files are maintained according to applicable Federal laws, with particular emphasis upon compliance with the provisions of the Privacy Act and the Freedom of Information act. It will remove SSN from participant files before they are shared with Federal agencies and other users." All recipients of WIOA Title IB funds are governed by these requirements.

ADULT AND DISLOCATED WORKER SERVICES AND ACTIVITIES The Workforce Innovation and Opportunity Act provides for two levels of services beyond basic career services for adults and dislocated workers; individualized career and training services.

A. Basic Career Services Basic career services are universally available to everyone entering the facility. Other partner sites need only provide the career services appropriate to their participants and funding source. 1. Pre-enrollment Services Pre-enrollment services include all self-help services and basic career services requiring minimal staff assistance including: a. Determinations of eligibility to receive assistance under WIOA Title I; b. Outreach, intake (which may include worker profiling), and orientation to the information and other services available through the one-stop delivery system; 2. Orientation All individuals entering or re-entering services are to be oriented to the program. Required information for the orientation is the participant’s rights and procedures for filing grievances and claims of discrimination. Additional topics for orientation may include: a. An introduction to the program -- purpose and goals; b. Rules and regulations of the program; c. Provider responsibilities; d. Participant responsibilities; e. Program resources and supportive services available; f. Job-related injury procedures; and g. Wage and pay information.

While participants who have previously been enrolled in the program may not need an extensive orientation, they still need to be oriented briefly on all areas and especially on any program changes.

Orientation must include information and documented acknowledgement of procedures for complaints, grievances, and discriminatory practices. Documentation that the applicants/participants have received information regarding the above-mentioned procedures is the completed two-part "Equal Opportunity is the Law" participant discrimination form. One copy of this document must be maintained in the participant file and one must be provided to the applicant/participant. 3. Initial assessment of skill levels, aptitudes, abilities, and supportive service needs; 4. Provision of employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas. Labor Market Information (LMI) must be provided to
participants in every program. LMI generally encompasses four major areas: a. National job trends, including supply and demand. b. Local job opportunities. c. Education and skill requirements for jobs. d. Job seeking skills (writing resumes, job interview techniques, etc.).

LMI can be obtained from the CTHires system once a participant creates an account or from the State of CT Department of Labor Office of Research at: http://www1.ctdol.state.ct.us/lmi/index.asp

5. Provision of performance information and program cost information on eligible providers of: a. Training services; b. Adult education; c. Post-secondary vocational education; d. Vocational education activities available to school dropouts under Carl Perkins; e. Vocational Rehabilitation program activities. 6. Provision of information regarding how the local area is fulfilling performance measures and any additional performance information with respect to the one-stop delivery system in the local area; 7. Provision of accurate information relating to the availability of supportive services including child care and transportation available in the local area, and referral to such services, as appropriate; 8. Provision of information regarding filing claims for unemployment compensation; 9. Assistance in establishing eligibility for: a. Welfare-to-work activities available in the local area; and b. Programs of financial aid assistance for training and education programs that are not funded under WIOA and are available in the local area; 10. Computer Resources; 11. Resource Room use; 12. Open Workshops; 13. Job search and placement assistance, and where appropriate, career counseling; 14. Provide information on follow-up services that may be available to participants, as appropriate, including counseling regarding the workplace, for participants in workforce innovation and opportunity activities authorized under this subtitle who are placed in unsubsidized employment, for not less than 12 months after the first day of the employment, as appropriate; 15. Rapid Response – may only be used by Job Service Workforce Center staff or agency that receives Rapid Response funds. 16. One-Stop Services B. Individualized Career Services 1. Priority Groups Individualized career services are available to adults and dislocated workers who are members of a priority group (see Section 3.10 for adult, dislocated worker and veterans' priority of service); and a. are unemployed and are unable to obtain employment through basic career services provided; and b. have been determined to be in need of more individualized services in order to obtain employment; or c. are employed, but have been determined to be in need of individualized career services in order to obtain or retain employment that leads to self-sufficiency.

2. Individualized career services include: a. Comprehensive and specialized assessments of the skill levels and service needs, which may include: (1) Diagnostic testing and use of other assessment tools; and (2) In-depth interviewing and evaluation to identify employment barriers and appropriate employment goals. b. Development of an individual employment plan (IEP) to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve the employment goals; c. Group counseling; d. Individual counseling and career planning; e. Case management for participants seeking training services; (No proof of ETP needed if not paying tuition) f. Short-term pre-vocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct, to prepare individuals for unsubsidized employment or training; g. Work Experience/Internships; h. Adult Basic Education/Financial Literacy Services.

C. Moving from Individualized Career to Training Services To move from individualized career services to training services there must be significant development of the IEP that indicates training is necessary for the individual to obtain or retain employment leading to self-sufficiency.
The individuals must receive, at a minimum: 1. a completed IEP as described above; and 2. a comprehensive and specialized assessment of skill levels and service needs; or 3. group and/or individual employment counseling; or 4. case management and career planning.

D. Training Services Training services means any WIOA-funded and non-WIOA funded training service. Individuals with other employment issues shall be afforded opportunities for participation in training activities designed to improve participation in the workforce and lead to higher earnings for individuals who successfully complete them. Training activities for persons in these groups will be provided in the context of the state’s vision to provide universal access for all customers. 1. Training Services may be provided to adults and dislocated workers: a. Who have met the eligibility requirements for individualized career services and who are unable to obtain or retain employment through such services; b. Who after an interview, evaluation, or assessment, and case management, have been determined to be in need of training services and to have the skills and qualifications to participate successfully in the selected program of training services; c. Who select programs of training services that are directly linked to the employment opportunities in the local area involved or in another area in which individuals receiving such services are willing to relocate; and d. Who are unable to obtain other grant assistance for such services, including Federal Pell Grants; or e. Require assistance beyond that made available under other grant assistance programs, including Federal Pell Grants; and who are determined to be eligible in accordance with the priority for services criteria and the service provider’s determination of funds available to provide the service.

Training services may be provided under this paragraph to an individual who otherwise meets the requirements of this paragraph while an application for a Federal Pell Grant is pending, except that if such individual is subsequently awarded a Federal Pell Grant, the training provider must reimburse the service provider the WIOA funds used to pay the tuition portion of the training costs from the PELL Grant. WIOA Regs. 20 CFR Part 680.230(c) and WIOA Sec. 134 (c)(3)(B) NOTE: Tuition is the sum charged for instruction. Fees, books, supplies and other training related expenses are not considered tuition. Training services shall be provided through providers listed on the Department of Labor and Industry Eligible Provider List (ETPL) unless noted otherwise in the following list of training services. Out-of-state and on-line training provider programs must be on their state’s ETPL; and, if not on that state’s list, the service provider must determine why not. If the provider has been determined not eligible by another state, then they cannot be added to Connecticut’s ETPL, and cannot be used as a training provider. If there is another reason they are not on their state’s list (i.e. an overly cumbersome application process, etc.) then, they can be added to Connecticut’s ETPL through the normal application process. ETPL printout shall be documented in the participant’s file.

2. Training services may include: a. Occupational skills training, including training for nontraditional employment and for training programs operated by the private sector; (requires ETP) b. On-the-job training; (does not require ETP) c. Programs that combine workplace training with related instruction, which may include cooperative education programs; (requires ETP) d. Training programs operated by the private sector; (requires ETP) e. Skill upgrading and retraining; (requires ETP) f. Entrepreneurial training; (requires ETP) g. Job readiness training; (does not require ETP) h. Adult education and literacy activities provided in combination with services described in any of clauses (i) through (vii) of WIOA Section 134 (d)(4); (does not require ETP) i. Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training. (does not require ETP) j. Short-term pre-vocational training that is generally one week (40 hours) or less which does not provide certification or a credential upon completion. (does not require ETP) NOTE: WIOA funding may be used for training that leads to a goal of self-employment. 3. Training Payments The service provider must verify and pay tuition and other training costs in accordance with the training provider’s documented payment policy or terms.
WIOA funding may be used for any expenses considered to be part of the Cost of Attendance (see Section 4.60, D) that cannot be met from the PELL or other grant assistance. In situations of co-enrollment with other WIOA or non-WIOA programs (e.g. TAA, etc.), the case manager will coordinate with the training provider and other program(s) to ensure the participant’s training needs are met and there is no duplication of services. WIOA funding shall always be a supplement to other grant assistance.

YOUTH SERVICES AND ACTIVITIES

A. Youth Activities The United States Department of Labor (USDOL) is committed to providing high quality services for youth and young adults beginning with career exploration and guidance, continued support for educational attainment, opportunities for skill training in in-demand industries and occupations, and culminating with a good job along a career pathway or enrollment in post-secondary education.

The Workforce Innovation and Opportunity Act of 2014 emphasized the importance of coordination among Federally-funded employment and training programs, including those authorized under WIOA Title I and II. Many disconnected youth ages 16 to 24 meet eligibility requirements for both WIOA Title I youth activities and WIOA Title II adult education. Co-enrollment between these two programs can be very beneficial to disconnected youth as they can receive work experience and occupational skills through Title I funding and literacy skills through Title II funding. Because the eligibility for Title II is similar to that for an OSY under Title I, an individual who is not enrolled or required to be enrolled in secondary school under State law, it is consistent to consider such youth already enrolled in Title II as an OSY for purposes of Title I WIOA youth eligibility.

B. Youth Required Elements The following 14 elements must be available to youth participants. Service providers have the discretion of what specific services are provided to a youth, based on the individual’s Objective Assessment and Individual Service Strategy. (Refer to WIOA Youth Glossary on DLI website for definitions of the 14 required elements) 1. Tutoring, study skills training and instruction leading to secondary school completion, including dropout prevention strategies; 2. Alternative secondary school offerings; 3. Paid and unpaid work experiences that have academic and occupational education as a component of the work experience: > Summer employment opportunities and other employment opportunities available throughout the school year; > Pre-apprenticeship programs; > Internships as defined in § 680.170 of the regulations and job shadowing; and > On-the-job training opportunities; 4. Occupational skill training with priority consideration for training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations; 5. Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster; 6. Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors; 7. Supportive services; 8. Adult mentoring for the duration of at least 12 months that may occur both during and after program participation; 9. Follow-up services for not less than 12 months after the completion of participation; 10. Comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth; 11. Financial literacy education; 12. Entrepreneurial skills training; 13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area*, such as career awareness, career counseling, and career exploration services; and 14. Activities that help youth prepare for and transition to post-secondary education and training. WIOA Regs. 20 CFR Part 681.460
§ 681.490 What is adult mentoring? (a) Adult mentoring for youth must:

(1) Last at least 12 months and may take place both during the program and following exit from the program;

(2) Be a formal relationship between a youth participant and an adult mentor that includes structured activities where the mentor offers guidance, support, and encouragement to develop the competence and character of the mentee; and

(3) While group mentoring activities and mentoring through electronic means are allowable as part of the mentoring activities, at a minimum, the local youth program must match the youth with an individual mentor with whom the youth interacts on a face-to-face basis.

(b) Mentoring may include workplace mentoring where the local program matches a youth participant with an employer or employee of a company.

§ 681.500 What is financial literacy education? The financial literacy education program element may include activities which:

(a) Support the ability of participants to create budgets, initiate checking and savings accounts at banks, and make informed financial decisions;

(b) Support participants in learning how to effectively manage spending, credit, and debt, including student loans, consumer credit, and credit cards;

(c) Teach participants about the significance of credit reports and credit scores; what their rights are regarding their credit and financial information; how to determine the accuracy of a credit report and how to correct inaccuracies; and how to improve or maintain good credit;

(d) Support a participant’s ability to understand, evaluate, and compare financial products, services, and opportunities and to make informed financial decisions;

(e) Educate participants about identity theft, ways to protect themselves from identity theft, and how to resolve cases of identity theft and in other ways understand their rights and protections related to personal identity and financial data;

(f) Support activities that address the particular financial literacy needs of non-English speakers, including providing the support through the development and distribution of multilingual financial literacy and education materials; (g) Support activities that address the particular financial literacy needs of youth with disabilities, including connecting them to benefits planning and work incentives counseling;

(h) Provide financial education that is age appropriate, timely, and provides opportunities to put lessons into practice, such as by access to safe and affordable financial products that enable money management and savings; and

(i) Implement other approaches to help participants gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by
using high quality, age-appropriate, and relevant strategies and channels, including, where possible, timely and customized information, guidance, tools, and instruction.

§ 681.510 What is comprehensive guidance and counseling? Comprehensive guidance and counseling provides individualized counseling to participants. This includes drug and alcohol abuse counseling, mental health counseling, and referral to partner programs, as appropriate. When referring participants to necessary counseling that cannot be provided by the local youth program or its service providers, the local youth program must coordinate with the organization it refers to in order to ensure continuity of service.

§ 681.520 What are leadership development opportunities? Leadership development opportunities are opportunities that encourage responsibility, confidence, employability, self-determination, and other positive social behaviors such as:

(a) Exposure to postsecondary educational possibilities;
(b) Community and service learning projects;
(c) Peer-centered activities, including peer mentoring and tutoring;
(d) Organizational and team work training, including team leadership training; training;
(e) Training in decision-making, including determining priorities and problem solving;
(f) Citizenship training, including life skills training such as parenting and work behavior;
(g) Civic engagement activities which promote the quality of life in a community; and
(h) Other leadership activities that place youth in a leadership role such as serving on youth leadership committees, such as a Standing Youth Committee.

§ 681.530 What are positive social and civic behaviors? Positive social and civic behaviors are outcomes of leadership opportunities, which incorporated by local programs as part of their menu of services. Positive social and civic behaviors focus on areas that may include the following:

(a) Positive attitudinal development;
(b) Self-esteem building;
(c) Openness to work with individuals from diverse backgrounds;
(d) Maintaining healthy lifestyles, including being alcohol- and drug-free;
(e) Maintaining positive social relationships with responsible adults and peers contributing to the well-being of one’s community, including voting;
(f) Maintaining a commitment to learning and academic success;
(g) Avoiding delinquency; and
Positive job attitudes and work skills.

§ 681.540 What is occupational skills training?

(a) The Department defines occupational skills training as an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels. Local areas must give priority consideration to training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in the local area. Such training must: (1) Be outcome-oriented and focused on an occupational goal specified in the individual service strategy; and (2) Be of sufficient duration to impart the skills needed to meet the occupational goal; (3) Lead to the attainment of a recognized postsecondary credential.

(b) The chosen occupational skills training must meet the quality standards in WIOA sec. 123.

§ 681.560 What is entrepreneurial skills training and how is it taught? Entrepreneurial skills training provides the basics of starting and operating a small business.

(a) Such training must develop the skills associated with entrepreneurship. Such skills may include, but are not limited to, the ability to:

(1) Take initiative; (2) Creatively seek out and identify business opportunities; (3) Develop budgets and forecast resource needs; (4) Understand various options for acquiring capital and the trade-offs associated with each option; and (5) Communicate effectively and market oneself and one’s ideas.

(b) Approaches to teaching youth entrepreneurial skills include, but are not limited to, the following:

(1) Entrepreneurship education that provides an introduction to the values and basics of starting and running a business. Entrepreneurship education programs often guide youth through the development of a business plan and also may include simulations of business start-up and operation. (2) Enterprise development which provides supports and services that incubate and help youth develop their own businesses. Enterprise development programs go beyond entrepreneurship education by helping youth access small loans or grants that are needed to begin business operation and by providing more individualized attention to the development of viable business ideas. (3) Experiential programs that provide youth with experience in the day-to-day operation of a business. These programs may involve the development of a youth-run business that young people participating in the program work in and manage. Or, they may facilitate placement in apprentice or internship positions with adult entrepreneurs in the community.

LMI can be obtained from the CTHires system once a participant creates an account or from the State of CT Department of Labor Office of Research at: http://www1.ctdol.state.ct.us/lmi/index.asp

C. Youth Goals and Services Youth services are provided in conjunction with skill goals that may include any of the following services: 1. Basic Skills Goal 2. Occupational Skills Goal 3. Work Readiness Skills Goal 4. On-the Job Training 5. Customized Training 6. Work Experience 7. High School Equivalency Certificate Prep (Applies to youth 16 years and older)

D. Occupational Skills Training for Youth Occupational Skills Training is one of the 14 elements that are offered to youth participants. WIOA allows ITAs for out-of-school youth, ages 18 to 24 using WIOA funds when appropriate.
Priority consideration must be given to training programs that lead to recognized post-secondary credentials that align with in-demand industry sectors or occupations in the local area. Such training must: (1) be outcome-oriented and focused on an occupational goal specified in the individual service strategy; (2) be of sufficient duration to impart the skills needed to meet the occupational goal; and (3) result in attainment of a recognized post-secondary credential.

The chosen occupational skills training must meet the quality standards in WIOA Law Sec. 123.

In order to receive Occupational Skills Training services the youth must receive, at a minimum: 1. a completed ISS as described above; and 2. a comprehensive and specialized assessment of skill levels and service needs; or 3. group and/or individual employment counseling; or 4. case management and career planning.

E. Training Services Training services means any WIOA-funded and non-WIOA funded training service. Individuals with other employment issues shall be afforded opportunities for participation in training activities designed to improve participation in the workforce and lead to higher earnings for individuals who successfully complete them. Training activities for persons in these groups will be provided in the context of the state’s vision to provide universal access for all customers. 1. Training Services may be provided to adults and dislocated workers: a. Who have met the eligibility requirements for individualized career services and who are unable to obtain or retain employment through such services; b. Who after an interview, evaluation, or assessment, and case management, have been determined to be in need of training services and to have the skills and qualifications to participate successfully in the selected program of training services; c. Who select programs of training services that are directly linked to the employment opportunities in the local area involved or in another area in which individuals receiving such services are willing to relocate; and d. Who are unable to obtain other grant assistance for such services, including Federal Pell Grants; or e. Require assistance beyond that made available under other grant assistance programs, including Federal Pell Grants; and who are determined to be eligible in accordance with the priority for services criteria and the service provider’s determination of funds available to provide the service.

Training services may be provided under this paragraph to an individual who otherwise meets the requirements of this paragraph while an application for a Federal Pell Grant is pending, except that if such individual is subsequently awarded a Federal Pell Grant, the training provider must reimburse the service provider the WIOA funds used to pay the tuition portion of the training costs from the PELL Grant. WIOA Regs. 20 CFR Part 680.230(c) and WIOA Law Sec. 134 (c)(3)(B)

NOTE: Tuition is the sum charged for instruction. Fees, books, supplies and other training related expenses are not considered tuition.

Training services shall be provided through providers listed on the Department of Labor and Industry Eligible Provider List (ETPL) unless noted otherwise in the following list of training services. Out-of-state and on-line training provider programs must be on their state’s ETPL; and, if not on that state’s list, the service provider must determine why not. If the provider has been determined not eligible by another state, then they cannot be added to Connecticut’s ETPL, and cannot be used as a training provider. If there is another reason they are not on their state’s list (i.e. an overly cumbersome application process, etc.) then, they can be added to Connecticut’s ETPL through the normal application process. ETPL printout shall be documented in the participant’s file.

2. Training services may include: a. Occupational skills training, including training for nontraditional employment and for training programs operated by the private sector; (requires ETP) b. On-the-job
training; (does not require ETP) c. Programs that combine workplace training with related instruction, which may include cooperative education programs; (requires ETP) d. Training programs operated by the private sector; (requires ETP) e. Skill upgrading and retraining; (requires ETP) f. Entrepreneurial training; (requires ETP) g. Job readiness training; (does not require ETP) h. Adult education and literacy activities provided in combination with services described in any of clauses (i) through (vii) of WIOA Section 134 (d)(4); (does not require ETP) i. Customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training. (does not require ETP) j. Short-term pre-vocational training that is generally one week (40 hours) or less which does not provide certification or a credential upon completion. (does not require ETP)

3. Training Payments Youth service providers The service provider must verify and pay tuition and other training costs in accordance with the training provider’s documented payment policy or terms. WIOA funding may be used for any expenses considered to be part of the Cost of Attendance (see Section 4.60, D) that cannot be met from the PELL or other grant assistance. In situations of co-enrollment with other WIOA or non-WIOA programs (e.g. TAA, etc.), the case manager will coordinate with the training provider and other program(s) to ensure the participant’s training needs are met and there is no duplication of services. WIOA funding shall always be a supplement to other grant assistance.

NOTE: WIOA funding may be used for training that leads to a goal of self-employment.

CASE MANAGEMENT AND CAREER PLANNING

I. ADULTS AND DISLOCATED WORKERS A. What is Career Planning? Career Planning means the provision of a client-centered approach in the delivery of services, designed to: 1. prepare and coordinate comprehensive employment plans, such as service strategies, for participants to ensure access to necessary workforce investment activities and services, using where feasible, computer-based technologies; and

2. provide job, education, and career counseling during program participation and after job placement. WIOA Law Sec. 3(8)

WIOA Adult and Dislocated Worker funded staff, provide case management services to all participants enrolled in Workforce Innovation and Opportunity Act Title I programs. Federal law identifies case management as follows: 1. Comprehensive and specialized assessment of skill levels and service needs through – a. Diagnostic testing and use of other assessment tools; and b. In-depth interviewing and evaluation to identify employment barriers and 2. Development of an individual employment plan to identify employment goals and objectives, and appropriate services needed to achieve those goals and objectives.

3. Information on training available in local and regional areas, information on individual counseling to determine which training is suitable training, and information on how to apply for such training.

3. Information on how to apply for financial aid, including referring participant to educational opportunity centers, and notifying participants that they may request financial aid administrators at institutions of higher education to use the administrators’ discretion under section 479A of such act (20 U.S.C. § 1087tt) to use current year income data, rather than preceding year income data, for determining the amount of need of the participant for Federal financial assistance under title IV of
such Act (20 U.S.C. §§ 1070 et seq.). 4. 5. Short-term prevocational services, including development of learning skills, communications skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare participants for employment or training.

6. Individual career counseling, including job search and placement counseling, during the period in which the participant is receiving services, and after receiving services for purposes of job placement.

7. Provision of employment statistics information, including the provision of accurate information relating to local, regional, and national labor market areas, including – a. Job vacancy listings in such labor market areas; b. Information on jobs skills necessary to obtain jobs identified in job vacancy listings described in subparagraph (a); c. Information relating to local occupations that are in demand and earnings potential of such occupations; and d. Skills requirements for local occupations described in subparagraph (c).

8. Information relating to the availability of supportive services as described in Section 4.100 of the WIOA policy manual.

B. Case Management Responsibilities In addition to the defined case management identified above, case managers are responsible for – • Providing testing of basic skills, comprehensive assessment and testing; • Co-enrolling in all applicable programs as appropriate; • Maintaining consistent contact with participants as appropriate; and, if unable to make contact after repeated attempts in a 90 day period, closing all services and enrollments effective the date the services were last provided; • Developing and continually updating of an Individual Employment Plan (IEP) or Individual Service Strategy (ISS); • Determining if participant requests for training services and supportive or other services are allowable, appropriate and able to be funded; • Coordinating joint training plans and employment services as appropriate; • Monitoring the progress of participants in their approved plan; • Recording all program services and case notes in CTHires within the required timelines and as service/contact occurs, reflecting any significant issues or changes; • Maintaining the participant file (paper file); • Ending the participant’s services and program enrollment when services are no longer being provided; • Ensuring that participants are aware of their responsibilities as noted in C.

C. Participant Responsibilities • Obtaining prior approval for any type of service or assistance from the WIOA Program; • Informing case manager of progress; • Informing case manager of changes (address, phone number, classes or training, personal situations, etc.) in a timely manner (as it is happening, not weeks/months later). • Informing case manager of problems in any area (training, personal, financial, etc.) that could impact successful completion of their approved plan; • Informing case manager of work status; • Timely submitting copies of grades, certifications, diplomas, registration schedule, bills, receipts, etc.

II. YOUTH Case management services are to be made available to youth participants enrolled in Workforce Innovation and Opportunity Act Title I programs. Case management includes: 1. Comprehensive and specialized assessment of skill levels and service needs through – a. Diagnostic testing and use of other assessment tools; and b. In-depth interviewing and evaluation to identify barriers to education and/or employment.

2. Development of an Individual Service Strategy (ISS) to identify career and education goals and objectives, and appropriate services needed to achieve those goals and objectives.
3. Provision of any or all of the 14 WIOA services (described in Youth Section 3.20) to youth participants based on assessments and the ISS. Information on how to apply for financial aid, including referring participant to educational opportunity centers, and notifying participants that they may request financial aid administrators at institutions of higher education.

5. Short-term prevocational services, including development of learning skills, communications skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct to prepare participants for employment or training.

6. Individual career counseling, including job search and placement counseling, during the period in which the participant is receiving services, and after receiving services for purposes of job placement.

7. Information relating to the availability of supportive services as described in Section 4.100 of the WIOA policy manual. § 681.460 What services must local programs offer to youth participants? (a) Local programs must make each of the following 14 services available to youth participants:

(1) Tutoring, study skills training, instruction and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential;

(2) Alternative secondary school services, or dropout recovery services, as appropriate;

(3) Paid and unpaid work experiences that have academic and occupational education as a component of the work experience, which may include the following types of work experiences:

(i) Summer employment opportunities and other employment opportunities available throughout the school year; (ii) Pre-apprenticeship programs; (iii) Internships and job shadowing; and (iv) On-the-job training opportunities;

(4) Occupational skill training, which includes priority consideration for training programs that lead to recognized postsecondary credentials that align with in-demand industry sectors or occupations in the local area involved, if the Local WDB determines that the programs meet the quality criteria described in WIOA sec. 123;

(5) Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;

(6) Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors;

(7) Supportive services, including the services listed in § 681.570;

(8) Adult mentoring for a duration of at least 12 months, that may occur both during and after program participation;

(9) Follow-up services for not less than 12 months after the completion of participation, as provided in § 681.580;
10. Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth;

11. Financial literacy education;

12. Entrepreneurial skills training;

13. Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and training.

14. Activities that help youth prepare for and transition to postsecondary education and (b) Local programs have the discretion to determine what specific program services a youth participant receives, based on each participant’s objective assessment and individual service strategy. Local programs are not required to provide every program service to each participant.

(c) When available, the Department encourages local programs to partner with existing local, State, or national entities that can provide program element(s) at no cost to the local youth program.

B. Case Management Responsibilities In addition to the case management identified above, case managers are responsible for – • Providing testing of basic skills, comprehensive assessment and testing; • Co-enrolling in all applicable programs as appropriate; • Maintaining consistent contact with participants as appropriate; and, if unable to make contact after repeated attempts in a 90 day period, closing all services and enrollments effective the date the services were last provided; • Maintaining an updated Individual Service Strategy (ISS); • Determining if participant requests for supportive services are allowable, appropriate and able to be funded; • Coordinating co-enrollments as appropriate; • Monitoring the progress of participants in their ISS; • Recording all program services and case notes in ConnecticutWorks within the required timelines and as service/contact occurs, reflecting any significant issues or changes; • maintaining the participant file (paper file); • End the participant’s services and program enrollment when services are no longer being provided; • Providing follow-up services for a minimum of 12 months; and • Ensuring that participants are aware of their responsibilities as noted in C. C. Participant Responsibilities • Participating in the development and planning of their Individual Service Strategy (ISS); • Taking an active role in working toward attainment of the goals developed on the ISS; • Obtaining prior approval for any type of service or assistance from the WIOA Program; • Informing case manager of progress; • Informing case manager of changes (address, phone number, classes or training, personal situations, etc.) in a timely manner (as it is happening, not weeks/months later). • Informing case manager of problems in any area (training, personal, financial, etc.) that could impact successful completion of their approved plan; • Informing case manager of work status; • Timely submitting copies of grades, certifications, diplomas, registration schedule, bills, receipts, etc.

WORK EXPERIENCE (WEX)

I. ADULTS AND DISLOCATED WORKERS A. General Description Work Experience is a planned, structured learning experience that takes place in a worksite for a limited period of time that is based upon the needs of the participant. A work experience worksite may be in the private for-profit sector, the non-profit sector or the public sector. Work Experience is an authorized career services activity for WIOA Adults and Dislocated Workers.
Youth providers refer to II. Youth Work Experience for instructions specific to the WIOA Title I youth program.

WIOA Work Experience may be full-time or part-time depending upon the needs of the participant. Work Experience shall be designed to enhance the employability of individuals through the development of good work habits and basic work skills. Work Experience shall be limited to persons needing assistance in becoming accustomed to basic work requirements, including basic work skills, or those needing to explore new career options due to recent layoffs or declining job growth in their current or most recent employment. Work Experience may be used as a Situational Assessment. A Situational Assessment provides a participant with the opportunity to explore different work interests and try out their skills and abilities in a work setting. In addition, it allows the program staff and the participant to jointly determine the social aspects, work culture, and physical and communication requirements of the worksite. This determination provides valuable information on the job supports needed by the participant to achieve a successful job match. Work Experience participation creates an employer/employee relationship. Normally, the WIOA service provider establishing the worksite is considered the employer and pays the participant’s wages along with necessary taxes and workers’ compensation costs. In some cases, the worksite employer can be considered the employer and would then be responsible for the payment of wages, taxes and workers’ compensation. In these situations, the service provider reimburses the worksite employer through an invoice process. Regardless of who is considered the employer, the activity must comply with all applicable employment laws and regulations as noted in Section B.


Exclusions: Connecticut state law excludes work-training programs such as WIOA work experience from the definition of employment for purposes of unemployment insurance compensation (UI). Therefore, Work Experience wages are not subject to payment of UI taxes by the employer and WEX participants do not earn wage credits during their participation.

C. Participant Wages, Benefits, Hours of Work and Duration of Assignment Work Experience Wages. Work Experience participants shall be paid an hourly wage for hours worked which may be in ¼ hour increments. Wages are considered a work-training or educational allowance. Wage Rate. Each participant will receive a wage based on: a. Applicable federal and state minimum wage; or b. At the same rates as trainees or employees who are in similar occupations, and who have similar training, experience and skills within that worksite, whichever is higher. (WIOA 181(a)(1)(A)) Tax Withholding. Work Experience wages are subject to withholding for Social Security, Federal Income Tax, and Connecticut State Income Tax. Therefore participants must complete a W-4 and the employer must issue a W-2. Transportation and/or supportive services, if paid, are over and above wages and are not subject to tax deduction. Injury – Providers are to ensure that each WEX participant is covered by State Workers’ Compensation Insurance or adequate injury insurance. Hours of Work – Work Experience participants can only be paid for the actual hours worked. Participants may not be paid when they are out sick on vacation or for holidays regardless of the worksite policy regarding holiday pay. Full-time participation is defined as working 32-40 hours per week, or the same number of hours worked by regular employees at the worksite, not to exceed 40 hours per week. Neither overtime work nor overtime pay are allowable. Part-time Work Experience is encouraged, when appropriate, for older workers, the disabled, single parents with small children, or
individuals in other similar circumstances. Duration of WEX Assignment – Work Experience is to be for a limited time that is reasonable in duration. The length of the Work Experience assignment is to be based on the needs of the participant and purpose of placing that participant in a WEX. Factors such as prior work experience and occupational interests should be taken into consideration. Generally, a WEX assignment should not exceed 600 hours and may be shorter than that depending upon the participant. Providers wishing to establish or extend a WEX in excess of the 600 hour duration must get prior approval from the WIOA Program Manager.

D. Worksite Supervision Service providers should visit participants and their supervisors at their worksites on a bi-weekly basis to assist in job-related or personal counseling and job coaching. The performance and progress of the participant is to be monitored on a regular basis to determine if continued participation, transfer to another activity, and placement in unsubsidized employment, or other action is most appropriate.

E. Required Work Experience Documents Standard Work Experience (service provider as employer): A Memorandum of Agreement (MOA) and Training Summary must be completed prior to the placement of participants at a worksite. The MOA (WIOA.21) sets forth the intent of the activity. The Training Summary (WIOA.21F) outlines the work elements, duties and skills for which the participant will receive training or perform during the WEX activity assignment.

Only one agreement per worksite is required per program year and slots are open entry/open exit and can be refilled as participants are transferred to other activities.

Alternative Work Experience (worksite as the employer): A Memorandum of Agreement (WIOA.21) Training Summary (WIOA.21F), Agreement Work Experience Wage Subsidy Agreement (WIOA.21C) must be completed prior to the placement of a participant at the worksite. WEX Wage Subsidy situations are specific to an individual participant, so new paperwork must be completed with each participant placed at a worksite. Reimbursement to the worksite employer will be done using the Work Experience Wage Subsidy Invoice (WIOA.21D).

All time sheets requirements listed under the Standard Work Experience apply to participants on an Alternative Work Experience.

All participants on a WEX must complete a time sheet at the end of the scheduled work period. The job duties and tasks that the participant performed must be completed on the Work Experience Time Sheet (WIOA.21G) for each day worked and must tie to the work elements, duties and tasks listed on the Training Summary. Time sheets must be signed and dated by both the participant and the supervisor. The supervisor must be listed on Training Summary as authorized to sign time sheets. Time sheets must be completed with days, dates, hours, duties documented, signed and dated before a participant can be paid.

Union Concurrence: Following an informal consultation with the appropriate labor organization, the Union Concurrence Form (WIOA.21B) is to be completed for each agreement where a collective bargaining agreement covers the occupation the participant(s) are to be placed in. A copy of the Union Concurrence Form must be kept with each MOA whether or not a collective bargaining agreement exists. A note on the Union Concurrent Form such as N/A is sufficient when there is no collective bargaining agreement. The Union Concurrent Form should always have the signature of the worksite authorized signatory regardless of whether or not there is a collective bargaining agreement in place.
Training Summary: A training summary must be completed for each job that will be performed at a Worksite. The original training summary must be attached to the worksite MOA and a copy placed in each of the participant’s file that will be maintained with the appropriate timesheets for that placement.

One training summary may be used and attached to the MOA if several participants are placed in the same occupation (using the same O’NET Code) on a worksite. Additional sheets to list the participants may be attached to the Training Summary.

* The Training Summary must be completed by identifying the participant and employer (worksite); supervisor(s) that are authorized to sign timesheets and a phone number; occupation and the O’NET Code; Wage per hour and hours of work per week; the WEX start and end dates (not estimated but actual end date); a list of the skills, duties and tasks for which the participant will receive training; check yes or no for initial skills and the actual training hours. Timesheets: All participants on a WEX must complete a time sheet at the end of the scheduled work period. The job duties and tasks that the participant performed must be completed on the WIOA Adult Work Experience Time Sheet for each day worked and must tie to the work elements, duties and tasks listed on the WIOA Adult Training Summary. * Time sheets must be completed with pay period dates, dates and hours worked, and duties documented; * Time sheets must be signed and dated by both the participant and the supervisor; * The supervisor must complete the evaluation section of the timesheet; * The individual signing as the supervisor must be listed on Training Summary as authorized to sign time sheets; Time sheets must be complete with dates, duties, supervisor evaluation, and signed and dated before a participant can be paid.

II. YOUTH Work Experience is a critical WIOA youth program element. Work experience helps youth understand proper workplace behavior and what is necessary in order to attain and retain employment. Work experience can serve: (1) as a stepping stone to unsubsidized employment; and (2) is an important step in the process of developing a career pathway for youth. According to research, work experience is correlated with higher high school graduation rates and success in the labor market. This is particularly important for youth with disabilities. (Preamble, WIOA Regulations)

Work experiences are designed to enable youth to gain exposure to the working world and its requirements; help youth acquire the personal attributes, knowledge, and skills needed to obtain a job and advance in employment. A. Work Experience Expenditures Local youth programs must expend not less than 20 percent of funds allocated to them to provide in-school and out-of-school youth with paid and unpaid work experience. This includes wages, staff costs for the development and management of the Work Experience. B. Work Experiences for Youth § 681.590 1. Work experience must include academic and occupational education. Education offered concurrently and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster. (WIOA Law Sec. 129(c)(2)(E)) The new program element requires integrated education and training to occur concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement. Youth participants are not required to master basic academic skills before moving on to learning career-specific technical skills. (TO BE RESEARCHED AND DEFINED FOR CLARIFICATION) § 681.600 2. The types of work experiences include the following categories: a. Summer employment; b. opportunities and other employment c. opportunities available throughout the school year; d. Pre-apprenticeship programs; e. Internships and job shadowing; and f. On-the-job training opportunities as defined in WIOA Sec. 3(44) and in WIOA Regs. 20 CFR Part 680.700.
C. Employment Law & Work Experience Requirements

Work Experience placements must:

- Comply with the Fair Labor Standards Act in regards to wages paid, hours worked and child labor regulations.
- Complete an I-9 in accordance with the Immigration Reform and Control Act.
- Provide Workers’ Compensation coverage.

Exclusions: Youth that have been in a paid Work Experience may not claim unemployment insurance. Connecticut state law excludes work-training programs such as WIOA work experience from the definition of employment for purposes of unemployment insurance compensation (UI). Therefore, Work Experience wages are not subject to payment of UI taxes by the employer and WEX participants do not earn wage credits during their participation. MCA 39-51-204 (1)(m).

D. Participant Wages, Benefits, Hours of Work and Duration of Assignment

Work Experience Wages. Work Experience participants shall be paid an hourly wage for hours worked which may be in ¼ hour increments. Wages are considered a work-training or educational allowance. Wage Rate. Each participant will receive a wage based on:

a. Applicable federal and state minimum wage; or
b. At the same rates as trainees or employees who are in similar occupations, and who have similar training, experience and skills within that worksite, whichever is higher. (WIOA 181(a)(1)(A))

c. Providers are not restricted to paying minimum wage for a youth work experience and may pay the youth a higher wage based on wages in the community and are commiserate with other employees at the worksite doing the same job but not more than the other employees doing the same job. Tax Withholding. Work Experience wages are subject to withholding for Social Security, Federal Income Tax, and Connecticut State Income Tax. Therefore participants must complete a W-4 and the employer must issue a W-2. Transportation and/or supportive services, if paid, are over and above wages and are not subject to tax deduction. Injury - Providers are to ensure that each WEX participant is covered by State Workers’ Compensation Insurance or adequate injury insurance. Hours of Work – Work Experience participants can only be paid for the actual hours worked. Participants may not be paid when they are out sick on vacation or for holidays regardless of the worksite policy regarding holiday pay. Participants may work part-time or full-time in a Work Experience depending on service provider funding and the number of youth in a WEX. Full-time participation is defined as working 32-40 hours per week, or the same number of hours worked by regular employees at the worksite, not to exceed 40 hours per week. Neither overtime work nor overtime pay is allowable. Child labor laws must be observed when scheduling work hours for youth under 18 years of age. Duration of WEX Assignment – The length of the Work Experience assignment is to be based on the needs of the participant and purpose of placing that participant in a WEX. E. Worksite Supervision

Service providers should visit participants and their supervisors at their worksites on a bi-weekly basis to assist in job-related or personal counseling and job coaching. The performance and progress of the participant is to be monitored on a regular basis to determine if continued participation, transfer to another activity, and placement in unsubsidized employment, or other action is most appropriate. Timesheets: All participants on a WEX must complete a time sheet (WIOA.22D) at the end of the scheduled work period. The job duties and tasks that the participant performed must be completed on the WIOA Youth Work Experience Time Sheet for each day worked and must tie to the work elements, duties and tasks listed on the WIOA Youth Training Summary. Time sheets must be completed with pay period dates, dates and hours worked, and duties documented; Time sheets must be signed and dated by both the participant and the supervisor; The supervisor must complete the evaluation section of the timesheet; The individual signing as the supervisor must be listed on Training Summary as authorized to sign time sheets; Time sheets must be complete with dates, duties, supervisor evaluation, and signed and dated before a participant can be paid.
Facsimile and instructions for the Memorandum of Agreement, Training Summary, Union Concurrence, Wage Subsidy Agreement and Wage Subsidy Invoice forms (only applies when the provider is paying the worksite and not the participant) are in the Forms Section on DLI's WIA website. The provider’s copy of the appropriate WEX documents (Training Summary, Timesheet and Bi-Weekly Contact Record) must be attached together and kept in the provider’s office with a copy in each participant’s file. The provider may choose to maintain Work Experience MOAs in the participant’s file or in a separate binder.

F. CTHires – All work experience(s) should be data entered and tracked using the CThires system as activities.

§ 680.180 What is an internship or work experience for adults and dislocated workers? For the purposes of WIOA sec. 134(c)(2)(A)(xii)(VII), an internship or work experience is a planned, structured learning experience that takes place in a workplace for a limited period of time. Internships and other work experience may be paid or unpaid, as appropriate and consistent with other laws, such as the Fair Labor Standards Act. An internship or other work experience may be arranged within the private for profit sector, the non-profit sector, or the public sector. Labor standards apply in any work experience setting where an employee/employer relationship, as defined by the Fair Labor Standards Act, exists. Transitional jobs are a type of work experience, as described in §§ 680.190 and 680.195.

§ 680.190 What is a transitional job? A transitional job is one that provides a time-limited work experience, that is wage-paid and subsidized, and is in the public, private, or non-profit sectors for those individuals with barriers to employment who are chronically unemployed or have inconsistent work history, as determined by the Local WDB. These jobs are designed to enable an individual to establish a work history, demonstrate work success in an employee-employer relationship, and develop the skills that lead to unsubsidized employment. § 680.195 What funds may be used for transitional jobs? The local area may use up to 10 percent of their combined total of adult and dislocated worker allocations for transitional jobs as described in § 680.190. Transitional jobs must be combined with comprehensive career services (see § 680.150) and supportive services (see § 680.900). § 680.340 What are the requirements for consumer choice? (a) Training services, whether under ITAs or under contract, must be provided in a manner that maximizes informed consumer choice in selecting an eligible provider.

(b) Each Local WDB, through the one-stop center, must make available to customers the State list of eligible training providers required in WIOA sec. 122(d). The list includes a description of the programs through which the providers may offer the training services, and the performance and cost information about those providers described in WIOA sec. 122(d). Additionally, the Local WDB must make available information identifying eligible providers as may be required by the Governor under WIOA sec. 122(h) (where applicable).

(c) An individual who has been determined eligible for training services under § 680.210 may select a provider described in paragraph (b) of this section after consultation with a career planner. Unless the program has exhausted training funds for the program year, the one-stop center must refer the individual to the selected provider, and establish an ITA for the individual to pay for training. For purposes of this paragraph, a referral may be carried out by providing a voucher or certificate to the individual to obtain the training.

(d) The cost of referral of an individual with an ITA to a training provider is paid by the applicable adult or dislocated worker program under title I of WIOA.
(e) Each Local WDB, through the one-stop center, may coordinate funding for ITAs with funding from other Federal, State, local, or private job training programs or sources to assist the individual in obtaining training services.

(f) Consistent with paragraph (a) of this section, priority consideration must be given to programs that lead to recognized postsecondary credentials (defined at WIOA sec. 3(52)) that are aligned with in-demand industry sectors or occupations in the local area.

**ON-THE-JOB TRAINING (OJT) § 680.200**

A. Description OJT is training by an employer that is provided to a paid participant while engaged in productive work in a job that provides knowledge or skills essential to the full and adequate performance of the job.

OJT is an important training services activity whereby employers provide necessary equipment and training for jobs by means of a "hire first, train later" strategy. WIOA participants who successfully complete the OJT period are subsequently retained in permanent employment. The OJT should to be used for occupations in higher skills categories. It is not subsidized employment of low-skill occupations, which require very little training time. OJT is only appropriate for the length of time necessary to be trained in the specific occupation.

OJT may be sequenced with or accompanied by other types of services such as occupational, pre-vocational or literacy training. § 680.350 May title I adult and dislocated worker funds be used to directly support adult education and literacy activities?

Yes, under WIOA sec. 134(c)(3)(D)(x), title I funds may provide adult education and literacy activities if they are provided concurrently or in combination with one or more of the following training services:

(a) Occupational skills training, including training for nontraditional employment;

(b) OJT;

(c) Incumbent worker training (as described in §§ 680.780, 680.790, 680.800, 680.810, and 680.820);

(d) Programs that combined workplace training and related instruction, which may include cooperative education programs; (e) Training programs operated by the private sector;

(f) Skill upgrading and retraining; or

(g) Entrepreneurial training.

OJT contracts may be written for either full-time or part-time employment. Contracts written for occupations identified on the Office of Apprenticeship (OA), USDOL or the Connecticut apprenticeable occupations list should, with the knowledge and approval of the employer, be coordinated with the Apprenticeship Unit of the CT Department of Labor.
Personnel involved in the decision making process to place an eligible participant into an OJT must document the decision in the participant’s Individual Employment Plan or Individual Service Strategy. The decision should demonstrate that the training chosen is appropriate, that the training is necessary, that the participant does not already possess the skills, or that the individual needs to upgrade their skills to move to a new job.

Reverse Referrals (see Glossary) may be accepted for OJT only if the participant’s assessment and IEP/ISS document such OJT as an appropriate training activity. The employer must be aware that an individual not currently in their employ may or may not be referred back for employment consideration. OJT contracts written for eligible employed workers do not constitute a reverse referral.

B. Eligibility § 680.700, § 680.710 OJT contracts may be written for WIOA eligible employed workers when: 1. The employee is not earning a self-sufficient wage as determined by policy; 2. The requirements in WIOA regulations, 20 CFR Part 680.700(b), contracts may not be made with an employer that exhibits a pattern of failure to provide participants long-term employment as well as wages and benefits; and the contract must be limited to the period of time required for a participant to become proficient in the occupation for which the training is provided; and 3. The OJT relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes.

C. Reimbursement and Contract Requirements § 680.720 Reimbursements under OJT contracts are deemed to be compensation for the extraordinary costs associated with training participants and the costs associated with the lower productivity of the participants. The standard reimbursement rate for OJT contracts is up to 50%. § 680.730 An OJT contract reimbursement rate may be up to 75% if a higher rate is justified based on one or more of the following factors: (I) the characteristics of the participant (e.g. long-term unemployed, little or no work history, physical or mental disability, ex-felon); (II) the size of the employer (50 or fewer employees); (III) the quality of employer-provided training and advancement opportunities; (IV) the training is in an apprenticeable occupation and the employer has agreed to sponsor a registered apprenticeship. WIOA Law Sec. 134(c)(3)(H)(ii) 1. Training that is not considered appropriate includes, but is not limited to: a. Occupations in lower wage industries where prior skill or training is not prerequisite for hiring; b. Occupations with high labor turnover; c. Occupations, which lead to relocation of establishments from one area to another; d. Seasonal occupations; e. Occupations with a substantial number of experienced and able workers who are presently unemployed; f. Occupations dependent on tips and/or commission to equal the minimum wage; and g. Occupations with low paying, dead-end jobs.

2. Contractor Eligibility a. OJT assistance will be available only in industries providing job continuity or security; b. Any firm or industry in violation of local, state or federal labor laws is not eligible for training assistance; c. Any firm, employer or industry who has had two (2) or more OJT contracts and has exhibited a pattern of failure to provide OJT participants continued, long-term employment as regular employees with wages and working conditions at the same level and to the same extent as similarly situated employees are ineligible to enter into further WIOA OJT contracts. (See Glossary for definition of "Pattern of OJT Contract Failure") WIOA Law Sec. 194(4) d. Relocation (1) No funds provided under the Act shall be used, or proposed for use, to encourage or to induce the relocation of an establishment, or part thereof, that results in the loss of employment for any employee or such establishment at the original location. (2) For 120 days after the commencement or the expansion of commercial operations of a relocating establishment, no funds provided under this Act shall be used for customized or skill training, on-the-job training, or company-specific
assessments of job applicants or employees, for any relocating establishment or part thereof at a new, or expanded location, if the relocation of such establishment or part thereof results in a loss of employment for any employee of such establishment at the original location. (3) For the purposes of this section, relocating establishment means a business entity, including a successor-in-interest, which is moving any operations from a facility in one labor market area within the United States and its territories to a new or expanding facility in another labor market area. For the purposes of this section, a labor market area is an area within which individuals can readily change employment without changing their place of residence. WIOA Law Sections 3(30) and 181(d); 29 CFR Part 683.255

(4) Pre-award review. To verify that an establishment is expanding or not relocating employment from another area, the program operator shall conduct a pre-award review to ensure that the company has not relocated and the relocation resulted in layoffs or displacement of workers. Service providers shall use the OJT Pre-Award Review form (WIOA.24) to document this process. A facsimile of OJT Pre-Award Review form is in the forms section of this manual. e. Approval. Before writing an OJT contract, service providers shall determine that abnormal labor conditions such as a strike, a lockout or similar conditions do not exist at the establishment or its affiliates; f. Established Wages - industries not meeting the established wage priorities are not eligible; g. Prevailing Standards - occupations must meet prevailing standards with respect to wages, hours and conditions of employment; h. Reimbursements (1) WIOA funds shall not be provided to reimburse OJT training costs when the participant was referred and hired through a private employment agency and was required to pay a referral and placement fee; (2) Training costs will be an allowable WIOA expenditure if the employer paid the referral and placement fee; i. Training Contracts may be with the private or public sector.

3. Contract Period OJT contracts should be written for a period of time that takes into account actual training time plus additional time to anticipate unexpected time away from training by the participant. This process should ensure that end date of the contract is sufficiently into the future so as not to require a contract modification to extend the end date. (NOTE: This is the contract period, not the training time.) 4. Length of Training OJT training authorized for a participant shall be limited to a period not in excess of that generally required for the acquisition of skills needed for the particular occupation. For the purpose of this section, training shall not exceed a maximum of 1040 hours. The following procedures will apply to determine the maximum number of reimbursable weeks of training for an occupation: a. O*NET - The Occupational Information Network Locate the title of the occupation in the O*NET and identify the occupation’s 5 or 6-digit occupational code. For example, Receptionist and Information Clerks: 43-4171 b. Job Zone Determination Process (1) Using the O*NET code, find the Job Zone level in the O*NET (Example: 43-4171 = Job Zone - 2) (2) Then locate the Job Zone on the chart below. It shows maximum OJT time reimbursable for any occupation at a given Job Zone. For example, Receptionist: 43-4171.00 has a Job Zone of 2. Read across to see that 800 hours is the maximum for any Job Zone 2 occupation.

JOB ZONE-TRAINING TIME CONVERSION CHART Job Zone Level Maximum Training Allowed 1 400 hours 2 800 hours 3 *1,200 hours 4 *1,600 hours 5 *2,080 hours *Occupations with a Job Zone of 3 or higher cannot exceed 1040 hours duration.

5. Employee/Trainee Wages a. Minimum Starting rate The minimum starting rate of OJT employees shall be the greater of: • Applicable federal and state minimum wage; or • At the same rates as trainees or employees similarly situated in similar occupations by the same employer, and who have similar training, experience and skills, whichever is higher. WIOA Sec. 181(a)(1)(A)
b. Wage Rate Calculations • In cases where the OJT is for a salaried position, an hourly rate of pay should be calculated for reimbursement purposes by taking the gross monthly salary, multiplied by 12 then divided by 2080 hours (e.g. $2,600 x 12 = $31,200/2080 = $15). NOTE: With salaried positions, be sure that paid time off (i.e. vacation, sick, holiday, PTO) is accounted for in the Weekly Work Logs and not reimbursed. • In cases where the trainee may receive two different rates of pay (e.g. regular rate and shift differential for evening/weekend hours), calculate the maximum contract amount based on the best estimation of the trainee's schedule during the contract. On the monthly invoice, breakout the training hours and reimbursement for each rate of pay on a separate line. Note: WIOA funds shall not be used for overtime wages, holidays, sick leave, or vacations.

6. Apprenticeable Occupations When training is proposed for apprenticeable occupations, the provider should, with the knowledge and approval of the employer, consult with the appropriate apprenticeship representative regarding the coupling of training with apprenticeship programs. The purpose is to provide individuals who receive OJT training with the opportunity to participate in a structured training program that lasts beyond the limits of the WIOA OJT training, and provides for an incremental increase in wages.

8. Program Standards And Cost Guidelines For OJT Contracts a. "Hire First" Principle means that employers must agree to hire prior to training for all entry-level positions. NOTE: This does not mean that the employers can "try out" or work the trainee for a period of time prior to contract funding to see if the trainee will work out. This means: (1) The employer "hires" the participant as of the entry date into the OJT program; (2) The participant is considered to be an employee, not a trainee, of the contractor; (3) The participant is entitled to all the rights and benefits of all regular employees; and (4) The employer has made a commitment to provide continued employment after training. b. Trainee Entrance Schedule All employees should enter training within a one-month period of the funding date on the contract. c. Contract Assembly An OJT contract contains the following: (1) OJT Pre-Award Review (2) Concurrence (3) On-the-Job Training Contract (4) Special Terms and Provisions/Assurances and Certifications (5) OJT Training Summary (6) Apprenticeship Notification

9. Referral and Hire No participant will be started in a proposed OJT slot until a contract has been negotiated and signed. After negotiation of the OJT contract referral of eligible trainees may begin.

A copy of the OJT Contract is to be given to the employer and the participant. The provider will maintain the original contract.

10. Reports a. OJT Monthly Invoice This report is to be completed monthly for each contract. The initial progress report will be completed for the month in which the contract is approved regardless of reportable activity. Each report will cover each cumulative activity under a specific contract. The final report should be completed for the month in which the scheduled training days are completed. When used for payment, this report must be completed within five (5) days of contract completion/termination. Do not wait until the end of the month. The report is kept on file with the provider.

The service provider will make a monthly visit to the contractor to complete the OJT Monthly Invoice. The provider must review the employer records to ensure all information entered on the Monthly Report is accurate. The provider should obtain a copy of the record to attach to the monthly invoice for backup documentation. The record may be a time card or any other document that the employer is using to document hours worked during the month. On the date of the visit, employer and the provider must sign and date the OJT Invoice. The signatures will certify that the information on the
invoice is correct and is reflective of the employer records, including hours worked and wages paid. Note: Signatures may not always be the employer per se, but a qualified person in the employer’s office may sign, as long as the qualifier’s signature is also on the original contract.

Original signatures must be used on the Monthly OJT Invoice. Signed invoices may not be altered with whiteout or correction tape.

b. OJT Monthly Service Report This report is used with the OJT Monthly Invoice. Providers will make a monitoring/assistance visit to the contractor worksite on a regular monthly basis. Contacts with the trainee will also be made at that time.

During these visits the provider will complete the OJT Monthly Invoice and OJT Monthly Service Report. Regular visits will provide providers an opportunity to provide services or assistance to the employer and participant that may prevent major problems or deficiencies from occurring. Any problems or deficiencies that may be uncovered during a visit should be outlined in the provider’s Evaluation and/or Corrective Action section of the OJT Monthly Service Report. Also any corrective action plans should be included.

c. Weekly Work Log During the monthly visit, providers will collect documentation from the participant on what they have been learning during the past month. There are a variety of ways in which providers can do this. One way would be to collect a copy of the daily work log that apprentices are required to keep for their program, or providers develop their own log for participants to keep, or use the WIOA.26A Weekly Work Log. Providers will then compare the weekly work log to the contract to ensure that the participant is getting the training required for the job.

D. OJT Contract Modification 1. Contract modifications must be in writing. 2. The contractor or the provider may initiate a contract modification. 3. Signed contracts are not to be altered with whiteout or correction tape. Changes may only be made by a modification, or if that is not possible, by lining out the incorrect data, hand printing the new data and by having both parties initial the change. 4. Copies of the modifications should be distributed to all parties who have copies of the original contract.

E. Time Limitations No person may participate in OJT in excess of the time generally required for acquisition of skills needed for the position within a particular occupation. The Occupational Information Network (O*NET) codes gives direction for determining the appropriate training time.

CUSTOMIZED TRAINING A. Description § 680.760 Customized Skills Training is designed to meet the special requirements of an employer or a group of employers by allowing them to tailor and design work-based skills training. Customized training is conducted with a commitment by the employer to employ, or in the case of incumbent workers, continue to employ, an individual on successful completion of the training. [Note: an incumbent worker must still meet the statutory definition of either adult or dislocated worker to receive customized training]. § 680.780 Employers may be reimbursed by the WIOA program for the costs incurred in providing the training including staff/instructor time or training materials.

Customized Skills Training can be provided after a WIOA participant is hired or if an employer makes a commitment to hire the participant upon successful completion of the training.

B. Requirements § 680.770 Customized training may be provided for an employer or group of employers when: 1. The employee is not earning a self-sufficient wage (there is currently no State
established self-sufficiency wage). 2. The employer, or group of employers, have made the commitment to employ or continue to employ, an individual that has successfully completed the program; and 3. The customized training relates to the introduction of new technologies, introduction to new production or service procedures, upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes.

C. General Guidelines 1. For each participant, the employer develops the training plan and measurable goals and determines the method by which the training is provided. Proficiency levels should be based on local business or industry skill standards. 2. The training activity may take place at the worksite or in a classroom setting. The employer or an intermediary may provide the training.

E. Time Limitations Training should be for a specified length of time and may take place at the worksite or in a classroom.

INDIVIDUAL TRAINING ACCOUNTS (ITA) A. Description Individual Training Accounts are established on behalf of the participant. WIOA Title IB Adult, Dislocated Worker and Older Youth (18 or older) participants will use ITAs to purchase training services from eligible providers they select in consultation with the case manager or case manager.

Individual Training Account services may be made available to employed and unemployed adults and dislocated workers who have met the eligibility requirements for Individualized Career services, and have been determined to be unable to obtain or retain employment leading to self-sufficiency through such services. Youth are not required to receive Individualized Career services as a condition for the ITA.

The participant must have a completed IEP or ISS that indicates that, through interview, evaluation or assessment, the participant has been determined to be in need of training and has the necessary skills and qualifications to successfully complete the selected training program.

Selection of a training program must include the identification that the training is directly linked to occupations that are in demand in the local area, or in another area to which an adult or dislocated worker is willing to relocate. In determining local demand occupation(s), providers may allow for training in occupations that may have high potential for sustained demand or growth in the local area.

Participants may select training programs in religious activities/occupations provided the training costs are covered through an ITA, the training meets the requirements in Section 1.30 Administrative Standards part H. and the training provider is on the Eligible Training Provider List.

Participants may select training that leads to self-employment in a particular occupation provided the training costs are covered through an ITA and the training provider is on the Eligible Training Provider List. As noted in Section 1.30 Administrative Standards part J. d., WIOA funding cannot be used for business start-up costs.

Start-Up Costs. Costs associated with the start-up of businesses are not considered allowable under the provisions of WIOA Law Section 181. Start-up costs associated with entrepreneur training would also fall under this prohibition. This prohibition will also apply to the start-up costs of an agency that would provide services to WIOA clients. However, the purchase of equipment (with appropriate prior approval) will continue to be an allowable cost.
B. Limitations on who can receive training services

1. Training services may be made available to employed and unemployed adults, dislocated workers and youth (age 18 or older) who: (a) A case manager or case manager determines, after an interview, evaluation, or assessment, and career planning, are: (1) Unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services; (2) In need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and (3) Have the skills and qualifications to participate successfully in training services;

(b) Have selected a program of training services that is directly linked to the employment opportunities in the local area or the planning region, or in another area to which the individuals are willing to commute or relocate; (c) Are unable to obtain grant assistance from other sources to pay the costs of such training, including such sources as State-funded training funds, Trade Adjustment Assistance, and Federal Pell Grants established under title IV of the Higher Education Act of 1965, or require WIOA assistance in addition to other sources of grant assistance, including Federal Pell Grants (provisions relating to fund coordination are found at WIOA 20 CFR Part 680.230 and WIOA Sec. 134(c)(3)(B)); and (d) If training services are provided through the adult funding stream, are determined eligible in accordance with the State and local priority system, if any, in effect for adults under WIOA 20 CFR Part 680.600 and WIOA Sec. 134(c)(3)(E).

2. Service providers and training providers must coordinate funds available and make funding arrangements with partner agencies so that WIOA ITA funds supplement Pell and other grant sources to pay for the cost of training (see D. re: Cost of Attendance).

3. Participants may enroll in ITA funded training while their application for a Pell Grant is pending provided that the service provider has made arrangements with the training provider and the participant regarding the allocation of the Pell Grant, if it is subsequently awarded. If a Pell Grant is awarded, the training provider must reimburse the service provider the ITA funds used to underwrite the tuition portion of the training costs from the PELL Grant.

4. Service providers should consider all available sources of funds, excluding loans, in determining an individual’s overall need for WIOA funds. Resources such as PELL, GI Bill and other federal grants should not be included in calculations of the level of WIOA assistance until the grant has been awarded.

5. Reimbursement is not required from the portion of Pell Grant assistance disbursed to the participant for education-related expense. Note: Tuition is the sum charged for instruction and does not include fees, books, supplies, equipment and other training related expenses.

C. Duration, Cost Limits and Availability

1. Currently, there is no monetary limit or cap on ITAs; nor is there a limit on the length of the training. Service providers should keep in mind that the intent of WIOA is to get participants trained and into the workforce as quickly as possible. Training that can be completed within a few years or even shorter timeframe is the standard expectation. If a participant is requesting a longer training program, service providers should consult with a program manager. Service providers are to base the amount of the ITAs and duration of the training on each eligible participant’s needs and circumstances and the availability of program funds; with the goal to serve as many individuals as possible with the funding available. 2. ITAs are awarded per semester, quarter or for uninterrupted training coursework. Second and subsequent ITAs will be awarded only for continuing classes in the educational or training institution initially attended, unless there is mutual and justifiable agreement between the service provider and the participant that another
training institution or training program is necessary. 3. An individual who has been determined eligible for an ITA may select a training institution and program from the Connecticut Eligible Training Provider List (ETPL) or from another State, provided that the training institution and program is listed on that State’s Eligible Training Provider List, after consultation with a case manager or case manager. Unless the program has exhausted funds for the program year, the Service provider must refer the individual to the selected training program, and establish an ITA for the individual to pay for training. WIOA Regs. 20 CFR Part 680.340 4. Payments may not be made to a training provider until the service provider ensures that the training provider and program selected is on the Eligible Training Provider list at time of payment for tuition and fees under WIOA ITAs.

D. Payment system Individual Training Accounts are designed to identify WIOA funded costs associated with the training cost of attendance. The Cost of Attendance may include tuition, fees, room and board, books, supplies, and tools (if required for the training course). The ITA identifies the WIOA obligation for the participant and the participant will be able to access information about the account from the Service provider. Each service provider is responsible for maintaining an ITA payment system which ensures that payments made to Eligible Training Providers are timely, for the agreed upon amount, ensuring that the provider is on the ETPL at time of payment and that the payments are supported by appropriate documentation. [Note: Cost of Attendance may also include other expenses that are not incurred through the training provider such as child care, transportation, rent and other living expenses. WIOA service providers should take into account the full cost of participating in training services, including the cost of support services and other appropriate costs. WIOA funds may be used to assist with such expenses and are considered supportive services] Financial responsibility for ITAs remains with the service provider who developed the ITA, in consultation with the participant, throughout the period of training, regardless of the location of the training provider. The financial responsibility of the service provider also extends to supportive services.

E. Retakes of required classes WIOA funds may be used to pay for retakes of required classes if there is sufficient justification that has been documented by the case manager. Examples of justifiable reasons to pay for a retake would be the requirement to attain a specific grade to advance to higher level coursework in the training program; or circumstances beyond the participant’s control such as an unforeseen health issue. Service providers should consult with a program manager if they are uncertain about funding a specific retake request.

F. Documentation Contact between the case manager or case manager, and the participant must occur, at a minimum, at the end of each quarter, semester or uninterrupted training course during the lifetime of the training plan. Contact may be made by telephone, through the mail, personal contact or other appropriate means to provide documentation of successful progress. Documents such as attendance records, grade reports, and statements from the instructing agency, are required as proof of participation and satisfactory academic progress. If the documentation indicates the participant is having problems, the case manager should maintain more frequent contact. Documentation of status of the provider, either Connecticut’s ETPL or another State’s list, must be maintained in the participant’s file.

ELIGIBLE TRAINING PROVIDERS

The Workforce Investment Act (WIA) established the Eligible Training Provider process as part of an overall strategy to ensure informed customer choice for training, performance accountability, and continuous improvement. The Workforce Innovation and Opportunity Act (WIOA) further advances
these goals through the alignment of the six primary federal programs that support employment and training services: Title I Adult, Dislocated Worker, and Youth Programs, Adult Education and Literacy Programs, the Wagner-Peyser Employment Service, and Title I of the Rehabilitation Act programs.

Connecticut’s Eligible Training Provider List (ETPL) identifies training providers whose performance qualifies them to receive WIOA funds to train adults and dislocated workers using Individual Training Accounts (ITAs). The Connecticut ETPL and related eligibility procedures ensure the accountability, quality, and labor-market relevance of programs of training services that receive funds through WIOA. WIOA outlines the responsibilities of the Governor and State agencies in creating and maintaining a list of eligible training providers.

A. Definitions

Eligible Training Provider is a provider of training services who has met the eligibility requirements to receive WIOA Title I Adult and Dislocated Worker funds to provide training services to eligible individuals. Eligible training providers may also receive Title I Youth funds through ITAs under certain conditions (see Section B, Training Providers Subject to ETPL Requirements).

§ 680.410 What is an eligible training provider?.

An ETP: (a) Is the only type of entity that receives funding for training services, as defined in § 680.200, through an individual training account;

(b) Must be included on the State list of eligible training providers and programs under this subpart;

(c) Must provide a program of training services; and

(d) Must be one of the following types of entities:

(1) Institutions of higher education that provide a program which leads to a recognized postsecondary credential; (2) Entities that carry out programs registered under the National Apprenticeship Act (29 U.S.C. 50 et seq.;) or (3) Other public or private providers of training services, which may include:

(i) Community-based organizations, ii) Joint labor-management organizations; and(iii) Eligible providers of adult education and literacy activities under title II of WIOA if such activities are provided in combination with training services described at § 680.350.

Program of training services § 680.420 is defined as one or more courses or classes, or a structured regimen, which lead to:

1. A recognized post-secondary credential, secondary school diploma or its equivalent, 2. Employment, or 3. Measurable skill gains toward such a credential or employment.

A credential is awarded in recognition of an individual’s attainment of measurable technical or occupational skills necessary to obtain employment or advance within an occupation. These technical or occupational skills are generally based on standards developed or endorsed by employers. Please see the Policy Manual’s Section 4.90, Credentials for further information regarding credentials.
A pre-apprenticeship is a program or set of strategies designed to prepare individuals to enter and succeed in a registered apprenticeship program and has a documented partnership with at least one, if not more, registered apprenticeship program(s).

A program completer is a participant who meets all requirements of the training program.

A program exiter is a participant who left the program during the previous twelve month period for any reason (including completers).

B. Training Providers Subject to ETPL Requirements The following types of training providers are subject to the ETPL requirements in order to receive WIOA Title I Adult and Dislocated worker funds to provide training services to these participants through ITAs. ITAs may also be used for WIOA Title I Youth funds to provide training to older, out-of-school youth (ages 18-24).

1. Institutions of higher education that provide a program of training that leads to a recognized post-secondary credential; 2. Apprenticeship programs registered by the USDOL Office of Registered Apprenticeship; 3. Public or private training providers, including joint labor-management organizations, pre-apprenticeship programs, and occupational or technical training; and 4. Providers of adult education and literacy activities provided in combination with occupational skills training (e.g., the I-BEST model).

C. Initial Eligibility and Application Process § 680.450

Eligibility Factors

The Workforce Innovation and Opportunity Act (WIOA) includes certain criteria that must be met in order to ensure that a provider of programs offers the highest quality training services and is responsive to in-demand and emerging industries by providing training services for those industries (WIOA §122(b)(4)(A)). The entity shall provide verifiable program-specific performance information based on criteria established by the state (WIOA §122(b)(4)(C)) to support the entity’s ability to serve program participants. Pursuant to WIOA §122(b)(4)(D)(i-iv), an entity seeking initial eligibility as a provider of training services must meet the following criteria:

• A factor related to indicators of performance as described in WIOA §116(b)(2)(A)(i)(I-IV) as set by Connecticut Department of Labor ETPL policy.

For an entity’s initial eligibility under WIOA (first year), the entity must document that it meets at least one of the following by submitting performance data:

• Median Earnings (Quarterly basis) - $3,459.00 • Average Wage at Placement - $9,344.00 • Attainment of a Post-Secondary Credential - 60% • Completion Rate - 60% • Employment Rate - 65% • Training-related Employment Rate - 65%

For each program to be offered on the ETPL, documentation must include the program name and the most recent annual data that is available (for example, 7/1/14 - 6/30/15 or 7/1/15 - 6/30/16) for ALL individuals enrolled in the program for at least one of the factors above. The timeframe that the data is from must be stated on the documentation. If the program is new to the entity and historical data is not available, data must be tracked upon ETP approval and submitted in accordance with the requirements described at “Performance and Reporting.”
• A factor concerning whether the provider is in a partnership with business. Consideration for satisfying this factor will include active involvement (not just membership) in: a local Chamber of Commerce, the Connecticut Business and Industry Association (CBIA) or other local business association, Connecticut Workforce Development Board, Advisory Boards (colleges/universities), clinical partnership agreements, internships/externships with businesses, and affiliations with business associations. Submit a list of partnerships and describe the nature of the partnership.

• Other factors that indicate high-quality training services. If the applying entity is required by Connecticut statute to be approved by the Connecticut Office of Higher Education, State Department of Education, or Department of Public Health to offer training, this Eligibility Factor will be deemed as met. All other entities must comply with federal and state ETP credential policies in order for this (high-quality) Eligibility Factor to be deemed as met. In regard to a program’s credential outcome, ALL applying entities’ program offerings must result in credential attainment that complies with federal and state ETP credential policies in order for the program to be considered for approval.

• A factor concerning alignment of the training services with in-demand industry sectors and occupations. To satisfy this factor, review the in-demand occupations listed on CTDOL’s website, http://www1.ctdol.state.ct.us/lmi/projections.asp, and provide documentation from the site to verify the training service is specifically related to an in-demand industry sector or occupation. Otherwise, provide information and documentation to show the extent to which the training service(s) aligns with the in-demand industry sectors and occupations displayed on this CTDOL website. In-demand occupations may vary at the local level; applying providers may consult with the lead WDB.

C. Performance and Reporting The Workforce Innovation and Opportunity Act (WIOA) includes certain performance and reporting requirements.

Approval as a WIOA provider requires your agreement that your entity’s ETP approval is contingent upon meeting the state minimum criteria for performance, pursuant to the requirements of the Workforce Innovation and Opportunity Act. Such criteria will include program completion rates, entered employment/placement rates, placement wages, and any other performance indicators established by CTDOL. Eligible training providers will be required to report to CTDOL, in the format prescribed by CTDOL, all applicable program performance and cost information for ALL individuals enrolled in a program, for the periods prescribed by CTDOL, which periods will also include some quarters following program exit. This performance data will be made available to the public on-line at CTDOL’s ETPL website in accordance with federal and state law. Further, approval as a WIOA provider requires your agreement to release all student information for relevant placement and past performance in other areas.

G. Exceptions to the ITA and ETPL Requirements There are several exceptions to the required use of an ITA for training. In situations covered by these exceptions, a contract for services may be used to provide for training in lieu of the ETPL process. 1. On-the-job training, customized training, incumbent worker training, internships, paid or unpaid work experience, and transitional employment are not included in the eligible training provider list and therefore are not subject to the eligibility requirements. 2. Where the State Workforce Innovation Board (SWIB) determines there are an insufficient number of eligible providers in the local area to accomplish the purpose of an ITA. The State plan and policy must describe how this determination was made and the process used for contracting for services. 3. If the SWDB determines that a community-based organization (CBO) or nonprofit whose primary mission is to serve individuals with barriers to employment provides effective training services. The SWDB must develop criteria in policy to determine that the program is effective. 4. Training for multiple individuals in high-demand industry sectors or occupations, as
long as the contract does not limit the individual’s consumer choices. 5. Circumstances in which a pay-for-performance contract is appropriate, if the SWDB chooses to utilize this strategy.

Registered apprenticeship programs are not subject to the application or performance reporting requirements. Any apprenticeship program may remain on the ETPL as long as it remains registered by the USDOL Office of Registered Apprenticeship.

H. Conditions for Removal from the ETPL § 680.470

The State may remove a program or programs from the list for failing to meet the established criteria or performance levels in this policy, or for not providing all required performance information for subsequent eligibility. Removal is also appropriate if the program has failed to attain or lost the accreditation required for professional licensure. A training provider that is removed from the list for reasons stated above may reapply for continued eligibility when they can demonstrate that they meet all requirements.

Any providers that willfully supply false performance information, misrepresent costs or services, or substantially violate requirements of WIOA law will be removed from the ETPL by the State for a period of not less than two years. Providers are liable to repay all adult, dislocated worker, and youth funds received during the period of non-compliance.

No training provider debarred by the Federal Government may be permitted to be placed or remain on the ETPL.

In the case of a training provider or a program of training services that is removed from the list while WIOA participants are enrolled, the participants may complete the program unless the provider or program has lost state licensing, certification, or authorization to operate by the appropriate state oversight agency.

§ 680.480 May an eligible training provider lose its eligibility?

(a) Yes. A training provider must meet the Governor’s requirements for eligibility and provide accurate information in order to retain its status as an eligible training provider.

(b) Providers determined to have intentionally supplied inaccurate information or to have substantially violated any provision of title I of WIOA or the WIOA regulations, including 29 CFR part 38, must be removed from the State list of eligible training providers and programs in accordance with the enforcement provisions of WIOA sec. 122(f). A provider whose eligibility is terminated under these conditions must be terminated for not less than 2 years and is liable to repay all youth, adult, and dislocated worker training funds it received during the period of non-compliance. The Governor must specify in the procedures which individual or entity is responsible for making these determinations and the process by which the determination will be made, which must include an opportunity for a hearing that meets the requirements of § 683.630(b) of this chapter.

(c) As a part of the biennial review of eligibility established by the Governor, the State must remove programs of training services that fail to meet criteria established by the Governor to remain eligible, which may include failure to meet established minimum performance levels. Registered apprenticeship programs only may be removed for the reasons set forth in § 680.470. (d) The Governor must establish an appeals procedure for providers of training services to appeal a denial of
eligibility under this subpart that meets the requirements of § 683.630(b) of this chapter, which explains the appeals process for denial or termination of eligibility of a provider of training services.

(e) Where a Local WDB has established higher minimum performance standards, according to § 680.430(e), the Local WDB may remove a program of training services from the eligible programs in that local area for failure to meet those higher performance standards. Training providers may appeal a denial of eligibility under § 683.630(b) of this chapter.

I. Appeal Process Training providers can choose to appeal the rejection of their program for inclusion on the ETPL, or its subsequent termination of eligibility. For any appeal by a training provider, an appeal must be submitted in writing via email to : within 14 days after notification of the decision. The appeal must include the justification for the appeal in their request. The training provider also has the right to request a hearing to discuss their appeal.

The appeals procedure will allow for a hearing if requested and a decision will be made within 60 days of appeal. This will be a final decision and the program will be unable to reapply through the ETPL eligibility process for one year from the date of final notification by the State.

J. Short-term Prevocational Training Short-term Prevocational Training of approximately one week or less which does not provide an industry-recognized certification or a credential upon completion shall not require application to become an Eligible Training Provider.

K. Required Performance Data § 680.490 The following information is required from eligible training providers in order to remain eligible:

1. Type and number of recognized postsecondary credentials received by all students. 2. Cost of attendance, including costs of tuition and fees for all participants in the program 3. Program completion rate for all students

The following demographic information is encouraged but is not required:


The following performance outcomes will be determined by the State based on the Social Security Numbers provided for each program, which will be matched to state wage data:

1. The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program. 2. The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program. 3. The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program. 4. The percentage of program participants who obtain a recognized post-secondary credential, or a secondary school diploma or its recognized equivalent during participation in or within one year after exit from the program.

L. Continued Eligibility Procedure

WIOA TRAINING PROVIDER APPEAL PROCESS
Appeal Procedures The Workforce Investment Act requires the Governor to establish procedures for providers of training services to appeal a denial of eligibility or termination of eligibility. 20 CFR Part 680.480(d) A. Basis for Appeal Eligible providers of training services may file an appeal due to: 1. Denial by the designated State Agency under WIOA Section 122 (b), (c), or (e); 2. Termination or eligibility or other action by the State Agency under WIOA Section 122(f); 3. Denial of eligibility as a provider of on-the-job training or customized training by a One-Stop operator under WIOA Section 122 (h). B. Filing an Appeal 1. Timeline for Filing an Appeal Appeals must be in writing and submitted within one hundred and eighty days (180) days of being notified of a denial or termination to: Connecticut Department of Labor Employment Services Director 200 Folly Brook Boulevard Wethersfield, CT 06109 2. The appeal must be signed by an authorized individual from the training provider and should include: a. Name of the training provider; b. Address and phone number of the training provider c. An explanation of why an appeal is being filed

Definition(s)

Days means consecutive calendar days, including weekends and holidays.

Workforce Development Area includes the WDB administrative entity and its subrecipients to which the administrative entity has delegated the complaint and grievance resolution process.

Complainant or Grievant means any participant or other personally interested or personally affected party alleging a noncriminal violation of the requirements of WIOA.

Grievance or complaint means a written expression by a party alleging a violation of WIOA, regulations promulgated under WIOA, recipient grants, subagreements, or other specific agreements under WIOA. All complaints, amendments, and withdrawals shall be in writing. These procedures are intended to resolve matters, which concern actions arising in connection with the WIOA Title I grant program.

Hearing Officer means an impartial party who shall preside at a hearing on a grievance or complaint.

Participant means an individual who has been determined to be eligible to participate in, and who is receiving services under a program authorized by WIOA.

Recipient means an entity to which a WIOA grant is awarded directly from DOL to carry out a program under Title I of WIOA.

Subrecipient means an entity, including service providers, to which a subgrant is awarded and which is accountable to the recipient (or higher tier subrecipient) for the use of the funds provided.

It is the policy of the CT Department of Labor that: • The principles and procedures set forth in this directive shall be used by all Connecticut WDB’s in the development of local-level grievance and hearing procedures including those for WDB staff as addressed in WDB personnel manuals; and • The principles and procedures set forth in this directive shall govern the treatment and handling of all grievances or complaints in connection with all WIOA Title I grant programs and activities conducted by the state, or pursuant (directly or indirectly) to subgrants from the state.

Procedures:
I. GENERAL PRINCIPLES AND REQUIREMENTS

These procedures will guide the receipt, hearing, and resolution of noncriminal grievances and complaints relating to WIOA Title I grant programs and activities that are funded with WIOA Title I grant monies provided to the state by USDOL. These procedures will be available for use by all individuals and entities, including WIOA Title I grant participants, WORKFORCE DEVELOPMENT AREA staff, subrecipients of WORKFORCE DEVELOPMENT AREAS, and other interested parties. Local procedures must include "a process which allows an individual alleging a labor standards violation to submit the grievance to a binding arbitration procedure, if a collective bargaining agreement covering the parties so provides." [Title 20 CFR Section 667.600(c)(3)]. Additionally, all Connecticut WORKFORCE DEVELOPMENT AREAs and subrecipients of WIOA Title I grant funds must make reasonable efforts to assure that information about the content of the grievance and complaint procedures will be understood by affected participants and individuals, including youth and those who are limited English-speaking individuals. Such efforts must comply with the language requirements of Title 29 CFR Section 37.35.

At all levels of the grievance or complaint process, complainants have the right to be represented, at their own expense, by a person(s) of their choosing. Grievances or complaints must be filed within one hundred and eighty (180) days of the alleged violation. All grievances or complaints, amendments, and withdrawals must be in writing. All persons filing grievances or complaints shall be free from restraint, coercion, reprisal, or discrimination.

II. WORKFORCE DEVELOPMENT AREA GRIEVANCE AND COMPLAINT PROCEDURES

Pursuant to Title 20 CFR Sections 667.600 through 667.610, the state requires WORKFORCE DEVELOPMENT AREAs to establish procedures for resolving grievances and complaints alleging a violation of WIA Title I, regulations, grants, or other agreements under WIA. The following outlines the procedures for resolving issues arising in connection with WIA Title I grant programs operated by each administrative entity for the WORKFORCE DEVELOPMENT AREAs or its subrecipients. Any participant or other interested party adversely affected by a decision or action by the local workforce system, including decisions by One-Stop partners and service providers, has the right to file a grievance or complaint with the WORKFORCE DEVELOPMENT AREA.

A. Notice to Affected Parties

Initial and continuing notice of the local grievance and complaint procedures and instructions on how to file a complaint must be: • posted in a public location and be made available to any interested parties and members of the public. • made available to each participant. A copy of a written description of the local grievance and complaint procedure shall include (1) notification that the participant has the right to file a grievance or complaint at any time within one hundred and eighty (180) days of the alleged violation; (2) instructions and timeline for filing a grievance or complaint; and (3) notification that the participant has the right to receive technical assistance. Such information shall be modified, as needed, whenever the procedures are changed. • included in each participant’s file. The participant shall sign a copy of acknowledgement of receipt.

The WORKFORCE DEVELOPMENT AREAs have the responsibility to provide technical assistance to the complainants, including those grievances or complaints against the WORKFORCE DEVELOPMENT AREAs. Such technical assistance includes providing instructions on how to file a grievance or complaint, providing relevant copies of documents such as the WIA, regulations, local rules, contracts, etc., and providing clarifications and interpretations of relevant provisions. This requirement shall not be interpreted as requiring WORKFORCE DEVELOPMENT AREAs to violate rules of confidentiality.

B. Form and Filing of Grievance or Complaint
The official filing date of the grievance or complaint is the date the written grievance or complaint is received by the WORKFORCE DEVELOPMENT AREAS, its service providers, One-Stop partners, or subrecipients. The filing of the grievance or complaint will be considered a request for a hearing, and the WORKFORCE DEVELOPMENT AREA shall issue a written decision within 60 days of the filing of the grievance or complaint.

The grievance or complaint must be in writing, signed, and dated. For resolution purposes, the state recommends that the WORKFORCE DEVELOPMENT AREAs obtain the following information for all complaints: • full name, telephone number, and mailing address of the complainant; • full name, telephone number, and mailing address of the respondent; • a clear and concise statement of the facts and dates describing the alleged violation; • the provisions of the WIA, the WIA regulations, grant, or other agreements under the WIA, believed to have been violated; • grievances or complaints against individuals, including staff or participants, shall indicate how those individuals did not comply with the WIA law, regulation, or contract; and • the remedy sought by the complainant.

The absence of any of the requested information shall not be a basis for dismissing the grievance or complaint.

A grievance or complaint may be amended to correct technical deficiencies at any time up to the time of the hearing. Grievances or complaints may not be amended to add new issues. The one hundred and eighty (180) day time period in which a grievance or complaint may be filed is not extended for grievances or complaints that are refiled with amendments. Grievances or complaints may be withdrawn at any time prior to the issuance of the hearing officer’s decision. The WORKFORCE DEVELOPMENT AREA shall send a copy of the grievance or complaint to the respondent.

C. Informal Resolution The WORKFORCE DEVELOPMENT AREA shall notify the complainant and the respondent of the opportunity for an informal resolution. Respondents must make good faith efforts to resolve all grievances or complaints prior to the scheduled hearing. Failure on the part of either party in the grievance or complaint to exert good faith efforts shall not constitute a basis for dismissing a grievance or complaint, nor shall this be considered to be a part of the facts to be judged in the resolution process. Where a complaint alleges a violation of WIOA Title I, grant or any agreements under WIA, the WORKFORCE DEVELOPMENT AREA must assure that every grievance or complaint not resolved informally or not withdrawn is given a hearing, regardless of the grievance or complaint’s apparent merit or lack of merit.

Should an individual allege a labor standards violation, and a pertinent collective bargaining agreement so provides, parties may submit the grievance to a binding arbitration procedure. Submission must occur during the informal resolution process.

When the complaint has been resolved through the informal resolution process, the WORKFORCE DEVELOPMENT AREA shall attempt to contact the complainant and have him or her provide a written withdrawal of the complaint within 10 days of the receipt of the notice of resolution or impasse where a complainant decides not to proceed to an administrative hearing. The WORKFORCE DEVELOPMENT AREA shall maintain copies of correspondence in the complainant’s file.

D. Notice of Hearing Hearings on any grievance or complaint shall be conducted within 30 days of filing of a grievance or complaint. The complainant and the respondent must be notified in writing of the hearing 10 days prior to the date of the hearing. The 10-day notice may be shortened with the written consent of both parties. The hearing notice shall be in writing and contain the following information: • the date of the notice, name of the complainant, and the name of the party against whom the grievance or complaint is filed; • the date, time, and place of the hearing before an impartial hearing officer; • a statement of the alleged violations. These statements must
accurately reflect the content of the grievance or complaint as submitted by the complainant. However, clarifying notes may be added to assure that the grievance or complaint is addressed accurately; • the name, address, and telephone number of the contact person issuing the notice.

E. Conduct of Hearings An impartial hearing officer shall conduct the hearing. The state suggests that WORKFORCE DEVELOPMENT AREAs seek impartial hearing officers from among the staff of legal offices or personnel departments of municipalities that will not be directly affected by, or will not implement the final resolution of, a specific grievance or complaint.

The hearing will be conducted in an informal manner with strict rules of evidence not being applicable and according to the procedures established by the WORKFORCE DEVELOPMENT AREAs. Both parties will have the right to present written and/or oral testimony and arguments; the right to call and question witnesses in support of their position; the right to examine records and documents relevant to the issues; and the right to be represented. The hearing will be recorded electronically or by a court reporter.

F. Decision Not later than 60 days after the filing of the grievance or complaint, the hearing officer shall mail a written decision to both parties by first class mail. The hearing officer’s decision shall contain the following information: • the names of the parties involved; • a statement of the alleged violation(s) and issues related to the alleged violation; • a statement of the facts; • the hearing officer’s decision and the reasons for the decision; • a statement of corrective action or remedies for violations, if any, to be taken; and • notice of the right of either party to request a review of the decision by the state within 10 days of the receipt of the decision.

G. Appeal If a complainant does not receive a decision at the WORKFORCE DEVELOPMENT AREA level within 60 days of the filing of the grievance or complaint, or either party receives an adverse decision, the party then has the right to file an appeal with the state within one hundred and twenty (120) days from the filing of the grievance or complaint.

The party may request a state hearing by submitting a written notice of appeal to:

Director of Employment and Training Connecticut Department of Labor 200 Folly Brook Boulevard Wethersfield, CT 06109

III. STATE-LEVEL GRIEVANCE AND COMPLAINT PROCEDURES

Title 20 CFR Section 667.600(d) requires the state to provide a process for dealing with grievances and complaints from participants or interested parties affected by the statewide workforce investment programs, resolving appeals of decisions issued at the WORKFORCE DEVELOPMENT AREA level, remanding grievances and complaints related to the local WIOA Title I programs to the WORKFORCE DEVELOPMENT AREA grievance process, and affording an opportunity for an informal resolution and a hearing to be completed within 60 days of the filing of the grievance or complaint.

A. State-Level Informal Resolution and Hearing Procedures

All complaints of noncriminal violations of the requirements of WIOA by the state, or complaints by individuals or interested parties affected by the statewide workforce investment program shall be filed in writing with the Director of Employment and Training. All requests for state hearings shall include the same basic elements necessary for local-level hearings. These are:
- full name, telephone number, and mailing address of the complainant; • full name, telephone number, and mailing address of the respondent;

• a clear and concise statement of the facts and dates describing the alleged violation; • the provisions of the WIA, the WIA regulations, grant, or other agreements under the WIA, believed to have been violated; • grievances or complaints against individuals, including staff or participants, shall indicate how those individuals did not comply with the WIA law, regulation, or contract; and • the remedy sought by the complainant. Upon receipt of the request for a state hearing, the Director of Employment and Training or his/her designee shall review the grievance or complaint and shall provide an opportunity for an informal resolution. The Director of Employment and Training shall notify the complainant and the respondent within 10 days of receipt of the grievance or complaint and proceed with the informal resolution process. If the state cannot resolve the grievance or complaint informally, then a hearing will be held.

Hearings on any grievance or complaint shall be conducted within 30 days of the filing of a grievance or complaint. The complainant and the respondent shall be notified in writing of the hearing 10 days prior to the date of hearing. The hearing notice shall advise the following:

• the date, time, and place of the hearing before an impartial hearing officer; • the pertinent sections of the WIA or any other federal regulations involved; • a statement of the alleged violations. These statements must accurately reflect the content of the grievance or complaint as submitted by the complainant. However, clarifying notes may be added to assure that the grievance or complaint is addressed accurately; • the name, address, and telephone number of the contact person issuing the notice.

B. Appeals of WORKFORCE DEVELOPMENT AREA Decisions or Requests for a CT Department of Labor Review

1. A complainant may file a request for review with the CT Department of Labor if no decision has been issued at the WORKFORCE DEVELOPMENT AREA level within the 60-day time limit or if there has been an incident of restraint, coercion or reprisal as the result of filing a grievance or complaint. A complainant may file an appeal if the WORKFORCE DEVELOPMENT AREA has issued an adverse decision. The request for a CT Department of Labor review or appeal shall be filed or postmarked (if mailed) within 10 days from the date on which either party received an adverse decision from WORKFORCE DEVELOPMENT AREA or 15 days from: • the date on which a complainant should have received a decision regarding a locally filed complaint, which is defined as five days from the date the decision was due, or • the date on which an instance of restraint, coercion or reprisal was alleged to have occurred as a result of filing the complaint.

2. All requests for review or appeals shall include the following:

• the full name, telephone number, and mailing address of the complainant; • the full name, telephone number, and mailing address of the WORKFORCE DEVELOPMENT AREA; • a statement of the basis of the request or appeal; and • copies of relevant documents, such as the complaint filed at the WORKFORCE DEVELOPMENT AREA and the local decision, if any. 3. If an evidentiary hearing was held at the WORKFORCE DEVELOPMENT AREA level, the CT Department of Labor shall request the record of the hearing from the WORKFORCE DEVELOPMENT AREA and shall review the record without scheduling an additional hearing. If an evidentiary hearing was not held at the WORKFORCE DEVELOPMENT AREA level, the CT Department of Labor shall instruct the WORKFORCE DEVELOPMENT AREA to hold a hearing within 30 days of receipt of the appeal or request for a CT Department of Labor review. If the WORKFORCE DEVELOPMENT AREA refuses to hold a hearing within the required timeframe, the CT Department of Labor shall, within 30 days of
receipt of the appeal or request for hearing, schedule an evidentiary hearing before a hearing officer. The Director of Employment and Training shall notify the concerned parties and the WORKFORCE DEVELOPMENT AREA by first class mail, certified with a return receipt, of the following information at least 10 days before a scheduled hearing:

• the date of the notice, name of the complainant, and the name of the party against whom the complaint is filed; • the date, time, and place of the hearing before a hearing officer; • a statement of the alleged violations. This statement shall accurately reflect the content of the complaint as submitted by the complainant; • the name, address, and telephone number of the contact person issuing the notice.

C. Hearing

1. The CT Department of Labor hearing shall be conducted in an informal manner with strict rules of evidence not being applicable. Both parties shall have the right to present written and/or oral testimony under oath and arguments; the right to call and question witnesses; the right to request and examine records and documents relevant to the issues, and the right to be represented. The hearing shall be recorded electronically or by a court reporter.

2. Parties may file with the Hearing Officer written arguments in lieu of closing arguments within five (5) days of the close of the hearing.

D. CT Department of Labor Commissioner Decision

1. Following completion of the CT Department of Labor hearing, or submission of written closing arguments, the CT Department of Labor hearing officer shall issue a proposed decision which the Commissioner of Labor may adopt or modify as a final decision, or direct the hearing officer to conduct further proceedings. The hearing officer’s proposed decision shall contain the following information:

• the names of the parties involved; • a statement of the alleged violation(s) and issues related to the alleged violation; • a statement of the facts; • the hearing officer’s proposed decision and the reasons for the decision; and • a statement of the proposed corrective action, if any, to be taken.

2. The Commissioner of Labor shall not conduct a new evidentiary hearing, but shall review the record established by either the WORKFORCE DEVELOPMENT AREA hearing or the CTDOL hearing officer. The Commissioner of Labor shall issue a decision on the basis of the information contained in the record. The Commissioner of Labor may accept, reject, or modify the hearing officer’s proposed decision of the WORKFORCE DEVELOPMENT AREA, and shall issue a written decision to the concerned parties within 60 days of receipt by the CT Department of Labor of the request for hearing or review.

3. The Commissioner of Labor shall mail a written decision to both the complainant and the respondent by certified mail. The decision shall contain the following information:

• the names of the parties involved; • a statement of the alleged violation(s) and issues related to the alleged violation; • a statement of the facts; • the Commissioner’s decision and the reasons for the decision; • a statement of the corrective action, if any, to be taken; and • a notice of the right of either party to file an appeal to the Secretary of Labor.

E. Referral of Local Grievances or Complaints
Grievances or complaints filed directly with the state related to the local WIA programs will be remanded to the local area grievance process in accordance with WORKFORCE DEVELOPMENT AREA Grievance and Complaint Procedures.

F. Remedies 1. Remedies that may be imposed for a violation of any requirement under WIOA Title I shall be limited to:

- suspension or termination of payments under WIOA Title I;
- prohibition of placement of a participant with an employer that has violated any requirement under WIA Title I;
- reinstatement, where applicable, of an employee, payment of lost wages and benefits, and reestablishment of other relevant terms, conditions, and privileges of employment; and
- where appropriate, to other equitable relief.

2. Nothing in paragraph 1 shall be construed to prohibit a complainant or grievant from pursuing a remedy authorized under another federal, state, or local law for a violation of WIOA Title I.

G. Federal-Level Appeal Process Under Title 20 CFR Section 667.610(a)(1), if the state has not issued a decision within the required 60-day time limit, the complainant can file an appeal to the Secretary of Labor. The appeal must be filed with the Secretary of Labor no later than 120 days of the filing of the grievance or complaint with the state, or the filing of the appeal of a local grievance or complaint with the state.

In cases where a decision has been reached and the state issued an adverse decision, the party can file an appeal to the Secretary of Labor within 60 days of the receipt of the decision being appealed.

The request for appeal must be submitted by certified mail, return receipt to:

Attention: ASET Secretary U. S. Department of Labor 200 Constitution Avenue, NW Washington, D.C. 20210

A copy of the appeal must be simultaneously provided to the ETA Region I Regional Administrator at: U.S. Department of Labor, Employment and Training Administration, Room E-350, John F. Kennedy Federal Building, 25 New Sudbury Street, Boston, MA 02203 and the opposing party.

ACTION:

All WORKFORCE DEVELOPMENT AREAs shall review grievance and complaint procedures specified in this directive and ensure that the policies and procedures are in accordance with these requirements.

CREDENTIALS

The Department of Labor’s high priority performance goals is to increase the number of people who receive training, attain a degree or certificate, and find subsequent employment through the following programs: Workforce Innovation and Opportunities Act (WIOA) adult, dislocated worker, and youth, National Emergency Grants (NEG), Trade Adjustment Assistance (TAA), and Career Pathways,” including Community-Based Job Training grants by June 2012. This goal reflects the Administration’s continued emphasis on job training and the attainment of industry-recognized
credentials as a strategy for both enhancing earnings and employment for participants in the public workforce system and meeting the economy's need for more skilled workers. (TEGL 15-10)

Training is often only one component of the certificate performance measures. In most instances, successful completion of training is coupled with other requirements to receive a credential. A course completion certificate alone is usually insufficient to demonstrate credential attainment. Examples of credentials that meet the criteria outlined in this policy are included in Part F.

A. Policy All training services must be clearly identified and expectations for earning of a credential must be stated in the participant’s Individual Service Strategy or Individual Employment Plan. The participant must understand that once training begins, he or she is expected to complete all required activities. Partial program completion does not meet the intent of Federal requirements and case managers must not report credentials if the participant failed to complete the entire program.

Based on the USDOL/Employment and Training Administration policy regarding credentials and the definitions cited in Part B, the following criteria will be used to define training services and "other organized programs of study." All of these criteria must be met for the program to be deemed credential eligible for all performance measures that evaluate credential attainment.

1. A program is typically more than one course. Stand-alone courses, in general, do not meet the measures’ intent. There may be exceptions which must be reviewed by WIOA staff on a case-by-case basis. 2. The training must have a clear structure and standardized mechanism of delivery. 3. The program fulfills a specific set of occupational requirements with clear and measurable goals and objectives. The credential holder has the required skills to be functional on the job on the first day of employment, with minimal supervision. 4. The credential and knowledge/skills are transferable from one employer to another within the industry(s) that recognizes the credential. 5. The credential must be issued by one of the organizations listed in the credential definition. There are no exceptions. 6. If applicable to the occupation, the participant cannot secure a license or certificate to practice the skills acquired through the program without successfully completing the program and the license or certification is required to secure employment. 7. Successful program completion is determined by a validated and reliable set of evaluation instruments. 8. There must be clear evidence from the program provider or certifying agency that a credential is not awarded if the customer fails to successfully complete the program, demonstrate competency in all skills and objectives, and/or pass all required tests and examinations. This means all attendance requirements must be fulfilled, a minimum rating of "satisfactory" must be documented for all required practical skills, a passing score must be achieved on written tests or examinations, and any other requirements for credentialing must be met.

If a case manager cannot determine if a program of instruction meets the definition of a credential based on the criteria listed above, they may request a determination from WIOA staff.

Short term training courses that address only one skill set out of many do not meet the intent of the measures. Organizations that rely on a train-the-trainer, trickle-down method of delivery may not be acceptable because of the lack of standardization, official oversight and questionable employer or industry endorsement. Programs of this type will be examined by WIOA staff on a case-by-case basis before a determination of acceptability will be made using the criteria outlined in this policy.

Documentation: Service providers should obtain a copy of the certificate (diploma, certificate, school letters, license or school transcript which indicates degree attained, etc.) and place the document in
the participant’s file. Note: School letters must have the participant’s name and actual date of graduation.

B. Performance Measures Youth Attainment of a Degree or Certificate reporting is required for the Youth Attainment of a Degree or Certificate measure.

Methodology: Of those enrolled in education (at the date of participation or at any point during the program):

The number of youth participants who attain a diploma, or state approved high school equivalency diploma by the end of the third quarter after the exit quarter divided by the number of youth participants who exit during the quarter.

Credentials awarded by workforce investment boards or awarded in recognition of only Generic pre-employment or work readiness skills are not included in this definition.

C. Credential-Related Definitions The following definitions apply to the above-referenced performance measures for all participants who began receiving services on or after July 1, 2006.

Advanced Training/Occupational Skills Training applies to youth and means an organized program of study that provides specific vocational skills that lead to proficiency in performing actual tasks and technical functions required by certain occupational fields at entry, intermediate, or advanced levels. Such training should be outcome oriented and focused on a long-term goal as specified in the Individual Service Strategy (ISS) and result in attainment of a certificate as defined below.

In December 2010, TEGL 15-10 updated the “Certificate” definition for the purpose of accounting for credential attainment to Credential.

Credential means an award in recognition of an individual’s attainment of measurable technical or occupational skills necessary to gain employment or advance within an occupation. These technical or occupational skills are generally based on standards developed or endorsed by employers. Credentials awarded by workforce investment boards are not included in this definition, nor are work readiness credentials because neither of them document “measurable technical or occupational skills necessary to gain employment or advance within an occupation.” A variety of different public and private entities issue credentials. Below is a list of types of organizations and institutions that award industry-recognized credentials:

- A state education agency, or a state agency responsible for administering vocational and technical education within a state;
- An institution of higher education described in Section 102 of the Higher Education Act (20 USC 1002) that is qualified to participate in the student financial assistance programs authorized by Title IV of that Act. This includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in federal student financial aid programs;
- A professional, industry, or employer organization (e.g., National Institute for Automotive Service Excellence certification, or a National Institute for Metalworking Skills, Inc., Machining Level 1 credential) or a product manufacturer or developer (e.g., Microsoft Certified Database Administrator, Certified Novell Engineer, or a Sun Certified Java Programmer) using a valid and reliable assessment of an individual’s knowledge, skills and abilities;
- ETA’s Office of Apprenticeship or a State Apprenticeship Agency;
- A public regulatory agency, upon an individual’s fulfillment of educational, work experience or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (e.g.,
Federal Aviation Administration aviation mechanic license, or a state-licensed asbestos inspector); • A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons; • Job Corps centers that issue credentials; and Institutions of higher education that are formally controlled, or have been formally sanctioned or chartered by, the governing body of an Indian tribe or tribes.

Diploma means any certificate that the state education agency accepts as equivalent to a high school diploma. This term also includes post-secondary degrees such as Associate (AA and AS) and Bachelor (BA and BS) degrees.

Education means participation in secondary school, post-secondary school, adult education programs, or any other organized program of study leading to a degree or certificate.

Employer endorsement means that employers within a particular industry or cluster of industries recognize the certificate and would not impose an employment barrier because the program was completed in another state or other regional location.

Post-secondary Education means a program at an accredited degree-granting institution that leads to an academic degree (i.e., AA, AS, BA or BS).

For definitions of Training Services, refer to Section 4.00 Adult and Dislocated Worker Services and Activities or Section 4.10 Youth Services and Activities

D. Determining Appropriateness of Credentials The following is a list of questions to consider when reviewing a program of instruction for certificate eligibility. The resources cited for each question are examples of the types of requirements or program policies to look for when attempting to answer the questions. The resources identified are not comprehensive; you may find other resources locally that also support your decision to define a program of instruction as "certificate-eligible". College course catalogues and degree/certificate requirements typically answer many of these questions to the extent necessary to make your determination. Employers who will hire certificate holders can also answer questions when a training catalogue doesn’t provide the necessary information.

Question 1: Is the program more than one course of instruction? If it is one course only, what can be expected of the participant after successfully completing the course?

What to look for: ? Program descriptions in college or training provider catalogues. ? Occupational licensing and certification requirements by the certifying agency.

Question 2: Does the training program have structure? Is there a standardized mechanism of delivery?

What to look for: ? Lesson plan(s) ? Curriculum ? Class syllabus ? Prerequisites - i.e., the program is completed through a series of training activities that build upon each other to expand the student’s breadth and depth of knowledge and skills. ? Evidence based on lesson plans, curricula, etc. that instructors typically teach the course in the same sequence, according to the same schedule, each time the course is offered.

Question 3: Does the program fulfill a specific set of occupational requirements with clear and measurable goals and objectives? Can the certificate holder function effectively on the first day of employment with minimal supervision?
What to look for: ? Job qualifications or pre-requisites (e.g., licensure, certification or any other evidence the prospective employee must provide as evidence of competency in order to be hired). ? Once all training and testing is completed, what does the student obtain for his/her effort? (e.g., license to practice, credentials of competency, eligibility for higher levels of training and education). ? The individual can perform the work required by the occupation without additional training immediately after hiring. For example, an emergency medical technician (EMT) can perform Cardiopulmonary Resuscitation (CPR) on a patient at the time of hiring by an ambulance service.

Question 4: Is the certificate and knowledge/skills transferable from one employer to another within the industry that recognizes the certificate?

What to look for: ? Employer hiring standards within the industry. ? Evidence of reciprocity across state or regional borders (i.e., no further training is required to secure the same job in another location, or minimal training requirements to account for regulatory differences associated with State licensing and certification laws/regulations.) For example, an EMT certified by the National Registry of EMTs in the State of Wyoming would be immediately eligible for EMT licensure and hiring in the State of Connecticut.

Question 5: Who issues the certificate or license?

What to look for: ? Licensing or certification requirements identified by the training program provider. ? State, county, tribal or municipal licensing or certification regulations or requirements. ? Professional or industry endorsements and standards. ? Apprenticeship programs.

Question 6: Can the participant secure a job in the occupation without obtaining the certificate or license? If all other job candidate qualifications are equal, which candidate would the employer choose: the one with the certificate or the one without it?

What to look for: ? Eligibility requirements for certificates, licenses or credentials. ? Continuing education requirements to renew certificates, licenses or credentials. ? Certificate, license or credential expiration dates. ? Length of time a certificate, license or credential is valid. ? Recertification requirements after a certificate, license or credential has expired. ? Employer requirements for maintaining current certification, licensure or credentials. ? Employer prerequisites to employment that state a preference for applicants with the certificate/license/credential.

Question 7: How is successful program completion determined?

What to look for: ? A written test must be passed to qualify for a license, certificate or credential. ? A practical skills test (if applicable) must be passed to qualify for a license, certificate or credential. ? The training program and courses have clearly stated pass-fail criteria that apply to all students. ? All students are tested according to the same sets of standards and criteria determined by the occupation to be minimally acceptable. ? Reasonable testing accommodations for individuals with disabilities measure the same standards and competencies as any other student who has participated in the program.

Question 8: Does an individual need to successfully complete the training program or attain specific competencies in order to receive a certificate or license?
What to look for: ? Eligibility requirements for certificates, licenses or credentials. ? Minimum acceptable grade point average and/or examination score. ? Program and course attendance requirements.

E. Activities that May Count Toward a Credential 1. Adult, Dislocated Worker: Participants who participated in and successfully completed one or more of the following training activities will be considered as achieving a credential for performance provided the credential meets the definition in part C of this section: • Occupational Skills Training • Activities relating to completing a high school equivalency program • Activities relating to training for participants who speak English at a level that is not adequate for functioning on the job or in society

2. Youth: Youth participants ages 14-24 who successfully complete one or more of the following training activities will be considered as achieving a credential for performance. The credential must meet the definition in part C of this section: • Occupational Skills Training • Alternative Secondary School Services • Tutoring, study skills and instruction leading to secondary school completion including dropout prevention • Activities relating to completing a high school equivalency program • Activities relating to training for participants who speak English at a level that is not adequate for functioning on the job or in society Participants would typically be enrolled either at participation or during participation in one of the following training opportunities: • Secondary education • High school equivalent programs • Post-secondary education • Advanced training/advanced training-occupational skills training

F. Credential Examples and Resources Examples of acceptable credentials include, but are not limited to: • a high school diploma, GED, or other recognized high school equivalency certificates • post-secondary degrees/certificates • recognized skill standards, licensure or industry-recognized credentials (i.e., ASE car repair, Hazmat, CNA, CDL, Boiler Operator, Flag Person, Heavy Equipment Operator, Registered Nurse, etc.), and • all state education agency recognized certificates.

Examples of credentials that are not acceptable include, but are not limited to: work readiness certificates, a standard driver’s license, or certificates issued for participation or attendance.

Resource: Certification Finder database www.careerinfonet.org/certifications_new/ is an online resource that may be helpful to service providers. This information is provided as a resource and is NOT an endorsement of the certifications listed on the site.

SUPPORTIVE SERVICES

A. Supportive Services § 680.900 Supportive services are services that are reasonable and necessary to enable a WIOA participant who cannot afford to pay for such services to participate in activities funded under WIOA. The provision of Supportive Services must be determined on an individual case-by-case basis.

All WIOA participants are eligible to receive supportive services provided they meet all other criteria described in this supportive services policy. The funding for the supportive services is provided by the program(s) in which they are enrolled.

Supportive services shall only be used to pay for specific necessary services and shall be limited to payments that are necessary for participation in the program. The individual determination of need and the amount of such assistance shall be based upon the results of the comprehensive
assessment or objective assessment and similarly documented in the Individual Employment Plan (IEP) for adults/dislocated workers and the Individual Service Strategy (ISS) for youth. Documentation must be maintained in the participant's files. Source documentation includes but is not limited to actual utility bills and receipts for goods and services purchased. Accepting a participant’s self-disclosure or declaration of expenses as documentation is not allowable. Additionally, source documentation must be current and not incurred prior to the individual's enrollment in a WIOA program. The provider is responsible for documenting in the IEP/ISS or case notes that the service is not available from any other source (including the participant's own resources).

All supportive services must have been approved prior to the participant receiving or obtaining the goods or services.

A participant may waive WIOA payments (except for a paid Work Experience) if accepting payment would mean the loss of the benefits. The participant may request the payment to start at a later date, but may not claim retroactive payments. Advances against future payments are not allowed.

Supportive services cannot be used to pay for charges that were incurred prior to the participant's enrollment. Therefore to be eligible for any WIOA financial assistance payments, a participant must have been determined WIOA eligible and: • participating in youth services/activities or participating in intensive and/or training services for adults and dislocated workers; • are unable to obtain supportive services through other programs providing such services; and • must have complied with program regulations and policies during the period of training and/or enrollment as applicable.

Service providers should provide no further payments to participants that fail to participate without good cause.

The use of supportive services is encouraged to enable hard-to-serve populations in particular to participate in longer-term interventions. As noted earlier the provision of supportive services must be determined on an individual basis.

§ 680.910 When may supportive services be provided to participants? (a) Supportive services may only be provided to individuals who are:

(1) Participating in career or training services as defined in WIOA secs. 134(c)(2) and (2) Unable to obtain supportive services through other programs providing such services.

(b) Supportive services only may be provided when they are necessary to enable individuals to participate in career service or training activities.

Youth Supportive Services § 681.570 Supportive services for youth, as defined in WIOA sec. 3(59), are services that enable an individual to participate in WIOA activities. These services include, but are not limited to, the following: • Linkages to community services • Assistance with transportation; • Assistance with child care and dependent care; • Assistance with housing; • Needs-related payments; • Assistance with educational testing; • Reasonable accommodations for youth with disabilities; • Legal aid services; • Referrals to health care; • Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eyeglasses and protective eye gear; • Assistance with books, fees, school supplies, and other necessary items for students enrolled in postsecondary education classes; and • Payments and fees for employment and training-related applications, tests, and certifications. E. Needs-Related Payments § 680.930.
related payments provide financial assistance to participants for the purpose of enabling individuals
to participate in training and are one of the supportive services authorized by WIOA Sec. 134(d)(3).

2. Individual determination of a participant’s payment and the amount of such payment shall be
based upon the results of the objective assessment and recorded in the IEP.

3. Needs-related payments shall not be provided to any participant for the period that such individual
is employed, enrolled in or receiving on-the-job training, out-of-the area job search allowances,
relocation allowances, trade readjustment allowances, or basic readjustment services in WIOA
programs.

Needs-related payments may be provided if the participant has been accepted in a training program
that will begin within 30 calendar days. § 680.940 4. Needs-related Payments to Adults and Youth
(age 18 or older) a. To meet the eligibility requirements for needs-related payments the individual
must: (1) be unemployed; (2) not qualify for, or has ceased to qualify for unemployment
compensation; and (3) be enrolled in a program of WIOA Title IB training services under WIOA Sec.
134(c)(3). § 680.970 b. Needs-Related Payment Level. There is currently no needs-related payment
level in place. Service providers should determine the level of needs-related payments based on
budget and the participant’s needs. § 680.950 5. Needs-related Payments to Dislocated Workers a.
To meet the eligibility requirements for needs-related payments an individual must: (1) be
unemployed; (2) have ceased to qualify for unemployment compensation or trade readjustment
allowance under TAA; and (3) be enrolled in WIOA Title IB dislocated worker training services by the
end of the thirteenth week after the most recent layoff that resulted in eligibility determination for the
program; or if later, by the end of the eighth week after the worker is informed that a short-term layoff
will exceed six months; or (4) be unemployed and did not qualify for unemployment compensation or
trade readjustment allowance under TAA and be enrolled in a program of training services under
WIOA Sec. 134(c)(3).

b. Needs-Related Payment Level. The needs-related payment level for dislocated workers must not
exceed the greater of either of the following levels: (1) the payment may not exceed the applicable
weekly level of the unemployment compensation; or (2) the economically disadvantaged income
level for participants who did not qualify for unemployment insurance as a result of a qualifying
layoff, the weekly payment may not exceed the poverty level for an equivalent period. (Family Size
and Income and Income Determination Section 3.70 of this manual). WIOA 20 CFR Part 680.970 §
680.960 c. Needs-related payments may be provided while the participant is waiting to start training
classes. The participant must have been accepted in a training program that will begin within 30
calendar days. WIOA 20 CFR Part 680.960

6. Needs-related Payments to Youth Needs-related payments are allowable supportive services to
youth. WIOA 20 CFR Part 681.570

7. “Enrolled in a training or education program" means that the application for training has been
approved and the training institution has furnished written notice that the individual has been
accepted in the approved training program beginning within thirty calendar days.

Needs-related payments are only allowable where WIOA Formula funds are sufficient to allow such
costs. With National Emergency Grants, needs-related payments must be part of the grant budgets
submitted and approved by the United States Department of Labor.
§ 680.330 How can Individual Training Accounts, supportive services, and needs-related payments be used to support placing participating adults and dislocated workers into a registered apprenticeship program and support participants once they are in a registered apprenticeship program?

Registered apprenticeships automatically qualify to be a on a State’s eligible training provider list (ETPL) as described in § 680.470. (a) ITAs can be used to support placing participants in registered apprenticeship through: (1) Pre-apprenticeship training, as defined in § 681.480 of this chapter; and (2) Training services provided under a registered apprenticeship program. (b) Supportive services may be provided as described in §§ 680.900 and 680.910. (c) Needs-related payments may be provided as described in §§ 680.930, 680.940, 680.950, 680.960, and 680.970. (d) Work-based training options also may be used to support participants in registered apprenticeship programs (see §§ 680.740 and 680.750).

FOLLOW-UP SERVICES AND ACTIVITIES

Follow-up Services are services that are provided to adult and dislocated worker participants who enter employment and all youth participants after exiting their WIOA enrollment. Follow-up services provide a continuing link between the participant and workforce system. These services allow providers to assist with other services that the participant may need once he or she obtains employment. A. Adult and Dislocated Worker Follow-up Services Appropriate follow-up Services, that may include counseling regarding the workplace, must be made available to Adult and Dislocated Worker participants who exit to unsubsidized employment for a minimum of 12 months following the first date of employment.

Case managers should contact the participant at least once a quarter to check in with participants who have obtained unsubsidized employment to see if they need assistance in job retention, wage gains and career progress.

Appropriate follow-up services may vary among different participants, for example participants with multiple employment barriers and limited work histories may need significant follow-up services to ensure long-term success in the labor market including program funded supportive services. Others may identify an area of weakness in WIOA training that may affect their ability to progress further in their occupation or to retain employment.

Follow-up services could include: 1. additional career planning and counseling 2. contact with the participant’s employer, including assistance with work related problems that may arise; 3. peer support groups; 4. information about additional educational opportunities; 5. limited financial support; and 6. referral to supportive services available in the community.

Financial assistance such as needs-related payments are not an allowable follow-up service.

B. Youth Follow-up Services 1. All WIOA Youth participants, with the exception of those listed in B.2. must receive some form of follow-up services for a minimum duration of 12 months. Follow-up services may be provided beyond 12 months if it’s beneficial to the youth to continue to receive follow-up services. Follow-up services are critical services that are provided following a youth’s exit from the program to help ensure the youth is successful in employment and/or post-secondary education and training. Case manager should make contact at least quarterly with the youth to ascertain their status and to determine if they need additional service or support. This must be documented in case notes. The types of services provided and the intensity of follow-up services
may differ for each participant however follow-up services must include more than only a contact attempted or made for securing documentation in order to report a performance outcome. WIOA Law Sec. 129(c)(2)(I)

§ 681.580 Youth follow-up services may include: (1) The leadership development and supportive service activities listed in 20 CFR Parts 681.520 and 681.570; (2) Regular contact with youth participant’s employer, including assistance in addressing work-related problems that arise; (3) Assistance in securing better paying jobs, career pathway development and further education or training; (4) Work-related peer support groups; (5) Adult mentoring; and/or (6) Providing services as necessary to ensure the success of youth participants in employment and/or post-secondary education. WIOA Regs. 20 CFR Part 681.580

2. Although WIOA regulations mandate the provision of follow-up services to all youth there will be times when it might not be possible to provide follow-up services or to provide these services for a minimum of twelve (12) months. Some youth may have relocated to another state, or cannot be located or contacted after several attempts, or have clearly communicated that they are not interested in receiving further services or additional assistance. While there is no doubt of the value of providing follow-up services that service provision may not be possible in every instance and cannot be “forced.” In these instances it is critical to exercise due diligence with respect to the mandatory provisions of follow-up services for a minimum duration of 12 months after exit. Case managers must document thoroughly in CTHires case notes the justification for not providing follow-up services.

Youth that might not receive follow-up services include: • Youth that have not been in contact with the case manager for a period of at least 90 days (3 quarters). NOTE: Case managers should document at least six attempts to contact the youth in that time period; • Youth that have moved from the area; • Youth that refuse to participate; • Youth that are institutionalized; • Youth receiving medical treatment or providing care for a family member with a health/medical condition that precludes continued participation in the program; • Youth who have relocated to a mandated program i.e., youth in foster care or another mandated program and have moved from the area because of such program This does not include relocation to Job Corps 3. Youth that are in follow-up but cannot be contacted. Keep the follow-up service activity open on the youth’s CTHires Employment Plan. Attempt to contact the youth at least once a quarter and document this in a case note. Close the follow-up service at the end of the minimum requirement period of 12 months.

C. Follow-up Activities Follow-up activities are conducted to ensure positive outcomes and to give credit for outcomes. Obtaining supplemental data to determine if the individual is employed in the four calendar quarters following exit to unsubsidized employment is a follow-up activity.

Timelines for Quarterly Follow-Up The first quarter follow-up should be done during the calendar quarter after the participant exits from WIOA programs.

Calendar quarters: January-March April-June July-September October-December

Example: If a participant exits September 30, 2011, follow-up would be done according to the following calendar quarters: 1st Quarter: October - December 2011 2nd Quarter: January - March 2012 3rd Quarter: April - June 2012 4th Quarter: July - September 2012
Example: If a participant exits May 2, 2011, follow-up would be done according to the following calendar quarters: 1st Quarter: July - September 2011 2nd Quarter: October - December 2011 3rd Quarter: January - March 2012 4th Quarter: April - June 2012

Follow-up must actually occur during the quarter being recorded.

As per USDOL common measures policy (TEGL 17-05, dated 2/17/06), allowable sources of supplemental information for tracking employment-related outcomes include case management notes, automated data base systems (i.e., MISTICS), documented contacts with employers, and participant surveys. Providers must keep in mind that all supplemental data and methods are to be documented and are subject to audit.

D. Supplemental Data Requirements Supplemental Data refers to information collected in lieu of Unemployment Insurance (UI) wage records in order to demonstrate an employment-related outcome.

State UI wage records are the preferred data source for any performance measure pertaining to employment, including ETA’s Adult Common Measures. These records are owned by individual State Workforce Agencies and are governed by confidentiality and privacy statutes; most entities, including community colleges and private organizations, do not have access to wage records, which contain personally identifiable information including Social Security Numbers (SSNs). This is the reason that ETA has assumed the burden of tracking Common Measures for grantees that provide the four (4) data elements as detailed in the High Growth and Community-Based Job Training Grants: General Quarterly Reporting Forms and Instructions.

There are several allowable sources of Supplemental Data. In the absence of UI wage records, there are several sources of supplemental data that can be used to demonstrate employment-related outcomes. These include copies of pay stubs covering the period called for by the performance measure, employer documentation (including written affidavit or telephone conversation) indicating the individual was employed some time during the period called for by the performance measure, documentation from the former participant, case management notes and proprietary websites that offer employer fee-based information.

Information from Employers: In general, this pertains to a written affidavit or documented telephone conversation with an employer indicating the individual was employed at some time during the period called for by the performance measure. At a minimum, grantees should obtain a signed release from participants prior to exit allowing such contact. The employer verification, whether written affidavit, letter on official letterhead or telephone conversation, should contain the employer’s name, dates of employment for the individual in question and earnings for the period, in addition to the name, title, address, and telephone number of the employer representative providing the information.

Information from Former Participant: In general, this pertains to a written attestation form or documented telephone contact with the former participant that they were employed during the period called for by the performance measure. At a minimum, this should include updated contact information for the former participant, dates of employment and total earnings for the period, the employer’s name, address and telephone number and, in the case of a written attestation, the signature and date signed by the former participant. (If a documented telephone conversation is utilized, then the information should include the name/signature and date signed by the grantee’s staff member.)
Information from Proprietary Websites: A number of websites offer fee-based employment verification and wage-related information, although not all employers provide information to all sources. These include www.theworknumber.com, www.verifyjob.com, and www.usverify.com/incomeverify.html. These websites are not endorsed by USDOL-ETA.

All Supplemental Data sources must be documented and are subject to audit.

THE WORKER ADJUSTMENT AND RETRAINING NOTIFICATION ACT

The Worker Adjustment and Retraining Notification Act (WARN) was enacted on August 4, 1988 and became effective on February 4, 1989.

A. General Provisions WARN offers protection to workers, their families and communities by requiring employers to provide 60 days in advance notice of covered plant closings, and covered mass layoffs. This notice must be provided to either affected workers or their representatives (e.g., a labor union); to the State dislocated worker unit; and to the appropriate unit of local government.

B. Employer Coverage In general, employers are covered by WARN if they have 100 or more employees, not counting employees who have worked less than 6 months in the last 12 months and not counting employees who work an average of less than 20 hours a week. Private, for-profit employers and private, nonprofit employers are covered, as are public and quasi-public entities which operate in commercial context and are separately organized from the regular government. Regular Federal, State, and local government entities that provide public services are not covered.

C. Employee Coverage Employees entitled to notice under WARN include hourly and salaried workers, as well as managerial and supervisory employees. Business partners are not entitled to notice.

D. What Triggers Notice Plant Closing: A covered employer must give notice if an employment site (or one or more facilities or operating units within an employment site) will be shut down, and the shutdown will result in an employment loss (as defined later) for 50 or more employees during any 30-day period. This does not count employees who have worked less than 6 months in the last 12 months or employees who work an average of less than 20 hours a week for that employer. These latter groups, however, are entitled to notice (discussed later).

Mass Layoff: A covered employer must give notice if there is to be a mass layoff which does not result from a plant closing, but which will result in an employment loss at the employment site during any 30-day period for 500 or more employees, or for 50-499 employees if they make up at least 33% of the employer’s active workforce. Again, this does not count employees who have worked less than 6 months in the last 12 months or employees who work an average of less than 20 hours a week for that employer. These latter groups, however, are entitled to notice (discussed later).

An employer must also give notice if the number of employment losses which occur during a 30-day period fails to meet the threshold requirements of a plant closing or mass layoff, but the number of employment losses for 2 or more groups of workers, each of which is less than the minimum number needed to trigger notice, reaches the threshold level, during any 90-day period of either a plant closing or mass layoff. Job losses within any 90-day period will count together toward WARN threshold levels, unless the employer demonstrates that the employment losses during the 90-day period are the result of separate and distinct actions and causes.
E. Sale of Business In a situation involving the sale of part or all of a business, the following requirements apply. (1) In each situation, there is always an employer responsible for giving notice. (2) If the sale by a covered employer results in a covered plant closing or mass layoff, the required parties (discussed later) must receive at least 60 days notice. (3) The seller is responsible for providing notice of any covered plant closing or mass layoff, which occurs up to, and including the date/time of the sale. (4) The buyer is responsible for providing notice of any covered plant closing or mass layoff, which occurs after the date/time of the sale. (5) No notice is required if the sale does not result in a covered plant closing or mass layoff. (6) Employees of the seller (other than employees who have worked less than 6 months in the last 12 months or employees who work an average of less than 20 hours a week) on the date/time of the sale become, for purposes of WARN, employees of the buyer immediately following the sale. This provision preserves the notice rights of the employees of a business that has been sold.

F. Employment Loss The term “employment loss” means: (1) An employment termination, other than a discharge for cause, voluntary departure, or retirement; (2) A layoff exceeding 6 months; or (3) A reduction in an employee’s hours of work of more than 50% in each month of any 6-month period.

Exceptions: An employee who refuses a transfer to a different employment site within reasonable commuting distance does not experience an employment loss. An employee who accepts a transfer outside this distance within 30 days after it is offered or within 30 days after the plant closing or mass layoff, whichever is later, does not experience an employment loss. In both cases, the transfer offer must be made before the closing or layoff, there must be no more than a 6 month break in employment, and the new job must not be deemed a constructive discharge. These transfer exceptions from the “employment loss” definition apply only if the closing or layoff results from the relocation or consolidation of part of all of the employer’s business.

G. Exemptions An employer does not need to give notice if a plant closing is the closing of a temporary facility, or if the closing or mass layoff is the result of the completion of a particular project or undertaking. This exemption applies only if the workers were hired with the understanding that their employment was limited to the duration of the facility, project or undertaking. An employer cannot label an ongoing project “temporary” in order to evade its obligations under WARN.

An employer does not need to provide notice to strikers or to workers who are part of the bargaining unit(s) which are involved in the labor negotiations that led to a lockout when the strike or lockout is equivalent to a plant closing or mass layoff. Non-striking employees who experience an employment loss as a direct or indirect result of a strike and workers who are not part of the bargaining unit(s), which are involved in the labor negotiations that led to a lockout, are still entitled to notice.

An employer does not need to give notice when permanently replacing a person who is an “economic striker” as defined under the National Labor Relations Act.

H. Who Must Receive Notice The employer must give written notice to the chief elected officer of the exclusive representative(s) or bargaining agency(s) of affected employees and to unrepresented individual workers who may reasonably be expected to experience an employment loss. This includes employees who may lose their employment due to “bumping,” or displacement by other workers, to the extent that the employer can identify those employees when notice is given. If an employer cannot identify employees who may lose their jobs through bumping procedures, the employer must provide notice to the incumbents in the jobs, which are being eliminated. Employees who have worked less than 6 months in the last 12 months and employees who work an average of
less than 20 hours a week are due notice, even though they are not counted when determining the trigger levels.

The employer must also provide notice to the State dislocated worker unit and to the chief elected official of the unit of local government in which the employment site is located.

I. Notification Period With three exceptions, notice must be timed to reach the required parties at least 60 days before a closing or layoff. When the individual employment separations for a closing or layoff occur on more than one day, the notices are due to the representative(s), State dislocated worker unit and local government at least 60 days before the separation. If the workers are not represented, each worker’s notice is due at least 60 days before that worker’s separation. The exceptions to 60-day notice are: (1) Faltering company. This exception, to be narrowly construed, covers situations where a company has sought new capital or business in order to stay open and where giving notice would ruin the opportunity to get the new capital or business, and applies only to plant closings; (2) Unforeseeable business circumstances. This exception applies to closings and layoffs that are caused by business circumstances that were not reasonably foreseeable at the time notice would otherwise have been required; and (3) Natural disaster. This applies where a closing or layoff is the direct result of a natural disaster, such as a flood, earthquake, drought or storm.

If an employer provides less than 60 days advance notice of a closing or layoff and relies on one of these three exceptions, the employer bears the burden of proof that the conditions for the exception have been met. The employer also must give as much notice as is practical.

When the notices are given, they must include a brief statement of the reason for reducing the notice period in addition to the items required in notices.

J. Form and Content of Notice No particular form of notice is required. However, all notices must be in writing. Any reasonable method of delivery designed to ensure receipt 60 days before a closing or layoff is acceptable. Notice must be specific. Notice may be given conditionally upon the occurrence or nonoccurrence of an event only when the event is definite and its occurrence or nonoccurrence will result in a covered employment action less than 60 days after the event.

The content of the notices to the required parties is listed in section 637.7 of the WARN final regulations. Additional notice is required when the date(s) or 14-day period(s) for a planned plant closing or mass layoff are extended beyond the date(s) or 14-day period(s) announced in the original notice.

K. Record No particular form of record is required. The information employers will use to determine whether, or whom, and when they must give notice is information that employers usually keep in ordinary business practices and in complying with other laws and regulations.

L. Penalties An employer who violates the WARN provisions by ordering a plant closing or mass layoff without providing appropriate notice is liable to each affected employee for an amount including back pay and benefits for the period of violation, up to 60 days. The employer’s liability may be reduced by such items as wages paid by the employer to the employee during the period of violation and voluntary and unconditional payments made by the employer to the employee.

An employer who fails to provide notice as required to a unit of local government is subject to a civil penalty not to exceed $500 for each day of violation. This penalty may be avoided if the employer
satisfies the liability to each affected employee within 3 weeks after the employer orders the closing or layoff.

M. Enforcement Enforcement of WARN requirements is through the United States district courts. Workers, representatives of employees and units of local government may bring individual or class action suits. In any suit, the court, in its discretion, may allow the prevailing party a reasonable attorney’s fee as part of the costs.

N. Information Specific requirements of the Worker Adjustment and Retraining Notification Act may be found in the Act itself, Public Law 100-379 (29 U.S.C. 2101, et seq.) The Department of Labor published final regulations on April 20, 1989 in the Federal Register (Vol. 54, No. 75).

The regulations appear at 20 CFR Part 639. General questions on the regulations may be addressed to: Employment and Training Administration (ETA) Office of National Response Division of Worker Dislocation and Special Response 200 Constitution Avenue, NW Room N-5422 Washington, DC 20210. Tel: 1-877-US2-JOBS (1-877-872-5627), or 202-693-3500 TTY: 1-877-889-5627

Or: Connecticut Department of Labor and Industry Rapid Response Coordinator 1315 E. Lockey Ave. PO BOX 1728 Helena MT 59624-1728 (406) 444-4100

The US Department of Labor and Connecticut Department of Labor, since they have no administrative or enforcement responsibility under WARN, cannot provide specific advice or guidance with respect to individual situations.

RAPID RESPONSE § 682.300

Rapid Response encompasses the strategies and activities necessary to (1) plan for and respond to announcements of a closure or layoff; or mass job dislocations due to natural or other disasters; and (2) to deliver services to enable dislocated workers to transition to new employment as quickly as possible. The purpose of rapid response is to promote economic recovery by responding to layoffs and dislocations and preventing or minimizing the impact on workers, businesses and communities. Rapid Response strategies and activities that are noted in Title I-B, Section 134 of the Workforce Innovation and Opportunity Act, are provided by the Job Service Operations Bureau (JS Bureau) through the statewide network of Job Service Centers to individuals determined to be eligible dislocated workers.

§ 682.302 Under what circumstances must rapid response services be delivered? Rapid response must be delivered when one or more of the following circumstances occur:

(a) Announcement or notification of a permanent closure, regardless of the number of workers affected;

(b) Announcement or notification of a mass layoff as defined in § 682.305;

(c) A mass job dislocation resulting from a natural or other disaster; or

(d) The filing of a Trade Adjustment Assistance (TAA) petition.
§ 682.305 How does the Department define the term “mass layoff” for the purposes of rapid response? For the purposes of rapid response, the term “mass layoff” used throughout this subpart will have occurred when at least one of the following conditions have been met:

(a) A layoff meets the State’s definition of mass layoff, as long as the definition does not exceed a minimum threshold of 50 affected workers;

(b) Where a State has not defined a minimum threshold for mass layoff meeting the requirements of paragraph (a) of this section, layoffs affecting 50 or more workers; or

(c) When a Worker Adjustment and Retraining Notification (WARN) Act notice has been filed, regardless of the number of workers affected by the layoff announced.

§ 682.320 A. Rapid Response Activities include, but are not limited to: 1) Informational and direct reemployment services for workers, including but not limited to information and support for filing unemployment insurance claims, information on the impacts of layoff on health coverage and other benefits, information on and referral to career services, reemployment-focused workshops and services, and training; 2) Delivery of solutions to address the needs of businesses to transition, provided across the business lifecycle (expansion and contraction), including comprehensive business engagement and layoff aversion strategies and activities designed to prevent or minimize the duration of unemployment; 3) Convening, brokering, and facilitating the connections, networks and partners to ensure the ability to provide assistance to dislocated workers and their families such as home heating assistance, legal aid, and financial advice; and 4) Strategic planning, data gathering and analysis designed to anticipate, prepare for, and manage economic change. WIOA 20 Parts CFR 682.300 and 682.310

§ 682.330 B. Required Rapid Response activities: 1) Layoff aversion activities 2) Immediate contact with the employer, representatives of the affected workers, and the local community, including an assessment of and plans to address the: a. Layoff plans and schedule of the employer; b. Background and probable assistance needs of the affected workers; c. Reemployment prospects for workers; and d. Available resources to meet the short and long-term assistance needs of the affected workers 3) The provision of information and access to unemployment compensation benefits and programs, one-stop system services, employment and training activities, including information on the WIOA Dislocated Worker program, Trade Adjustment Assistance, Pell Grants, the GI Bill, and other resources 4) The delivery of other necessary services and resources including workshops, classes and job fairs to support reemployment efforts for the affected workers 5) Developing and maintaining partnerships with other appropriate Federal, State and local agencies and officials, employer associations, industry business councils, labor organizations, and other public and private organizations, in order to: a. Conduct strategic planning to develop strategies to address dislocation events and ensure timely access to a broad range of necessary services b. Develop mechanisms for gathering and exchanging information and data relating to potential dislocations, resources available, and the customization of layoff aversion or rapid response activities, to ensure the ability to provide rapid response services as quickly as possible 6) Delivery of services to worker groups for which a petition for Trade Adjustment Assistance has been filed. WIOA 20 CFR Part 682.330

C. Layoff aversion: Consists of strategies and activities to prevent or minimize the duration of unemployment resulting from layoffs. Layoff aversion strategies and activities may include, but are not limited to: 1) Providing assistance to employers in managing reductions in force, which may include early identification of firms at risk of layoff, assessment of the needs of and options for at-risk
firms, and the delivery of services to address those needs. 2) Ongoing engagement, partnership, and relationship-building activities with businesses in the community, in order to create an environment for successful layoff aversion efforts and to enable the provision of assistance to dislocated workers in obtaining reemployment as soon as possible. 3) Establishing linkages with economic development entities including local business retention and expansion activities 4) Connecting businesses and workers to short-term, on-the-job, or customized training programs and apprenticeships before or after layoff to help facilitate rapid reemployment. WIOA 20 CFR Part 682.320

I. Eligibility Categories for Dislocated Workers

To be determined eligible for Dislocated Worker status, an individual must meet the criteria of one of the following eight categories:

Category 1: 1) An individual who has been terminated or laid off, or received notice of termination or layoff, from employment;

AND

2) is eligible for or has exhausted entitlement to Unemployment Compensation;

AND

3) is unlikely to return to a previous industry or occupation.

Category 2: 1) An individual who has been terminated or laid off, or received notice of termination or layoff, from employment;

AND

2) has been employed for a duration sufficient to demonstrate attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a State unemployment compensation law;

AND

3) is unlikely to return to a previous industry or occupation.

Category 3: An individual who has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility, or enterprise.

Category 4: An individual is employed at a facility at which the employer has made a general announcement that such facility will close within 180 days;

OR
for purposes of eligibility to receive services other than training services, career services, or supportive services, is employed at a facility at which the employer has made a general announcement that such facility will close.

Category 5: An individual who was self-employed (including employment as a farmer, a rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters.

Category 6: An individual who is a displaced homemaker. The term "displaced homemaker" means an individual who has been providing unpaid services to family members in the home and who: 1. has been dependent on the income of another family member but is no longer supported by that income;

OR

1a. Is the dependent spouse of a member of the Armed Forces on active duty and whose family income is significantly reduced because of a deployment, a call or order to active duty, a permanent change of station, or the service-connected death or disability of the member;

AND

2. is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment. Category 7: An individual who is the spouse of a member of the Armed Forces on active duty, and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member.

Category 8: Is the spouse of a member of the Armed Forces on active duty and is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

II. Definitions used in determining eligibility

Category 1: Laid off/terminated (or received notice of layoff/termination), eligible/exhausted unemployment, and unlikely to return to previous industry/occupation (Note that all three parts must be met to meet eligibility criteria for this category) Part One: The worker must have been laid off or terminated, or received a notice of layoff or termination from employment. A worker who files partial claims without having a separation from employment does not meet the criteria for part one.

Part Two: Definition of Eligible for Unemployment: Eligible for Unemployment means the worker:

1. has, or will be, monetarily eligible for unemployment; AND 2. has, or will be, laid off OR 3. has a separation that has been approved as a termination by an adjudicator; AND 4. is able and available for full-time work.

? Workers who are not collecting unemployment due to a dismissal pay disqualification, pension offset, or a prior overpayment are deemed “eligible” under this category.

? This also includes workers who choose not to file for unemployment but would meet the above definition of “eligible for unemployment”. If the worker has not filed for unemployment but is “eligible for unemployment” as described above, a note of “Worker is A&A (able and available)” must be
written in the verification field on the WIOA-5 in addition to the other documentation needed for this part of the category.

Workers who have been indefinitely denied unemployment due to an availability issue, are not eligible for unemployment.

Part Three: Determining Unlikely to Return to a Previous Industry or Occupation

The following workers automatically qualify as unlikely to return to a previous industry or occupation:

• Individuals who are long-term unemployed* • Individuals who have been identified as Trade Adjustment Assistance Act (TAA) eligible under a current TAA certification • Recently separated veterans** • Individuals over age 55 • UI claimants selected for ERS/RESEA • Individuals with less than a high school diploma • Individuals who are English Language Learners*** • Individuals with disabilities****

*Long-term unemployed means unemployed for 27 weeks or more.

**Recently separated veterans means a veteran who was discharged or released from active military duty under other than dishonorable conditions within the past 48 months.

***English language learner means an individual who has limited ability in reading, writing, speaking or comprehending the English language and whose native language is other than English or who resides in a community where English is not the dominant language.

****Disability as defined by 42 U.S. Code 12102 means an individual who has: (A) a physical or mental impairment that substantially limits one or more major life activities of such individual; (B) a record of such an impairment; or (C) being regarded as having such an impairment.

Unlikely to return to a previous occupation can include an individual:

? for whom there are fewer than 10 full-time job postings in his/her field for which he/she is qualified. An individual may have held an occupation that is in demand, but if he or she does not have the required skills as stated in the job description of the posting, then it is unlikely that the worker will be hired.

? who provides a doctor’s note stating that the individual can no longer perform his/her previous occupation for medical reasons.

? who is in an occupation for which State labor market information shows a decline in growth.

? who was employed in an occupation that is not demand in the geographic region in which the individual is applying.

? whose skills are highly specialized and not easily transferable.

? who has conducted an active job search for the past four weeks.
An active job search is described as one where the worker has applied on at least two separate days to at least three employers. A documented job search log with the following information must be provided:

- Date of the contact
- Employer name and address (if known)
- Name of contact person (if known)
- Method of contact (resume, application, etc.)
- Position applied for
- Result of contact (waiting to hear back, interview scheduled)

Unlikely to return to a previous industry can include an individual:

- who worked in an industry for which there is a limited number of employers
- who worked in an industry in the state for which multiple layoff announcements have been made.

Category 2: Laid off/terminated (or received notice of layoff/termination), worked for a sufficient duration to show attachment to the workforce, but is not eligible for unemployment due to insufficient wages or employment not covered by UC law, and unlikely to return to previous industry/occupation

Employment not covered under State unemployment compensation means that the individual worked as an employee for an employer that is not obligated to contribute to the unemployment compensation fund. Examples include certain religious organizations and real estate salespersons paid only by commission.

Attachment to the workforce for applicants who are ineligible for unemployment compensation is defined as:

- individuals who have been working three (3) months or more at the time of separation; OR
- individuals who have worked less than three (3) months at the time of separation but who have conducted an active job search for a period of four weeks or more.

Category 3: Plant closing/substantial layoff

Definition of closing of a plant, facility, or enterprise: The closing of any business, building, or unit within a company regardless of size.

Definition of Substantial Layoff at a plant, facility, or enterprise: A substantial layoff is an announced reduction in labor force which results in an employment loss at a business, building, or business unit for:

- At least 25% of employees OR
- Please note that a substantial layoff can encompass employees who work from home or in different locations as long as are part of an employment loss that meets one of the above conditions.

Category 4: Plant Closing - general announcement

General announcement means a company has announced a facility closure but the worker has not received written notice of the closure.
Category 5: Previously self-employed but unemployed due to economic conditions or natural disaster

- Self-employed means the individual owned his or her own business. Performing casual labor does not meet the definition of self-employed under this category.

- Unemployed as a result of general economic conditions means the business failed because expenses exceeded or barely covered income.

- A natural disaster is any event or force of nature that has catastrophic consequences, such as avalanche, earthquake, flood, forest fire, hurricane, lightning, tornado, tsunami, and volcanic eruption.

Category 6: Displaced Homemaker Definition of Displaced Homemaker:

Providing unpaid services to family members in the home means: ? The individual resided in the home with family member(s) and ? provided care, housekeeping, and related homemaking services for family member(s)

Dependent on the income of another family member is defined as: An individual who, for six (6) months or more, has relied upon another family member for more than one half of the household income. Individuals who have been dependent on public assistance do not meet the definition of a Displaced Homemaker.

Definition of Dependent Spouse of an Active Duty Armed Forces Member: Dependent spouse of a member of the Armed Forces member means a lawful husband or wife who is/was the spouse of a member of the Armed Forces and who is/was substantially dependent on the income of the Armed Forces member. Lawful husband or wife includes a partner acquired through a legal Civil Union or a common-law husband or wife if the common-law relationship was established in a state that recognizes such relationships as valid.

Definition of Active Duty: The term “active duty” means full-time duty in the active military service of the United States. Such term includes full-time training duty, annual training duty, and attendance, while in the active military service, at a school designated as a service school by law or by the Secretary of the military department concerned. Such term does not include full-time National Guard duty.

Definition of Deployment: A member of the armed forces shall be considered to be deployed or in a deployment on any day on which, pursuant to orders, the member is performing service in a training exercise or operation at a location or under circumstances that make it impossible or infeasible for the member to spend off-duty time in the housing in which the member resides.

Definition of Call to Order to Active Duty: A call or order to active duty means a provision of law during a war or during a national emergency declared by the President or Congress.

Definition of Service-Connected: The term “service-connected” means, with respect to disability or death, that such disability was incurred or aggravated, or that the death resulted from a disability incurred or aggravated, in line of duty in the active military, naval, or air service.
Definition of Significant Reduction in Family Income: Significant reduction in family income means the family income has been reduced by 20%.

Definition of Underemployed: Underemployed means an individual who is working part-time but is seeking full-time (35+ hours/week) employment; OR

? an individual who is working full-time but whose current annualized wage rate, in relation to family size, does not exceed the higher of either the poverty level or 70% of the lower living standard income level; OR

? an individual who is working but whose current employment does not match former wages and/or skill level; OR

? an individual who is working but whose job does not match his or her educational level.

Experiencing difficulty in obtaining employment means: An individual has looked for employment for a minimum of four weeks and has been unable to find work

Experiencing difficulty in upgrading employment means: ? The individual has been unable to secure full-time employment; OR

? The individual has attempted but been unable to find work at a higher level

Category 7: Spouse of an active duty armed forces service member who is unemployed due to change in duty station

? The Armed Forces Member must be on active duty. See the definition of active duty under Category 6.

? Spouse is defined as a lawful husband or wife who is/was the spouse of a member of the Armed Forces on active duty. Lawful husband or wife includes a partner acquired through a legal Civil Union or a common-law husband or wife if the common-law relationship was established in a state that recognizes such relationships as valid.

Category 8: Unemployed/underemployed spouse of an active duty armed forces experiencing difficulty in obtaining/upgrading employment

? See the definition of spouse under category 7 and definitions of active duty, underemployed, and experiencing difficulty in obtaining or upgrading employment under Category 6.

III. Forms

1. The WIOA-5 (rev.12-15) form, “Eligibility and Certification for Dislocated Workers” is used to certify eligibility for Dislocated Worker status. A copy of the WIOA-5 form is attached to this policy issuance, and is available as a fillable form on-line on the CT DOL website under WIOA. In the verification field on the WIOA-5, please indicate the type of documentation that shows the individual meets the criteria as outlined in this memorandum.

? The original completed and signed WIOA-5 and documentation is retained in the DOL offices.*
A copy of the WIOA-5 is provided to the individual requesting Dislocated Worker certification.

A copy of the completed and signed WIOA-5 with accompanying documentation must also be given to the local One-Stop operator or the local Board or the local Board’s subcontractor, depending on the local agreement, for inclusion in the individual’s file. Please note that if the Dislocated Worker documentation contains the worker’s former employer’s employment registration number (for example a copy of MD20), this number must be blacked out on the copies provided to the local One-Stop operator, local Board, or local Board’s subcontractor.

2. Additionally, a JS/WIOA-1 (rev.12-15) form, “Equal Opportunity is the Law”, must also be completed with a copy provided to the individual. A copy of the JS/WIOA-1 form is attached.

In cases where Dislocated Worker certification originates in an affiliate American Job Center, the original signatures of the claimant and the authorized DOL staff member may reside in two different locations. Having copies of the customer’s and DOL staff member’s signatures is acceptable, provided the original signatures can be obtained if necessary in the event of an audit.

IV. Eligibility Determination Documentation

A complete documentation guide that outlines acceptable documentation for each category is included as an attachment to this memorandum.

Note on the Use of the Self-Certification Form: Self-certification is accepted only where indicated and only when other listed forms of documentation are unavailable, or when obtaining such documentation causes undue hardship to the individual.

V. Dislocated Worker Certification, Redetermination of Certification, and WIOA Participation

To be registered as a WIOA Dislocated Worker participant, an individual must have been certified as a Dislocated Worker within the twelve-month period prior to the date of the first WIOA service.

Once an individual is registered in WIOA as a Dislocated Worker, his or her status as a Dislocated Worker remains intact for the duration of the time he or she is registered in WIOA. WIOA participant status is sealed at the point of WIOA registration.

Individuals certified as Dislocated Workers prior to one year before the date of the first WIOA service are to have eligibility and certification re-determined prior to receiving WIOA services as Dislocated Workers. If nothing has changed since the prior certification, simply complete a new WIOA-5, “Eligibility and Certification for Dislocated Workers” using the prior documentation with updated signatures and certification dates. If the individual had employment since being certified, refer to section VI of this memorandum.

VI. Effect of Interim (including temporary or contract work) and/or Part-time Employment

An individual’s status as a Dislocated Worker will not be affected if that individual accepts interim employment, and/or holds or accepts part-time employment for the purpose of income maintenance provided that:
? the individual has/had the intention of entering into permanent, unsubsidized employment as an employee

AND

? such employment is/was with an employer other than that from which the individual was dislocated. If an individual is temporarily employed at the same company from which he or she was dislocated, the individual is not eligible to receive services until the temporary assignment has ended.

Interim Employment: One of the following three conditions must be met to classify employment as interim employment: 1) The interim employment is characterized as temporary by the employer at the time of hire. Under this condition, there is no time limit on how long the employment lasts. This includes contract work where the worker is deemed “self-employed” for tax purposes; OR

2) The interim employment is outside the individual’s area of training and expertise, and is considerably below his or her highest wage and skill level

Considerably below the individual’s highest wage is defined as less than 80% of the individual’s previous highest wage level.

? Such employment is understood to be transitory, that is one year or less in duration, for the purpose of income maintenance, until the individual can obtain more suitable work.

? The intent is to take the job for income maintenance, not to begin a new career in an entry level position.

Documentation that verifies the wages and the duration of the interim employment must be obtained. Such documentation includes, but is not limited to: ? pay stubs ? a letter from the employer ? the individual’s Unemployment Compensation records

OR

3) The interim employment lasts less than one year in duration. This applies to any employment held by the applicant including work which is similar to his or her previous occupations.

Part-time Employment Part-time work is defined as employment of less than 35 hours per week. Per diem work which is less than 35 hours per week is included in this definition.

Part-time employment, unlike interim employment, may be within the individual’s area of training and expertise. Part-time employment may not be with the employer from which the individual was dislocated.

The individual needs to demonstrate that part-time employment has not precluded him or her from seeking full-time employment.

Documentation that verifies the wages and hours of part-time employment must be obtained. Such documentation includes but is not limited to pay stubs, a letter from the employer, or Unemployment Compensation records.
VII. CTHires Procedures

There are instances in which an individual is certified as a Dislocated Worker but does not start WIOA services, or starts WIOA services more than one year after being certified. Implementation of the following CTHires procedures will ensure that information accurately reflects current data and status and that a proper accounting of DOL-provided services is maintained.

DOL staff must enter a complete Wagner-Peyser registration including work history. In addition, when certifying a Dislocated Worker, DOL staff must enter the following:

On the Activities Tab:

- Click Activity History/Service Plan
- Select “Add multiple services”
- Enter LWIA/Region and office location from drop down menu
- Check the box to the left of Activity 107 -- “Provision of Labor Market Research” and enter the date of the certification in the Scheduled Date area and time
- If the worker attended a Rapid Response orientation session (activity 110), select it and enter a date and time of the orientation (check intranet listing of Rapid Response Early Intervention Sessions) and select a RR event number by searching by company name
- Check the box to the left of Activity 211 -- “Referral to WIOA” and enter the date of the certification in the Scheduled Date area and time
- Select any other services provided
- Under “Case Note”, check add a New Case Note
- Select the date of the certification for contact date
- Enter LWIA/Region and office location
- Under “Subject”, write “Dislocated Worker Certification”
- Under “Case Note Description”, write a case note to briefly, but sufficiently, describe the services provided to the individual. Be sure to include the date and details that reflect the data you entered.

Under Miscellaneous Information Tab on the Wagner-Peyser Application:
- Under Special Program 1, select, “Dislocated Worker”

WIOA staff must enter a complete WIOA registration. The following is a summary of items within the WIOA registration that must be completed for Dislocated Workers:

- Application Date, check Dislocated Worker Eligible, and enter Dislocated Worker Eligibility Date
- Check the Dislocated Worker Eligibility category with appropriate verification
- Enter the date of projected or actual layoff
- Enter attended a Group Orientation (Rapid Response) if applicable
- Enter most Recent Date Attended a Rapid Response Activity if applicable
- Enter Dislocation Event if applicable (by doing a company search)
- Enter Dislocation Employer and address if not populated
- Enter Dislocated Hourly Wage.

VIII. Record Retention

For DOL Dislocated Worker eligibility and certification records are to remain in the DOL offices in a secure location for a period of three years from the date of determination of status as a Dislocated Worker. This includes records of individuals certified as Dislocated Worker but who did not receive WIOA services, and individuals who were determined not to be eligible as Dislocated Workers.

However, according to Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Government, codified at 29 CFR Part 97 Section 97.42, if any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the three-year period, the records must be retained until completion of the action and
resolution of all issues which arise from it, or until the end of the regular three-year period, whichever is later.

For WIBs and Subcontractors – See Separate AP

Questions regarding this issuance should be directed to Susan Fracasso in the Rapid Response Unit at 860-263-6589 or susan.fracasso@ct.gov.


YOUTH INCENTIVES

Incentives are allowable under Workforce Innovation and Opportunity Act of 2014. Incentives are used to provide incentives for recognition and achievement to eligible youth and must be tied to program goals on the youth’s Individual Service Strategy and provided in accordance with the requirements in 2 CFR 200. 20 CFR 681.650

Youth Service Providers are encouraged but not required to provide incentives. Youth Service Providers may determine whether or not to provide an incentive award however if they choose to provide incentive awards they will base the award amount on their fund availability. Incentives, both non-cash and cash incentives must be in an amount that is consistent to each youth receiving an incentive for their achievement; for example if the Youth Service Provider determines that the amount awarded for attainment of one goal is $10, then all youth achieving that goal and receiving an incentive award will receive $10.

Awarding of incentives is a means to encourage participation, achievement and attainment of individual goals that lead to success and completion of a secondary school diploma or its equivalent. Incentives may also be awarded to youth who have successfully completed the WIOA program and obtained full-time unsubsidized employment.

Incentives may be given to youth if the provision of an incentive is included in the participant’s Individual Service Strategy. The ISS should describe the plans for preparing the youth for post-secondary education and/or employment, finding effective connections to the job market and employers, and understanding the links between academic and occupational learning, and setting and achieving goals, and for providing incentives as appropriate to youth who achieve goals. Service providers must also document the plans for providing incentives based upon the youth attaining one or more of the goals described in part II. below in the youth’s case notes. The youth must be an active participant in the WIOA Youth program in order to receive an incentive. § 681.640 Youth incentives may not include entertainment costs such as movie or sporting event tickets or gift cards to movie theaters or other venues whose sole purpose is entertainment. (2 CFR Part 200)

Incentive awards may be non-cash (not redeemable for cash) or cash incentives.

I. Incentives A. Non-cash incentives Examples of the types of items that could be awarded as non-cash incentives include but are not limited to: Gift certificates (restaurants, video, movie passes, retail, and school book stores) Plaques Credentials Cap and gowns Class pictures Class ring School supplies/calculators
B. Cash incentives The cash incentive awarded a participant within a program year (July 1st through June 30th) is limited to $500 for the entire program year.

PROGRAM PERFORMANCE REPORTING REQUIREMENTS

The purpose of this Section is to describe the requirements and methodology for WIOA program performance reporting. The Bureau will report quarterly and annual program performance.

I. Quarterly Performance Reports A quarterly Unemployment Insurance wage extract from ConnecticutWorks will be pulled using participant data in advance of the quarterly due dates. This will enable the Bureau enough time to merge the extract with participant wage data from Connecticut’s Unemployment Insurance system, the Wage Record Interchange System (WRIS), and the Federal Employment Data Exchange System (FEDES) to gather data from other states’ Unemployment Insurance systems and Federal employment databases, respectively.

The Bureau staff will incorporate updated performance levels and reporting periods for performance measures. The Bureau will submit performance reports to ETA as well as provide quarterly individual performance reports to each service provider.

II. Annual Reporting The Bureau will produce the Workforce Investment Act Standardized Record Data (WIASRD) on a quarterly basis.

III. Performance Report Due Dates

Due dates for Federal program performance reporting are as follows: First Quarter: Due approximately November 15 Second Quarter: Due approximately February 15 Third Quarter: Due approximately May 15 Fourth Quarter: Due approximately August 15

Annual Report: Due October 1 WIOASRD: Due October 15

IV. Data Sources for Calculating Performance Levels

A. Unemployment Insurance Wage Records To the extent consistent with State law, the Unemployment Insurance (UI) wage records will be the primary data source for tracking the adult and dislocated worker entered employment, retention, and average earnings measures and the employment portion of the youth placement in employment or education measure.

Unemployment Insurance wage records are not accessible to any agencies that are not part of state government. MCA 39-51-603 restricts the use of wage records and protects the confidentiality of those records. If written permission is obtained from a participant, UI wage and benefit data can be released to the individual or their designated recipient.

Any participant may also visit a local Job Service Workforce Center and request his/her own wage record printout.

B. Additional Wage Records While most forms of employment in a state’s workforce are considered “covered employment,” certain types of employers and employees are excluded by federal UI law or are not covered under state UI law. Record sharing and/or automated record matching with other employment and administrative data sources can be used to determine and document employment and earnings for “uncovered” workers.

Additional wage record data sources include the following: Wage Record Interchange System (WRIS): Connecticut participates in this system and receives wage data for exited participants who move out-of-state. • Federal Employment Data Exchange System (FEDES): Connecticut participates
in this pilot project and receives wage data for exited participants working for the federal
government. Data is available from the Office of Personnel Management, U.S. Postal Service, and
Department of Defense. • Railroad Retirement System: No data is available from this source at this
time. • State government employment records: No data is available from this source at this time. •
Local government employment records: No data is available from this source at this time. • Judicial
employment records: No data is available from this source at this time. • Public school employment
records: No data is available from this source at this time. • State New Hires Registry: No data is
available from this source at this time.

C. Supplemental Data
Supplemental data should be utilized for program management purposes and
to gain a full understanding of program performance and activities. Although a majority of
employment situations will be covered by unemployment insurance (UI) wage records, certain other
types of employment, particularly self-employment, are either “not covered” or the data are very
difficult to access due to confidentiality issues and concerns (e.g., access to tax records). Therefore,
although wage records are the primary data source for any federal employment-related performance
measure, in the absence of wage records, supplemental data can be utilized to demonstrate
outcomes (with the exception of earnings).

If an individual holds two jobs—one covered by Unemployment Insurance and one that is not
covered for reasons stated above—only the “covered” employment will count toward program
performance.

Supplemental data can be utilized to demonstrate outcomes on the Entered Employment Rate for
adults and dislocated workers, the Employment Retention Rate for adults and dislocated workers,
and the placement portion of the Youth Placement in Employment or Education.

Supplemental data cannot be utilized to demonstrate outcomes on the Average Earnings common
measure for adult and dislocated worker populations.

An individual’s desire for entrepreneurial training should not be discouraged simply because the
subsequent employment is not or may not be covered by wage records. In order to convey full and
accurate information on the employment impact of ETA programs, and in order to get appropriate
credit for outcome attainment, supplemental sources of data may be used to document a
participant’s entry and retention in employment for those participants not covered by wage records.

As per USDOL common measures policy (TEGL 17-05, dated 2/17/06), allowable sources of
supplemental information for tracking employment-related outcomes include the following: ? Case
management notes ? Automated data base systems ? Documented contacts with employers ?
Participant surveys. Providers must keep in mind that all supplemental data and methods are to be
documented and are subject to review.

V. Definitions
Employed at Participation - An individual employed at the date of participation who did
any work at all as a paid employee, in his or her own business, profession or farm, worked as an
unpaid worker in an enterprise operated by a member of the family, or is one who was not working,
but has a job or business from which he or she was temporarily absent because of illness, bad
weather, vacation, labor-management dispute, or personal reasons, whether or not paid by the
employer for time-off, and whether or not seeking another job. TEGL 17-05 (2/17/06)

Not Employed at the Date of Participation – An individual is considered not employed at the date of
participation when he/she (a) did no work at all as a paid employee on the date participation occurs,
(b) has received a notice of termination of employment or the employer has issued a WARN or other notice that the facility or enterprise will close, or (c) is a transitioning service member. Employed in Quarter After Exit Quarter - The individual is considered employed if UI wage records for the quarter after exit show earnings greater than zero. UI Wage records will be the primary data source for tracking employment in the quarter after exit. When supplemental data sources are used individuals should be counted as employed if, in the calendar quarter after exit, they did any work at all as paid employees (i.e., received at least some earnings), worked in their own business, profession, or worked on their own farm. Training Services - include WIOA-funded and non-WIOA funded partner-training services. These services include: occupational skills training, including training for nontraditional employment; on-the-job training; programs that combine workplace training with related instruction, which may include cooperative education programs; registered apprenticeships; training programs operated by the private sector; skill upgrading and retraining; entrepreneurial training; job readiness training; adult education and literacy activities in combination with other training; and customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training.

Certificate - A document that is awarded in recognition of an individual’s attainment of measurable technical or occupational skills necessary to gain employment or advance within an occupation. These technical or occupational skills are based on standards developed or endorsed by employers. Credentials awarded by workforce investment boards and work readiness certificates are not included in this definition. Credentials must be awarded by one of the following:

- A state education agency, or a state agency responsible for administering vocational and technical education within a state; • An institution of higher education described in Section 102 of the Higher Education Act (20 USC 1002) that is qualified to participate in the student financial assistance programs authorized by Title IV of that Act. This includes community colleges, proprietary schools, and all other institutions of higher education that are eligible to participate in federal student financial aid programs; • A professional, industry, or employer organization (e.g., National Institute for Automotive Service Excellence certification, National Institute for Metalworking Skills) or a product manufacturer or developer (e.g., Microsoft Certified Database Administrator, Sun Certified Java Programmer) using a valid and reliable assessment of an individual’s knowledge, skills and abilities; • A registered apprenticeship program; • A public regulatory agency, upon an individual’s fulfillment of educational, work experience or skill requirements that are legally necessary for an individual to use an occupational or professional title or to practice an occupation or profession (e.g., Federal Aviation Administration aviation mechanic certification, State-licensed Emergency Medical Technician); • A program that has been approved by the Department of Veterans Affairs to offer education benefits to veterans and other eligible persons; • Job Corps centers that issue credentials; and • Institutions of higher education that are formally controlled, or have been formally sanctioned or chartered by, the governing body of an Indian tribe or tribes.

Post-Secondary Education means a program at an accredited degree-granting institution that leads to an academic degree (e.g., AA, AS, BA, BS). Does not include programs offered by degree-granting institutions that do not lead to an academic degree.

Advanced Training means an occupational skills employment/training program, not funded under Title I of the WIOA, which does not duplicate training received under Title I. Includes only training outside of the One-Stop, WIOA and partner, system, i.e., training following exit.

Basic literacy skills deficient means the individual computes or solves problems, reads, writes, or speaks English at or below the 8th grade level or is unable to compute or solve problems, read,
write, or speak English at a level necessary to function on the job, in the individual’s family, or in society.

High School Diploma Equivalent - a GED or high school equivalency diploma recognized by the State.

Qualified apprenticeship is a program approved and recorded by the ETA/Office of Apprenticeship (OA) or by a recognized State Apprenticeship Agency (State Apprenticeship Council). Approval is by certified registration or other appropriate written credential.

Military service - reporting for active duty.

PERFORMANCE MEASURES

The WIOA Performance Reports (quarterly and annual) will cover participants who receive services financially assisted by formula or statewide reserve funds under the following ETA programs:

- WIOA Adult Program • WIOA Dislocated Worker Program • WIOA Youth Program • National Emergency Grants

I. Adult and Dislocated Worker Performance Measures

Use of the term “adult” in definitions and calculations implies both adult and dislocated worker participants. For participants in the Adult or Dislocated Worker programs, the following performance measures apply:

A. Entered Employment

Methodology:

Of those who are not employed at the date of participation: The number of adult participants who are employed in the 1st quarter after the exit quarter divided by the number of adult participants who exit during the quarter.

Operational Parameters: • Individuals who are employed at the date of participation are excluded from this measure (i.e., programs will not be held accountable for these individuals under this measure).

• Individuals who, although employed, have either received a notice of termination of employment or the employer has issued a Worker Adjustment and Retraining Notification (WARN) or other notice that the facility or enterprise will close, or are transitioning service members are considered not employed and are included in the measure.

• For WIOA purposes, a Transitioning Service Member is defined as a service member in active duty status (including separation leave) who participates in employment services and is within 24 months of retirement or 12 months of separation.

• Employment at the date of participation is based on information collected from the individual, not from wage records.
B. Employment Retention Methodology:

Of those who are employed in 1st quarter after the exit quarter: The number of adult participants who are employed in both the 2nd and 3rd quarters after the exit quarter divided by the number of adult participants who exit during the quarter

Operational Parameters:

• This measure includes only those who are employed in the first quarter after the exit quarter (regardless of their employment status at participation)

• Individuals who are not employed in the first quarter after the exit quarter are excluded from this measure (i.e., programs will not be held accountable for these individuals under this measure).

• Employment in the first, second, and third quarters after the exit quarter does not have to be with the same employer.

C. Average Earnings

Methodology:

Of those adult participants who are employed in the first, second, and third quarters after the exit quarter: Total earnings in the second quarter plus total earnings in the third quarter after the exit quarter divided by the number of adult participants who exit during the quarter.

Operational Parameters: • To ensure comparability of this measure on a national level, wage records will be the only data source for this measure. Acceptable wage record sources are a state’s Unemployment Insurance wage records, Federal employment wage records, military employment wage records, and other administrative records, such as tax records for self-employed participants.

• Individuals whose employment in either the first, second, or third quarters after the exit quarter was determined solely from supplemental sources and not from wage records are excluded from the measure.

II. Youth Performance Measures

The Youth Common Measures replaced the WIOA statutory measures on July 1, 2007. A. Placement in Employment or Education

Methodology: Of those who are not in postsecondary education or employment (including the military) at the date of participation:

The number of youth participants who are in employment (including the military) or enrolled in postsecondary education and/or advanced training / occupational skills training in the first quarter after the exit quarter divided by the number of youth participants who exit during the quarter.

Operational Parameters:
Individuals who are in post-secondary education or employment at the date of participation are excluded from this measure (i.e., programs will not be held accountable for these individuals under this measure).

Employment and education status at the date of participation are based on information collected from the individual.

Individuals in secondary school at exit will be included in this measure.

B. Attainment of a Degree or Certificate

Methodology:

Of those enrolled in education (at the date of participation or at any point during the program):

The number of youth participants who attain a diploma, GED, State approved high school equivalency diploma, or certificate by the end of the third quarter after the exit quarter divided by the number of youth participants who exit during the quarter.

Operational Parameters:

- Education refers to participation in secondary school, post-secondary school, adult education programs, or any other organized program of study leading to a degree or certificate.
- Individuals in secondary school at exit will be included in this measure.
- The term diploma means any credential that the state education agency accepts as equivalent to a high school diploma. TEGL 17-05 clarifies that the term diploma also includes post-secondary degrees including Associate’s Degrees (AA and AS) and Bachelor’s Degrees (BA and BS).
- Diplomas, GEDs, or credentials can be obtained while a person is still receiving services or at any point by the end of the third quarter after the exit quarter.
- Work readiness cannot be accepted under this measure.

C. Literacy and Numeracy Gains

Methodology:

Of those out-of-school youth who are basic skills deficient:

The number of youth participants who increase one or more educational functioning levels divided by the number of youth participants who have completed a year in the youth program (i.e., one year from the date of first youth program service) plus the number of youth participants who exit before completing a year in the youth program.

Operational Parameters:

- In-school youth are excluded from this measure. (Note: determination of in-school or out-of-school status is only made at point of program participation.)
• It is allowable to use pre-tests that are administered up to six months prior to the date of first WIOA youth service, if such pre-test scores are available. If prior pre-tests are not available, administration of the pre-test must occur within 60 days following the date of first youth program service.

• This measure is based on “date of first youth program service” rather than date of participation because date of participation is defined as the earliest date of service from any program if a participant receives services from multiple programs. It is possible for the participation date of a youth to be prior to the date of first WIOA youth service if such a youth was served earlier by a different program. Therefore, date of first WIOA youth service is used to ensure that this measure is based on a “youth participation date” rather than the initial participation date.

• Individuals who are determined not to be basic skills deficient based on pre-test results are excluded from this measure (i.e., programs will not be held accountable for these individuals under this measure).

• When administering assessment tools, individuals with disabilities (as defined in 29 CFR Part 37.4) should be accommodated according to: (1) Section 188 of WIOA: 29 CFR Part 37, Section 504 of the Rehabilitation Act of 1973, and Title H of the Americans with Disabilities Act, (2) guidelines associated with the assessment tool used to determine functioning levels, or (3) state law or policies. Further guidance can be found in TEGL 17-05 under the section called Testing Youth with Disabilities. The measure includes individuals who are given an initial assessment but, either: (1) do not post-test before exiting the program, or (2) exit before completing a year in the youth program (i.e., one year from the date of first youth program service).

• To be included in the numerator, a participant must demonstrate on a post-test that he / she has advanced one or more educational functioning levels beyond the level in which he / she was initially placed at pre-test within one year from the date of first youth program service. (Note: the one-year time period is from date of first youth program service, not the date of pre-test.)

• All out-of-school youth must be assessed in basic reading / writing and math.

The Tutoring/Study Skills service can be used to help out-of-school youth who are basic skills deficient. In ConnecticutWorks, this service falls under the Youth Services objective.

III. Customer Satisfaction Measures Customer Satisfaction measures are utilized to assess WIOA provider / WIOA participant and WIOA provider / WIOA employer customer relationships:

• Participant Satisfaction: a weighted average of numerical survey responses used to determine the extent to which WIOA providers are meeting participant needs.

• Employer Satisfaction: a weighted average of numerical survey responses used to determine the extent to which WIOA providers are meeting employer needs.

IV. State Displaced Homemaker Program Performance There are no mandatory performance standards for the State Displaced Homemaker (SDH) program, however the State determined that entered employment rate and wage at placement data should be collected. Performance information is provided to the Governor and the Legislature upon request.

Performance Measures and Goals Measure Goal Entered Employment Rate 75% Wage at Placement $9.00
State Displaced Homemaker performance is not included in the Workforce Investment Act performance measures and customer satisfaction surveys are not conducted on SDH exited participants unless they are co-enrolled in WIOA programs.

VI. Performance Levels


PROGRAM PARTICIPATION AND EXIT UNDER COMMON MEASURES

I. Point of Participation for Common Measures Reporting

A. What is the definition of a participant? A participant is an individual who is determined eligible to participate in the program and receives a service funded by the program in either a physical location (One-Stop Career Center or affiliate site) or remotely through electronic technologies.

B. When does program participation occur? Following a determination of eligibility (if required), participation in a program commences when the individual begins receiving a service funded by the program or a partner program, consistent with Connecticut’s policy of utilizing a common participation date across core workforce programs. This phrase has the same meaning as the “date of participation” used in some of the measures. If the participant receives services from multiple programs, then Connecticut uses the earliest date of service as the “date of participation” when reporting on the measures in each program.

Operational Parameters:

1. Eligibility guidelines will determine whether an individual is eligible to participate in a WIOA program.

2. The phrase “determined eligible to participate in the program” under WIOA does not apply to individuals who receive core services in a self-service, facilitated self-help, or staff-assisted function funded by the Wagner-Peyser Act. These individuals are considered participants and are included in the Wagner-Peyser Act performance accountability system.

3. Individuals who are age 18 or older who only receive WIOA-funded self-service or informational activities are to be counted as participants under the WIOA Adult program. Their treatment under the WIOA performance accountability system is covered in Section 8 of TEGL 17-05.

4. Individuals eligible to participate in the WIOA Dislocated Worker program who only receive WIOA-funded core services, including self-service or informational activities, are to be counted as participants under the WIOA Dislocated Worker program. Their treatment under the WIOA performance accountability system is covered in Section 8 of TEGL 17-05.

5. An individual may be participating in several programs simultaneously and may be counted as a participant in each of those programs. For example, a customer who accesses information on a computer purchased / leased from one funding stream and who is assisted by an employee who is paid from yet another funding stream may be considered as a participant in both funding streams, as appropriate, and with consideration to the programs’ eligibility definitions.
6. Self-directed job search is a service and individuals who use self-directed tools for job search are participants. Please note that self-directed job search alone does not initiate participation in the WIOA Youth program.

7. In accordance with the Workforce Innovation and Opportunities Act, receipt of post-employment follow-up services designed to ensure job retention, wage gains, and career progress does not result in the commencement of a participation period.

8. Examples of other services and activities that do not commence participation in a program include the following:

   a. Determination of eligibility to participate in the program; b. Caseload management activities of an administrative nature that involve regular contact with the individual or employer to obtain information regarding his / her employment status, educational progress, or need for additional services; c. Income maintenance or support payments (e.g., Unemployment Insurance (UI) benefit payments, Temporary Assistance for Needy Families (TANF), other cash assistance, Food Stamps, and subsidized childcare). Connecticut will assure that UI claimants will be actively engaged in the search for new employment while they receive UI benefits and that the workforce system will provide reemployment services and job search assistance to speed their return to work. d. Individuals who visit a physical location for reasons other than its intended purpose (e.g., use of restrooms or ask staff for directions) are not participants.

II. Point of Exit for Common Measures

A. What is the definition of program exit? The term program exit means a participant has not received a service funded by the program or funded by a partner program for 90 consecutive calendar days, has no gap in service, and is not scheduled for future services. The exit date is the last date of service.

Connecticut has the capability to track participant services across the DOL-funded required One-Stop partner programs until the individual exits all services.

The phrase “and is not scheduled for future services” does not apply to a participant who voluntarily withdraws or drops out of the program. In these circumstances, once a participant has not received any services funded by the program or a partner program for 90 consecutive calendar days, the date of exit is applied retroactively to the last day on which the individual received a service funded by the program or a partner program.

B. Are there any exceptions to the definition of exit? A participant should not be considered as exited if there is a gap in service of greater than 90 days in one of the following circumstances: 1. Delay before the beginning of training;

2. Health / medical condition or providing care for a family member with a health / medical condition;

3. Temporary move from the area that prevents the individual from participating in services, including National Guard or other related military service.

A gap in service must be related to one of the three circumstances identified above and last no more than 180 consecutive calendar days from the date of the most recent service to allow time to address the barriers to continued participation. However, case managers may initiate a consecutive
gap in service of up to an additional 180 days for the participant that follows the initial 180-day period to resolve the issues that prevent the participant from completing program services that lead to employment. Case managers must document all gaps in service that occur and the reasons for the gaps in service, including the participant’s intent to return to complete program services.

C. Common Exit Operational Parameters: 1. In accordance with the Workforce Innovation and Opportunities Act, receipt of post-employment follow-up services designed to ensure job retention, wage gains, and career progress do not count as a service that would extend the participation period. Such follow-up services that do not extend the period of participation could include, but are not limited to: additional career planning and counseling; contact with the participant’s employer, including assistance with work-related problems that may arise; peer support groups; information about additional educational opportunities; informational mailings; and referral to supportive services available in the community. Although these services will not extend the participation period or delay program exit, case managers are reminded that these services may have a direct and positive impact on the employment retention and wage gains of participants who enter employment.

2. Examples of other activities that do not extend the period of participation or delay program exit include the following:

- Determination of eligibility to participate in the program;
- Caseload management services and any other required administrative case load management activities that involve regular contact with the participant or employer to obtain information regarding the participant’s employment status, educational progress, or need for additional services;
- Income maintenance or support payments (e.g., Unemployment Insurance (UI) benefit payments, Temporary Assistance for Needy Families (TANF), other cash assistance, Food Stamps, and subsidized childcare). Connecticut will assure that UI claimants will be actively engaged in the search for new employment while they receive UI benefits and that the workforce system will provide reemployment services and job search assistance to speed their return to work. However, trade readjustment allowances and other needs-related payments funded through the Trade Adjustment Assistance (TAA) program, WIOA, or National Emergency Grants are elements of a training program that delay program exit because these allowances and payments are tied to continuous participation in skills training.

D. When does exit from the program occur? Once a participant has not received any services funded by the program or a partner program for 90 consecutive calendar days, has no gap in service, and is not scheduled for future services, the date of exit is applied retroactively to the last day on which the individual received a service funded by the program or a partner program. If the participant receives services from multiple programs, then the last or most recent date of service will be the “date of exit” for use in reporting on the measures in each program.

Connecticut coordinates service tracking through ConnecticutWorks for the required DOL funded One-Stop partner programs. This enables the state to provide accountability under the common measures when the participant has exited all services funded by these programs.

III. Exclusions from Common Measures Occasionally, circumstances arise that are beyond the control of both the participant and the program and are expected to last for an undetermined period beyond 90 days. The intent here is to identify a common list of specific circumstances as to when a participant can be excluded from common measures. A participant in any of the following categories, either at the time of exit or during the three-quarter measurement period following the exit quarter, will be excluded from common measures:
• Institutionalized – The participant is residing in an institution or facility providing 24-hour support, such as a prison or hospital, and is expected to remain in that institution for at least 90 days. This reason does not apply to individuals with disabilities (as defined in 29 CFR 37.4) residing in institutions, nursing homes, or other residential environments; individuals participating in the Responsible Reintegration of Youthful Offenders program; and individuals participating in the Prisoner Reentry Initiative. • Health/Medical or Family Care – The participant is receiving medical treatment or providing care for a family member with a health / medical condition that precludes entry into unsubsidized employment or continued participation in the program. This does not include temporary conditions or situations expected to last for less than 90 days. • Deceased • Reserve Forces Called to Active Duty – The participant is a member of the National Guard or a military Reserve unit and is called to active duty for at least 90 days. • Relocated to a Mandated Program – For youth participants only, the participant is in the foster care system or another mandated (residential or non-residential) program and has moved from the area as part of such a program. This does not include relocation to a Job Corps center. • Invalid or Missing Social Security Number – Because the measures require a match of personally identifiable client records with wage and other administrative data in order to obtain outcome information, those participants who do not voluntarily disclose a valid social security number will be excluded from all performance measures.

WIOA DATA SOURCES

This section describes data sources and methods to collect data for the common measures. The data source(s) applicable to each measure are as follows:

PERFORMANCE MEASURE DATA SOURCES

Adult Measures Entered Employment Wage records and CTHires Retention Wage records and CtHires Average Earnings Wage Records

Supplemental sources (only for grantees that do not have access to wage records) Youth Measures Placement in Employment or Education Wage records and supplemental data sources for placement in employment and military

CTHires Attainment of a Degree or Certificate CTHires Literacy and Numeracy Gains CTHires

A. Wage Records

To ensure comparability of the common measures on a national level, wage records are the primary data source for the employment-related measures (except as noted in this section).

1. Unemployment Insurance Wage Records To the extent it is consistent with state law, UI wage records will be the primary data source for tracking the adult entered employment, retention, and earnings measures and the employment portion of the youth placement in employment or education measure. UI wage records include private sector, non-profit sector, and government employer wage reports such as: • State government employment records • Local government employment records • Judicial employment records • Public school employment records

2. Additional Wage Records While most forms of employment in a state’s workforce are “covered” and will be in the UI wage records as noted above, certain types of employers and employees are excluded by Federal UI law or are not covered under states’ UI laws. States may use record sharing and / or automated record matching with other employment and administrative data sources to determine and document employment and earnings for “uncovered” workers.
Additional wage record data sources include the following: • Wage Record Interchange System (WRIS) • U.S. Office of Personnel Management (OPM) • U.S. Postal Service • U.S. Department of Defense • Railroad Retirement System • State New Hires Registry • State Department of Revenue or Tax (for individuals who are self-employed, information must be obtained through record-sharing or automated matching of state tax records).

ETA, in collaboration with the Office of Personnel Management, U.S. Postal Service, and the Department of Defense, has created a pilot data exchange system to provide access for all states to federal and military employment wage record information. The pilot data exchange program is called the Federal Employment Data Exchange System (FEDES) and Connecticut participates in this program.

B. Supplemental Sources of Data

Supplemental data will be used for program management purposes and to gain a full understanding of program performance and activities. Although a majority of employment situations will be covered by wage records, certain other types of employment, particularly self-employment, are either excluded from the sources of data identified under Subsection A above or very difficult for grantees to access due to data confidentiality (e.g., access to State Department of Revenue or Tax records).

Grantees should not be discouraged from providing entrepreneurial training or assisting the hard-to-serve simply because the subsequent employment is not covered by wage records. Therefore, in order to convey full and accurate information on the employment impact of ETA programs, grantees may use supplemental sources of data to document a participant's entry and retention in employment for those participants not covered by wage records.

Allowable sources of supplemental information for tracking employment-related outcomes include case management notes, automated database systems, One-Stop operating systems' administrative records, surveys of participants, and contacts with employers. All supplemental data and methods must be documented and are subject to audit.

Supplemental data needs to be entered in the ConnecticutWorks WIOA Follow-Up screen to ensure it will be used when calculating performance.

See Section 4.110, Follow-Up Services and Activities for more information relating to requirements for supplemental data.

C. Administrative Records

Administrative records will be the data source for the education and training portion of the placement in employment or education measure and the attainment of a degree or certificate measure. All data and methods used to determine placement in education and training or achievement of a degree or certificate must be documented and are subject to audit.

1. Placement in Post-Secondary Education or Advanced Training / Occupational Skills Training

The following data sources can be used to determine whether participants in youth programs are placed in post-secondary education and / or advanced training / occupational skills training:

a. Case management notes and surveys of participants to determine if the individual has been placed in post-secondary education and / advanced training / occupational skills training; or
b. Record-sharing agreements and / or automated record matching with administrative / other data sources to determine and document that the participant has been placed in post-secondary education and / or advanced training / occupational skills training. These data sources may include:

- State boards governing community colleges
- State boards governing universities
- State education associations
- Integrated post-secondary or higher education reporting units
- Training institutions / providers

2. Degree or Certificate The following data sources can be used to determine whether participants in youth programs attain degrees or credentials:

a. Document in case management notes that the individual has received a degree or credential. For data validation purposes, required documentation in the participant file includes the following sources:
   - Transcripts
   - Credentials
   - Diploma
   - Letter from school system
   The date on the degree or certificate must match what is entered in CTHires.

b. Record-sharing agreements and / or automated record matching with administrative / other data sources to determine and document that the participant has received a degree or certificate. These data sources may include:

- State boards of education
- State boards governing community colleges
- State boards governing universities
- State licensing boards for private schools
- State education associations
- Integrated post-secondary or higher education reporting units
- State Department of Professional or Occupational Regulation (possibly other units such as health care administration or specific boards like the “Board of Nursing”)
- Professional, industry, or employer organizations or product manufacturers or developers
- Training institutions / providers
- Adult Basic Education providers (GED or State approved High School Equivalency Certificate / equivalent testing agencies)

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. Section 1232g; see the Act’s regulations at 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive U.S. Department of Education funds and may restrict access to a participant’s education outcome information. Grantees are encouraged to contact the Department of Education at (202) 260-3887 (voice), or visit the ED.gov website at http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html for further assistance.

REPORTING DIFFERENCES

Distinctions between Reporting under the WIOA Performance Accountability System and Reporting under Common Measures:

Differences In Reporting And Accountability For Adults And Dislocated Workers: One of the purposes for the introduction of common measures was to more accurately reflect the true number of individuals who benefit from the One-Stop system. ETA recognizes that states are dedicating significant resources to ensuring that services (including core self-service and informational activities) are available to remote customers who access the workforce investment system via electronic technologies. ETA intends to provide Congress, the public and other interested stakeholders with more complete and accurate information on participation levels and types of services being provided through the nation’s workforce investment system, including data on customers who access services via electronic technologies. However, confusion still exists as to when an individual receiving a program-funded service must be included in performance
calculations. This confusion has resulted in a significant undercount of the number of individuals who benefit from funded services, as well as a distorted view of system outcomes, efficiency, and efficacy of WIOA, Wagner-Peyser Act, Jobs for Veterans Act, and other programs. The following sections seek to distinguish participants who need to be included in the common measures participant counts from participants who need to be included in performance calculations for WIOA and other programs.

A. Who needs to be reported in the common measures participant counts?

ETA’s policy requires state workforce agencies (SWAs) to report, in the appropriate participant counts, all individuals who have been determined eligible and receive and receive and service, including self-service and informational activities, in either a physical location (One-Stop Center or affiliate site) or remotely through electronic technologies.

B. Who needs to be included in the performance measures calculations?

All participants who receive a core, intensive, or training service who exit the program are to be included in performance measures calculations, except that Section 136 of WIOA expressly excludes WIOA adult and dislocated worker program participants who only receive self-service or informational activities from performance calculations.

The exclusion of participants receiving only self-service or informational activities from the WIOA performance calculations has been a major source of confusion and misrepresentation at the state and local level, and has resulted in large numbers of participants being improperly excluded from the outcome performance calculations. ETA is clarifying its interpretation of self-service and informational activities in order to promote greater accountability and consistency among states in their performance computations for the WIOA Adult, Dislocated Worker, Wagner-Peyser Act, Jobs for Veterans Act, and Trade Act programs.

1. Self-Service and Informational Activities According to 20 CFR 666.140(a)(2), self-service and informational activities are those core services that are made available and accessible to the general public; that are designed to inform and educate individuals about the labor market, their employment strengths and weaknesses, and the range of services appropriate to their situation; and that do not require significant staff involvement with the individual in terms of resources or time.

ETA interprets the critical terms above as follows:

Self-service occurs when participants serve themselves in accessing workforce investment system information and activities in either a physical location, such as a One-Stop Career Center resource room or partner agency, or remotely via the use of electronic technologies.

Informational activities in a workforce investment setting may include both self-services and staff-assisted core services that are designed to inform and educate a participant about the labor market and to enable a participant to identify his or her individual employment strengths, weaknesses, and the range of services appropriate for the individual. The exception is core services that require significant staff involvement, as described below.

2. Clarification of Significant Staff Involvement Significant staff involvement is fundamental to determining if a participant will be considered in performance calculations. The critical distinction is
determining when a participant has received a level of service that requires significant staff involvement.

Significant staff involvement in a workforce investment setting is any assistance provided by staff beyond the informational activities described above regardless of the length of time involved in providing such assistance. Significant staff involvement includes a staff member’s assessment of a participant’s skills, education, or career objectives in order to achieve any of the following: • Assist participants in deciding on appropriate next steps in the search for employment, training, and related services, including job referral; • Assist participants in assessing their personal barriers to employment; or • Assist participants in accessing other related services necessary to enhance their employability and individual employment related needs.

A participant who receives this level of service has received a service that involves a significant level of staff involvement; therefore, this participant would be included in the performance measures calculations.

On the other hand, when a staff member provides a participant with readily available information that does not require an assessment by the staff member of the participant’s skills, education, or career objectives, the participant is a recipient of informational activities. This includes information such as labor market trends, the unemployment rate, information on businesses that are hiring or reducing their workforce, information on high-growth industries, and occupations that are in demand.

A participant is also a recipient of informational activities when a staff member provides the participant with information and instructions on how to access the variety of other services available in the One-Stop Career Center, including the tools in the resource room.

A participant who only receives this level of service has not received a service that involves a significant level of staff involvement; therefore, he/she is a participant who would be excluded from the performance measures calculation.

See Attachment D of TEGL 17-05 (Common Measures Policy) for additional guidance on the critical distinction discussed above.

3. Inclusion of Participants in Performance Calculations by Program Although the WIOA Adult and Dislocated Worker program participants who access or receive only self-service or informational services are excluded in the WIOA performance calculations, these participants should be included in the Wagner-Peyser Act reporting and performance calculations to the degree that Wagner-Peyser Act funds contributed to the core employment and workforce information services received.

In accordance with policy principles in TEGL 17-05, if a participant is served by a specific funding stream, he/she will be counted as a participant in that funding stream’s reporting system and/or performance calculations. For example, Wagner-Peyser Act funds are often used to support and maintain One-Stop Career Center operations, electronic tools, job banks, and workforce information services. In these situations, it would be appropriate to include participants who accessed or received Wagner-Peyser Act-funded services in the Wagner-Peyser Act performance accountability system. Where WIOA program funds are used in similar ways, participants who receive self-service or informational activities would only be included in the WIOA participant and services counts, but would not be counted in the WIOA performance measures.
The Statewide Workforce Programs Bureau is accountable for assuring uniform application of ETA policy and is available to assist local service providers in making these determinations.

DATA ELEMENT VALIDATION

The goal of the Workforce Investment Act (WIA) program is to help participants enter suitable employment or educational opportunities and to be retained in those opportunities. States submit WIA Standardized Record Data (WIASRD) records and quarterly and annual performance reports to the Employment and Training Administration (ETA). This submission helps ETA determine the success of the WIA program in achieving its goal.

The accuracy and reliability of program reports submitted by states and grantees using Federal funds are fundamental elements of good public administration, and are necessary tools for maintaining and demonstrating system integrity.

I. Data Element Validation ETA requires states to validate the accuracy of their annual submissions to ensure that ETA decisions about WIA policy and funding are made based on a true picture of program outcomes. The process used is called “data element validation” and is done on an annual basis. When conducting data element validation, key data elements in a sample of WIA participant records are compared to source documentation to ensure that the state uses accurate data to generate its quarterly, annual, and WIASRD submissions.

The Bureau is required to conduct annual “Data Element Validation” for WIA Title 1B Adult, Dislocated Worker, National Emergency Grant, and Youth programs. Data element validation does not apply to the State Displaced Homemaker program.

Data element validation is conducted to ensure data quality and data integrity. Results of the annual data validation review will compare state performance to performance goals. If Connecticut’s validation does not pass this process within acceptable error limits, future funding for WIA programs could be cut. Results of data element validation will be shared with service providers.

Data element validation is not the same as MIS monitoring, although much of the same data is reviewed. MIS monitoring is conducted for a specific program year, and the review includes both active participants and participants exited during that program year. MIS monitoring helps ensure that correct information is being captured for performance reporting and future data element validation.

Data element validation is conducted at each service provider location. The Bureau produces a data extract from ConnecticutWorks based solely on exited participant data from a three-year period. There are many fields checked in data element validation.

Each data element is listed on a data validation worksheet and marked as “pass” or “fail,” depending on supporting documentation for the data element.

One positive result of the data validation process will be the detection and identification of specific problems with ConnecticutWorks reporting, which enables the Bureau to correct data collection and data entry problems. Once the problems are corrected, the process ensures that critical performance data used to distribute performance incentive funds and sanction poor performance are reasonably accurate by calculating an error rate for selected data elements. Clean data also allows the US
Department of Labor and the Bureau to better analyze the causes of performance successes and failures.

Many fields checked in data element validation come directly from the WIA Application. It is critical to have the WIA Application totally completed and signed by the participant.

To view the data validation for Adult, Youth and Dislocated Worker programs go to Data Validation Instructions in the WIA Navigation section on DLI’s website at http://wsd.dli.mt.gov/wia/wiamanual_coverpage.asp

An example of forms used for data validation can be found in Section 12, Appendices of the policy manual.

II. Data Validation Schedule Data Element Validation review period in service provider offices: October-January Data Element Validation: Due to USDOL February 1 each year

QUALITY CONTROL

I. EXPECTATIONS Connecticut receives WIOA funding from the Employment and Training Administration (ETA) based on achieving negotiated performance. ETA’s expectations are that work is done in a timely manner and correctly reported on a quarterly basis. ETA reserves the right to sanction any state that does not meet negotiated performance or reporting is consistently incorrect, as verified through the data validation process.

Many aspects of daily work for WIOA programs affect performance reporting for WIOA programs. As part of quality control, the Bureau will review these functions to determine whether service providers are adequately and appropriately meeting deadlines and documentation requirements.

A. Data Entry Timely data entry affects performance reporting and WIOA Administrative staff workload if information needs to be backdated in the CTHires system. The automated system has built in acceptable time frames as follows: • 30 Days from the time the application is submitted until participation must be created. • Activities are system closed following 90 days without service. • Case closure occurs following 90 days of service activity

B. Correct Data Entry Correct data entry affects performance reporting and Bureau staff resources assigned to make corrections to data in CTHires. Data entry problems include missing fields from the WIOA Application. The WIOA Application is the only source of documentation for many fields required for quarterly reporting to ETA. ETA compiles statistics on demographic data for different WIOA populations to determine how they are effectively being served through the program. Incorrect data skews these statistics and does not show an accurate representation of service to WIOA participants.

Although the CTHires VOS system incorporates a number of Wizards to aide in reducing data entry issues all data should be carefully checked before hitting the Save button to ensure that it is correct.

C Appropriate Documentation Many elements of WIOA enrollment require appropriate documentation be placed in participant files. Documentation sources can be identified on the WIOA Application or the program Verification Worksheets. Missing documentation will be identified during monitoring visits. Documentation should either be stored in the participant file or available online in the CTHires system as a scanned or uploaded document.
D. Credential Entry The Youth program “Attainment of a Degree or Certificate” performance measure requires entry of a credential attained during the participant’s enrollment or within three quarters after exit. Credentials must be documented using a transcript, certificate, diploma, or a letter from an appropriate school system. If there is not a specific date on the credential (i.e., May 2009), the actual date must be case noted. The credential must be entered on the Follow-Up tab in ConnecticutWorks. If not entered in this area, credentials will not be counted for performance reporting. Deficiencies in credential entry will be identified through quarterly reporting and monitoring.

There is no performance measure relating to attainment of a credential for Adult or Dislocated Worker performance. However, attainment of a credential is a data element required for quarterly reporting for these programs. Credentials earned by Adult and Dislocated Worker participants must be entered on the Follow-Up tab in ConnecticutWorks. Deficiencies in credential entry will be identified through monitoring.

E. Literacy/Numeracy Pre-tests The Youth program “Literacy and Numeracy” performance measure requires that all out-of-school youth participants complete Math and Reading pretests to determine whether they are basic skills deficient.

All pre-tests must be administered within 10 working days of enrollment in the WIOA Youth program. In extenuating circumstances, a waiver may be requested from the Youth program manager to extend the date of the pre-test. Case managers must request a waiver within ten days of enrollment.

NOTE: Service providers may use accepted pre-tests that are administered up to six months prior to the date of first WIOA youth service, if such pre-test scores are available. Documentation of testing must be placed in the participant’s file including the test copy original. (Copies may be scanned or uploaded into the CTHires system)

No money will be spent on out-of-school youth participants until the pre-test has been administered.

Providers who fail to administer the pre-test within the prescribed timelines will be subject to corrective action. Deficiencies in completing pre-tests will be identified through quarterly performance reporting and monitoring.

F. Literacy/Numeracy Posttests Post-testing at various intervals is required to determine if a participant has attained a gain of at least one educational functioning level compared to the pre-test. The Youth program “Literacy and Numeracy” performance measure requires that all out-of-school youth participants complete Math and Reading post-tests if they were determined to be basic skills deficient after completing a pre-test.

• Out-of-school youth who are basic skills deficient and have pre-tested must be post-tested at least once by the end of year one following the individual’s date of first youth program service. • It is recommended that the participant be provided 60 hours of remediation to help them achieve an educational functioning level gain. • Youth participants do not need to post-test in the subjects that they achieve at least a ninth grade level on a pretest. • For participants who have completed one year following the date of first youth program service, if more than one assessment is administered after the initial test, the latest assessment within one year of first youth program service will be used to determine if the participant has demonstrated an increase in at least one educational functioning level.
A monthly report will be sent to each provider to remind them that post-tests are due. The report shows which participants are required to be post-tested within three months prior to the anniversaries of their first youth service. Deficiencies in completing post-tests will be identified through quarterly performance reporting and monitoring.

No money will be spent on out-of-school youth participants if the scheduled post-test has not been taken within the required timelines.

G. Follow-Up Contact Follow-up information is used for performance reporting in cases where Unemployment Insurance or federal wage records are not found. Follow-up contact is required for all Youth participants, and for Adult and Dislocated Worker participants who exit to employment. Follow-Up contact information can be used for three Common Measures performance measures: • Entered Employment: Follow-up contact is used for participants employed during the first quarter after exit (Adult, Dislocated Worker, and National Emergency Grant performance). • Employment Retention: Follow-up contact is used for participants employed during the first, second, and third quarters after exit (Adult, Dislocated Worker, and National Emergency Grant performance). • Placement in Employment or Education: Follow-up contact is used for Youth participants who are in employment or post-secondary education/advanced training/occupational skills training during the first quarter after exit. Follow-up contact is required to be entered on the Follow-Up tab in ConnecticutWorks. It will not be reported properly if it is entered in any other area in ConnecticutWorks. To be considered valid, a comment should be entered in the Comments section on the Follow-Up tab for each follow-up contact.

The comment should state the employer name, address, phone number, and job title if the participant is employed. If the participant is in some type of training after being exited, a brief description should be entered in the Comments section.

Follow-Up contact (this is a follow-up activity) is the only source for verifying that a Youth participant is in some type of training after they are exited from the WIOA Youth program. Therefore, it is very important that this information be entered on the Follow-Up tab in ConnecticutWorks.

Deficiencies in completing follow-up contact will be identified through monitoring.

H. Youth Component Services Federal reporting to ETA requires reporting the most recent date a Youth component service is provided. The most recent date of youth services was added to reporting requirements for the quarterly WIASRD in 2013. There has been no way to capture the most recent date services are provided. To ensure that the information will be captured, the Task function on the employment plan in ConnecticutWorks must be used to show that Youth services are being provided. The task must be related to the service by showing a brief description of the service being provided. A case note then needs to be entered to provide details of how the service was provided. Reporting requirements for Youth component services include the following categories: • Most recent date received educational achievement services: Educational achievement services include, but are not limited to: o Tutoring; o Study skills training o Instruction leading to secondary school completion, including dropout prevention strategies o Occupational Skills Training Open as many tasks as necessary to show provision of services. • Most recent date participated in alternative school: Alternative school services are those provided to a youth by a separate program within a K-12 public school district or charter school through a specialized, structured curriculum. Open as many tasks as necessary to show provision of services. • Most recent date received summer employment opportunities: Summer employment opportunities must be directly linked to academic and occupational learning. Open as many tasks as necessary to show provision of services. • Most
recent date participated in work experience: Work experiences may be paid or unpaid and include internships and job shadowing. Work experience is a planned, structured learning experience that takes place in an employer’s workplace (private for profit, non-profit, or public sector) for a limited period of time. Open as many tasks as necessary to show provision of services.

• Most recent date received leadership development opportunities: Opportunities that encourage responsibility, employability, and other positive social behaviors include, but are not limited to: o Exposure to post-secondary educational opportunities; o Community and service learning projects; o Peer-centered activities, including peer mentoring and tutoring; o Organizational and team work training, including team leadership training; o Training in decision making, including determining priorities; and o Citizenship training, including life skills training such as parenting, work behavior training, and budgeting of resources. Enter task when service opened.

• Most recent date received supportive services: Support services for youth participants include: o Linkages to community services; o Assistance with transportation; o Assistance with child care and dependent care; o Assistance with housing; o Referrals to medical services; and o Assistance with uniforms or other appropriate work attire and work-related tools, including such items as eye glasses and protective eye gear. Enter task when service opened.

• Most recent date received adult mentoring services: Adult mentoring services may last for the duration of at least twelve (12) months and may occur both during and after program participation. The Adult Mentoring service is required to be opened on each participant’s employment plan. Open as many tasks as necessary to show provision of services.

• Most recent date received career guidance/counseling services: Comprehensive guidance and counseling and career guidance includes drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of individual youth, and career counseling. Open as many tasks as necessary to show provision of services.

• Most recent date received follow-up services: Follow-up services include: o Regular contact with a youth participant’s employer, including assistance in addressing work-related problems that arise; o Assistance in securing better paying jobs, career development and further education; o Work-related peer support groups; o Adult mentoring; and o Tracking the progress of youth in employment after training. Open as many tasks as necessary to show provision of services. Tasks may be closed when tasks are completed and a corresponding case note has been entered.

II. Deficiency Consequences ETA has the option of sanctioning states for not meeting acceptable performance. Acceptable performance depends on information entered correctly in ConnecticutWorks and appropriate documentation placed in participant files. Deficiencies in any of the above areas will result in a service provider being placed on corrective action. If deficiencies are identified after a provider has been placed on corrective action, a portion of WIOA funding may be revoked.

Please be aware that deficiencies in the requirements listed above can lead to corrective action. Problems with any of the above functions may be identified through monitoring or through day-to-day functions. The Bureau will determine whether there are errors for any of the areas identified above, and whether they are substantial enough to warrant corrective action or possible sanction. The following table shows the progression for determining deficiencies:
Baseline: Yearly monitoring/incidental findings Bureau staff will identify any monitoring findings and discuss these with service providers during exit. Deficiencies will be noted on monitoring reports after onsite review.

Incidental findings will be discussed with service providers as problems are identified. Corrective Action: Second year monitoring/incidental findings Bureau staff will identify monitoring findings that have not been resolved from the previous year’s monitoring or continue to be an issue. Service providers may be placed on corrective action notice if there are unresolved problems or issues that continue to occur. Incidental findings that continue to occur may result in service providers being placed on corrective action. Sanctioning: Year three monitoring/incidental findings Monitoring or incidental findings that have not been resolved from the previous year or continue to occur may result in sanctioning of a service provider.

The Bureau will provide technical assistance to any provider deemed deficient in any of the problem areas identified above. The Bureau may also request technical assistance from USDOL for help in resolving identified problems. Service providers are always encouraged to ask questions or ask for help from the Bureau or any other service provider.

LITERACY/NUMERACY

The Literacy and Numeracy Gains performance measure is outlined in Training and Employment Guidance Letter (TEGL) No. 17-05 and TEGL No. 17-05, Change 2, issued by the Employment and Training Administration of the U.S. Department of Labor.

The literacy and numeracy gains indicator measures the increase in skills of participants through a common assessment tool administered at program entry and regular intervals thereafter. Youth participants for whom the goal of literacy/numeracy gains is most appropriate are those with basic skills deficiencies. Youth participants are basic skills deficient if they have a reading or math levels at or below the eighth grade (9.0 or below).

A. Literacy and Numeracy Gains Performance Measure Operational Parameters The Literacy and Numeracy Gains performance measure is defined in Section 5.20, Performance Measures. There are operational parameters that apply to this measure:

- In-school youth are excluded from this measure.
- Determination of in-school or out-of-school status is only made at point of program participation.
- The term Out-of School Youth is defined as an eligible youth who is not attending any school and not younger than 16 years of age. (WIOA Law Sec. 129 (1) (A). For reporting purposes, this term includes all youth except: those who are attending any school and have not received a secondary school diploma or its recognized equivalent.
- Youth participants included in this measure are basic skills deficient, out-of-school youth in accordance with WIOA law and regulations.

B. Pre-tests ALL out-of-school youth participants must be pre-tested to determine whether they are basic skills deficient.

- All pre-tests must be administered within 10 working days of enrollment in the WIOA Youth program. In extenuating circumstances, a waiver may be requested from the Youth program manager to extend the date of the pre-test. Case managers must request a waiver within the ten days of enrollment.

No money will be spent on out-of-school youth participants until the pre-test has been administered.
Providers who fail to administer the pre-test within the prescribed timelines will be subject to corrective action.

Pre-test scores must be entered in the ConnecticutWorks testing tab with seven (7) working days.

• WIOA Youth service providers will not administer any pre-test prior to the participant’s enrollment in the WIOA Youth program. • Service providers may use pre-tests that are administered up to six months prior to the date of first WIOA youth service, if such pre-test scores are available. The tests have to be an approved type and would have been administered by Adult Basic Education (ABE). • Participants who are determined not to be basic skills deficient based on pre-test results are excluded from this performance measure.

C. Remediation Activities Out-of-school youth participants identified as basic skills deficient must be provided with learning opportunities to gain proficiency in areas where they test poorly. A remediation plan and progress notes are required for out-of-school youth participants who are basic skills deficient.

The remediation plan needs to be documented on the ISS, in case notes and on the CTHires Employment Plan. The plan should show the type of remediation activities being provided and periodic progress toward gaining literacy and numeracy skills. Remediation may be offered through Adult Basic Education centers or by tutors.

• Participants age 16 and over may be provided with an opportunity to attend Adult Basic Education (ABE) Center remediation activities to help them attain proficiencies equivalent to ninth grade level. Enter the Adult Basic/Literacy Services/Tutoring service in CTHires for these participants. • Participants under age 16 cannot be served through ABE centers because of age. Service providers should make remediation activities available to these participants through a tutor. Enter the Tutoring, Study Skills, & Instruction Leading to Completion service in CTHires for these participants. • The hours of remediation that a participant must have before the next test is administered may vary depending on the testing grade level: 1) 30-40 hours of adult education or tutoring for youth that tested higher than a 5th grade level; or 2) at least 60 hours of adult basic education or tutoring for youth testing below a 5th grade level. • If a participant remains in the program, is still basic skills deficient after the first year, and post-testing is conducted at an ABE center, guidelines for remediation activities at the ABE center will be followed. • If the participant remains in the program, is still basic skills deficient after the first year, and will not be post-testing at an ABE center, the participant should be provided additional remediation based on problem areas identified in the testing process. • If the participant is deficient in both reading AND math, remediation activities should be targeted toward only one area during the first year of participation. This allows them to concentrate on one deficiency at a time and helps alleviate the anxiety associated with testing in two separate areas. D. Post-testing Post-testing at various intervals is required to determine if a participant has attained a gain of at least one educational functioning level compared to the pre-test. • Out-of-school youth who are basic skills deficient and have pre-tested must be post-tested at least once by the end of year one following the individual’s date of first youth program service.

• For participants who have completed one year following the date of first youth program service, if more than one assessment is administered after the initial test, the latest assessment within one year of first youth program service will be used to determine if the participant has demonstrated an increase in at least one educational functioning level.
• Individuals who remain basic skills deficient and continue to participate after completing a full year in the program, including pre-test and post-test, must continue to receive basic skills remediation services. These participants will be included in the measure for the first year of participation. They are not included again in the measure until they have completed a second full year in the program. At the completion of the second year, these participants will be included in the measure using the latest post-test score during the second year.

To determine an increase of one or more levels, the participant’s latest post-test score from the second year in the program will be compared to the score from the test that was administered at the latest point during the first year. If an individual remains basic skills deficient following the second year of the program, that individual will be included in the measure a third time if they complete a third full year in the program. This rule applies for the entire time they are in the program. If a participant is still in the program after a third full year, the participant is no longer included in the measure.

• If the participant is deficient in either reading OR math, they need only test in the area of deficiency.
• The post-test testing instrument must be the same type of test that was administered during the pre-test. • Post-test scores must be entered in the CTHires with seven (7) working days.

No money will be spent on out-of-school youth participants if the post-test has not been administered within the appropriate timeline.

E. Literacy and Numeracy Gains To maintain consistency with the implementation of the common measures by the Department of Education (ED), ETA has adopted policies for the ED outcome measure of educational gain, as outlined in the NRS. The NRS was developed by the Department of Education’s Division of Adult Education and Literacy for implementation of an accountability system for federally-funded adult education programs under WIOA Title II.

Out-of-school youth participants must show an increase of one or more educational functioning levels (EFLs) in the areas they are deficient. EFLs are groupings of two to three grade levels.

Under a normal distribution of pre-test scores, most participants’ scores will place the individuals in a range indicating they have completed some of the skills in that particular educational functioning level. Therefore, for a majority of participants, a positive outcome for this measure (i.e., completion of one educational functioning level and an increase to the next level) is not likely to require the equivalent of completing two grade levels, but will average to the equivalent of one grade level.

G. Appendices

1. Appendix F, Educational Functioning Level Descriptors, provides information about Educational Functioning Levels used in Common Measure Reporting.

• There are two sets of educational functioning levels, as outlined in the National Reporting System (NRS) guidelines—six levels for Adult Basic Education (ABE) and six levels for English-as-a-Second-Language (ESL). ABE levels roughly equate to two grade levels. • Each Educational Functioning Level describes a set of skills and competencies that students entering at that level demonstrate in the areas of reading, writing, numeracy, speaking, listening, functional, and workplace skills. These descriptors provide guidelines for placing participants in tests. After a participant has completed a uniform, standardized assessment procedure, programs use these descriptors to determine the appropriate initial ABE or ESL level in which to place students. • If a
participant is functioning at different levels in reading, writing, numeracy, speaking, listening, functional, and workplace areas, the individual is placed in different ABE and ESL levels across the functioning areas. In the post-test assessment, if the participant demonstrates an increase to the next functioning level in any of the areas, he/she has made an educational gain and should be included in the numerator of the Literacy/Numeracy Gains performance measure.

2. Appendix G, Literacy/Numeracy Decision Path, provides a high-level decision path that illustrates the factors determining whether a youth is counted in the numerator (a success), counted only in the denominator, or excluded from the Literacy/Numeracy Gains performance measure.

FISCAL SYSTEM DESIGN

This section is designed to provide the financial and administrative requirements applicable to federally funded programs functioning as required partners in the One-Stop system. This section amplifies the Workforce Innovation and Opportunity Act (WIOA) and the accompanying regulations, clarifies expectations, addresses issues commonly occurring in the field, and provides suggestions and techniques to ensure compliance. It contains the common requirements for grants and financial management found in the OMB Uniform Guidance 2 CFR Part 200 and DOL Exceptions 2 CFR Part 2900. A. References References include the Workforce Innovation and Opportunity Act (WIOA) and regulations promulgated by the U.S. Department of Labor; Circulars of the Office of Management and Budget (OMB); Generally Accepted Accounting Principles; Codes of Federal Regulations (CFR); and One-Stop Comprehensive Financial Management Technical Assistance Guide. References can be accessed at the Department website. Agreements and contracts are generally for the purpose of carrying out the intent of grants and fund sources. Service providers are responsible to maintain books and records for each fund source. This section is designed to provide service providers with fiscal information and forms necessary to comply with the Bureau’s fiscal planning and reporting needs for WIOA programs. B. Precedence of Requirements The Workforce Innovation and Opportunity Act and other federal laws take precedence in the event of a conflict of directives to recipients and service providers. Regulations promulgated under the federal law and regulations, provider agreements and this policy manual guide the programs. Any conflicts of directives should be determined based on the reference source having the greatest precedence. The Bureau reserves the right to update, amend and waive any and all policies in this manual.

COST PRINCIPLES, ALLOWABLE COSTS AND UNALLOWABLE COSTS

The OMB Uniform Guidance 2 CFR Part 200 Subpart E contains the Federal cost principles that define when and how costs can be charged to grants. Even though the circular does not address every possible cost, they are the groundwork for all grant financial management, and grantees and subgrantees should rely on their guidance to avoid audit findings and potential liability.

The following general cost principles, as specified in the circular must be used in determining cost allowability for grants.

A. Costs must be necessary and reasonable. Any cost charged to a grant must be necessary and reasonable for the proper and efficient performance and administration of the grant. A grantee or subgrantee is required to exercise sound business practices and to comply with its procedures for charging costs.

B. Costs must be allocable. A grantee or subgrantee may charge costs to the grant if those costs are clearly identifiable as benefitting the grant program. Costs charged to the grant should benefit only
the grant program, not other programs or activities. In order to be allocable, a cost must be treated consistently with like costs and incurred specifically for the program being charged. Shared costs must benefit both the ETA grant and other work and be distributed in reasonable proportion to the benefits received.

C. Costs must be authorized or not prohibited under Federal, State, or local laws or regulations. Costs incurred must not be prohibited by any Federal, State, or local laws.

D. Costs must receive consistent treatment by a grantee. A grantee or subgrantee must treat a cost uniformly across program elements and from year to year. Costs that are indirect for some programs cannot be considered direct ETA grant costs.

E. Costs must not be used to meet matching or cost-sharing requirements. A grantee may not use federally funded costs, whether direct or indirect, as match or to meet matching fund requirements unless specifically authorized by law.

F. Costs must be adequately documented. A grantee must document all costs in a manner consistent with GAAP. Examples include retaining evidence of competitive bidding for services or supplies, adequate time records for employees who charge time against the grant, invoices, receipts, purchase orders, etc.

G. Costs must conform to ETA grant exclusions and limitations. A grantee or sub-grantee may not charge a cost to the grant that is unallowable per the grant regulations or the cost limitations specified in the regulations.

CASH MANAGEMENT

Service providers will use the requisition for cash form to requisition cash under provider agreements. Cash requisitions may be made on a weekly basis, but no less than once per month, and must be received by the Bureau by 2:00 pm Friday to guarantee transfer of the funds by the following Thursday. If received later than 2:00 pm, the transfer may be delayed. The Bureau is not responsible for errors made at the State Treasury once the request for funds transfer is initiated, should the error cause the request to be delayed.

Cash requisitions may not exceed the amount authorized in the service provider’s Notice of Obligation. No cash payments will be made to a service provider of a grant until the Bureau receives the Federal Notice of Obligation from the awarding Federal agency.

A. Authorized Signature Sheet An individual authorized by the governing body of the service provider organization or agency completes the Authorized Signature Sheet to verify the signature(s) of individuals authorized to draw cash under the agreement with the State-funding agency. Authorized Signature Sheets are applicable to specific service provider agreements and must be submitted annually at the beginning of the contract period.

A facsimile of the Authorized Signature Sheet can be found in the Forms Section.

B. Method of Payment Payments to service providers shall be made on a cash requisition basis. The Bureau shall limit payments to actual and immediate cash needs. If a service provider does not comply with the requirement to keep cash requisitions limited to only actual and immediate needs or
if they do not follow the grant agreement, the Bureau may, after notice to the service provider, discontinue the cash requisition method and make payments by reimbursement only.

Cash requisitions can be made by FAX, US Postal mail, or email. An authorized representative identified on the Authorized Signature Sheet must sign for all cash requisitions. If the requisitions are emailed, an authorized signatory must email them. The drawdown of funds from one grant for the purpose of funding deficits in other grant programs is prohibited.

A sample Requisition for Cash form can be found in the Forms Section.

Service providers may modify any forms noted in this section as needed. The Bureau must approve all modifications to the form prior to implementation.

C. Documentation Required for Cash Request

The Bureau reserves the right to request further documentation for clarifying purposes prior to sending cash transfer. 1. Requisition for Cash Form 2. Supporting Documentation Summary Form

EXPENSE GUIDELINES

Service providers are authorized through their provider agreement to incur expenses benefiting the service provider’s program. Additional information to clarify service provider responsibility is listed in this section.

A. Accrued Leave

1. Policy

Service providers must have a policy regarding accrual and use of paid leave by employees. The policy should have a reasonable limitation on the amount of paid leave that can be accrued from year to year.

2. Reference

Paid leave is allowable provided such costs are absorbed by all organization activities in proportion to the relative amount of time or effort actually devoted to each activity. (Reference 2 CFR Part 200.431)

3. Guidelines

If an employee is paid from more than one funding source, the service provider may only charge the appropriate portion of the leave pay to the service provider agreement.

Service providers shall submit a copy of the indirect costs allocation plan to the Bureau’s Fiscal Officer.

B. Per Diem and Travel Expense Limitations

Travel costs are expenses for transportation, lodging, subsistence, and related items incurred by employees and others who are on travel status on official business of the organization. Travel expenses must be reasonable and necessary, and for a bona fide business purpose related to the funding source. All supporting documentation must be kept on file. Examples of supporting documentation include agendas and receipts.

Service providers are required to develop and maintain policies regarding compensation for staff and participant travel costs. Meals, lodging, rental cars, airfare, mileage for employee-owned cars, and other travel expenses may be paid for staff and participants who travel as part of their job, training activity or grant purpose. Documentation of the purpose and cost of travel must be maintained. The documentation should include the time of travel in order to compute and verify allowed per diem
amounts. No employee may be reimbursed for expenses incurred in going to and from work. Lunches and/or dinners in your home office city outside the scope of an agenda are prohibited.

The State-funding agency may reimburse members of boards and councils, consultants, volunteers, service providers, and others for travel expenses incurred for an allowable purpose benefiting the workforce investment system. All travel expenses for State-sponsored purposes are subject to State per diem.

C. Food Purchases Per ETA Financial Management Bulletin No. 01-10, meals, food and refreshments for employees are prohibited.

DEFINITIONS • External Customers would normally be considered as program participants and/or employers. Professional colleagues would normally be considered individuals outside of the organizations influence but sharing common interests and goals of the organization. • Internal Customers are employees, sub-grantees, and board members. • A trainer is neither an internal customer nor an external customer and cannot be used to determine if food is allowable.

ALLOWABLE COSTS • Meals that can be paid with ETA funds. Meals that can be a direct charge or charged through an indirect cost allocation plan. • Meals while employees are in travel status are allowable per agency travel policy. • Meal costs are allowable when the grantee incurs such costs in the process of conducting meetings or conferences with external customers and other professional colleagues outside of the entity’s organization. • The cost of a “working lunch” with external customers and other colleagues is only considered “reasonable and necessary” when there is adequate documentation on the necessity of having a meeting during a meal time instead of during normal business hours. Documentation should specify what ETA-related subjects were discussed and include a list of participants and dated itemized meal cost receipts.

DISALLOWED COSTS • Charging costs for meals and refreshments while engaging day-to-day business with employees is disallowed. • All meals and refreshments at meetings where the attendees are internal customers only are disallowed. This includes but not limited to coffee, bottled water, networking breakfast, lunch and dinner. • All above meal costs must be paid with non-ETA federal funds and cannot be paid through an indirect cost allocation plan. D. Procurement, Inventory and Disposal 1. Guidelines Service providers may procure equipment, supplies and services under the provider agreement. Items expensed to the provider agreement must be reasonable and serve the primary objective of the agreement. Supportive services are allowable as outlined in Section 4.100 of the WIOA Manual.

The purchase or construction of facilities or buildings is unallowable under the Workforce Innovation and Opportunity Act, except for certain circumstances. WIOA Regulations 20 CFR Part 683.235

Service providers are delegated authority to make purchases of equipment, supplies and services as described below. Service providers are responsible for ensuring the vendors selected are not debarred or suspended by checking the information on the following federal government website: http://epis.amet.gov.

a. Micro Purchases – under $3,000. All service providers may purchase items with a value of less than $3,000 using any open and fair procurement method that best meets the agency’s needs. The method should assist the service provider in obtaining a high quality product for a fair price. Documentation should be maintained of the need for the item and its benefit to the program. b. Limited Solicitation for Services - Purchases between $3,001 to $25,000. Service providers must
maintain a fair and open procurement process meeting the criteria for small purchases. This requires a documented solicitation from a minimum of three viable sources, if available, either orally or in writing. In addition, the service provider must obtain and document prior approval from the Bureau for the purchase, and maintain documentation of the following: bid and rating criteria; advertising and public notice of the bid opportunity; responses received; and reason for the decision. c. Limited Solicitation for Supplies – Purchases between $3,001 to $50,000. Service providers must maintain a fair and open procurement process meeting the criteria for small purchases. This requires a documented solicitation from a minimum of three viable sources, if available, either orally or in writing. In addition, the service provider must obtain and document prior approval from the Bureau for the purchase, and maintain documentation of the following: bid and rating criteria; advertising and public notice of the bid opportunity; responses received; and reason for the decision. d. Formal Competition - Large Purchases over $25,000 for services and $50,000 for supplies. Large purchases are typically included in the provider agreement as part of the major purpose of the provider agreement, although this is not a requirement. Large purchases are subject to all the requirements of medium purchases, and in addition must use a formal, closed-bid procurement process. Service providers must obtain and document prior approval from the Bureau. DLI Purchasing Procedures Manual Section VIII: Procurement Tools 2. Inventory Service providers must maintain an inventory record of assets purchased that have a unit acquisition cost of $5,000 or more. A physical inventory must be taken at least once every two years to verify the presence of items on the inventory list, and an annual reconciliation of books and inventory records must be completed. Closeout of a provider agreement will include reconciliation and a report on office equipment or any other items purchased under the agreement.

Service providers must maintain physical control of the asset to ensure adequate safeguards are in place to prevent loss, damage or theft of property. Adequate maintenance procedures must be in place to keep the property in good condition.

Service providers must retain property records for the time period required in the provider agreement. 3. Disposition Service providers may dispose of equipment and supplies according to agency policy when the fair market value of the equipment unit, or the aggregate fair market value of the supplies, is less than $5,000.

Service providers must notify the Bureau and obtain permission to dispose of items listed above that are valued above $5,000. The State has the following options: a. Request the equipment or supplies be returned. b. Approve a buy-out of the equipment or supplies by the service provider or another agency. c. Approve a sale of the equipment or supplies by the service provider. d. Approve State of Connecticut surplus property requirements if the service provider is a state agency.

PROGRAM INCOME

Program income is the gross income received by the service provider directly generated by a grant-supported activity, or earned only as a result of the grant agreement during the grant period.

A. Program Income Inclusions 1. Fee for Services: Income from fees charged for services. 2. User or Rental Fees: Income from the use or rental of personal property acquired with grant funds. 3. Sale of Products: Income from the sale of goods constructed under a grant agreement. 4. Revenue in Excess of Expenditures: If an organization earns or receives revenue in excess of its costs under a WIOA Title I program (Adult, Youth, Dislocated Workers, Job Corps, Native American, Farmworker and Veterans’ programs) that revenue is to be treated as program income. B. Program Income Exclusions 1. Applicable Credits Reductions to grant costs as a result of refunds, rebates, credits,
discounts, or the interest earned on them. 2. Sale of Property Proceeds from the sale of personal property. 3. Royalties, Copyrighted Material, Patents, and Inventions This income is considered program income only if specifically identified as such in the grant agreement or Federal agency regulations. However, the payment of royalties by WIOA and other federally funded grants is an unallowable cost. USDOL policy is that Federal funds may not be used to pay royalties for federally developed projects or works. 4. Income Earned after the Grant Period Has Ended The grantee is not accountable for income earned after the end of the award period. However, the grantee must report program income expended after the grant period if the income was earned during the grant period. 5. Donations Donations and contributions are voluntary and are not generated by the use of grant funds. 6. Profits of Commercial Organizations Profits earned by commercial for-profit organizations are not considered program income. Caution – care should be taken to minimize the amount of profit generated by grants. 7. Matching Funds Funds provided to satisfy the matching requirements of the grants are not considered program income. Conversely, program income generated through grants may not be used to satisfy any match requirements.

C. Accounting for Revenue and Cost of Generating Program Income 1. Net Income Method With the net income method, the costs incidental to the generation of program income are netted against or deducted from gross program income to determine the amount of net program income. The expenditures and revenues associated with performing the activity that generates program income are tracked separately in the accounting records. 2. Gross Income Method With the gross income method, all gross revenues derived from program income activities are accounted for as program income. In turn, the service provider’s share of the allocable costs associated with generating that revenue are charged to the appropriate program activities and/or cost categories.

D. Accounting for the Expenditure of Program Income 1. Separate Accounting When using separate accounting, program income is treated as additional funds committed to the grant agreement, for which separately identifiable services are performed, and the expenditure of program income is accounted for separately from the original agreement. For accounting purposes, the program income is treated as if it were a separate (sub)grant or cost objective. 2. Transfer of Expenditures When using transfer of expenditures accounting, expenditures are initially recorded in the accounts of the original agreement and are subsequently transferred to the program income account to offset the amount of program income earned. The result is that the program income is accounted for as fully expended, while expenditures charged under the agreement are reduced by the amount of expenditures that have now been applied to program income.

Regulations require that the net program income be added to the total funds available for the program. Thus, the transfer of expenditures is only applicable should the entity fully expend both the grant and the program income.

E. Uses Of Program Income The requirements for using program income are the same as those applied to the grant funds with the exception of the administrative cost limitation. These requirements include: 1. Allowable cost guidelines 2. Cost classification guidelines 3. Inclusion of program income earnings and expenditures in the audit 4. Rules on procurement and selection of service providers 5. Participant records and other record-keeping requirements 6. Sanctions for misuse

29 CFR Part 95.24(a) and WIOA regulations specify that program income is to be added to the total grant award and used to provide the same services as the original grant agreement. It is the policy of the Employment & Training Administration (ETA) and the Bureau that program income be wholly
expended with the period of availability for WIOA grants. Any program income funds remaining would be used to reduce the reported grant expenditures at closeout.

EXPENDITURE REPORTING

All federal grant expenditure reports shall be submitted to the Bureau on a quarterly basis. All quarterly reports are due to the Bureau by 5:00 p.m. on the twenty-fifth (25) calendar day of the first month after the quarter end date. Quarter end dates are March 31, June 30, September 30, and December 31.

U.S. DOL ETA Financial Report, ETA-9130 form will be used and may be modified to encompass all reporting requirements depending upon the federal grant being submitted. Various examples of the ETA-9130 are located in Forms section. Recipients of grants are required to report expenditures separately for each source of funds cumulatively from the inception of each grant. In order to properly report costs, all grant recipients must establish a reporting system that allow them to incorporate costs at all levels of the system into the Financial Reports (FRs) submitted to the Bureau.

A. Late Reporting Service providers shall receive one written warning notice concerning late reporting. At the Bureau’s discretion, each subsequent late report will result in the withholding of one (1) percent of the service provider’s administrative total accrued expenditures to date. If the service provider does not receive administrative funding, one (1) percent of total accrued expenditures to date will be withheld. Consistent late reporting may result in the termination of the grant.

B. Expenditure Limitations When expenditure limits are set on administrative or other cost categories, those limits will apply to actual expenditures and cannot be exceeded without prior written approval from the Bureau.

GUIDELINES FOR ONE STOP OPERATOR FISCAL REQUIREMENTS [RESERVED]

GRANT AGREEMENT CLOSEOUT

Each service provider is responsible for developing and maintaining a system to comply with the closeout requirements specified at 2 CFR Part 200.343 and 2 CFR Part 2900.15. To ensure that the Bureau closes out grants in a timely manner to ETA, the following guidelines are established for service providers:

Closeout reports are due to the Bureau by 5:00 pm on the fifteenth (15th) calendar day of the third month following the end date of the grant. For example, if the grant closes on June 30, the reports are due by 5:00 pm September 15. If the due date falls on a weekend, the reports are due the following Monday.

A. Closeout Process 1. The service provider must close and settle its contracts and reconcile all financial activity related to the grant prior to closing the grant with the Bureau.

2. All refunds due to the awarding agency must be made before the closeout OR submitted with the closeout documents.
3. Pending claims or late arriving invoices must be best estimated and identified in the closeout reports. Once the items are received, reconciliation must be done and sent to the Bureau to be attached to the reports. If a refund is due the awarding agency, it must be included with the reconciliation.

4. Any refunds, rebates, or credits received after the closeout must be sent to the Bureau. If stand-in costs were reported, they may be offset by such refunds, rebates, or credits; however, the stand-in costs must have been reported prior to the receipt of the refund.

5. The Bureau reserves the right for further grant adjustments based on audit findings after the closeout reports are submitted.

B. Closeout Package The closeout package consists of the following forms:

1. Service Provider’s Submittal of Closeout Documents Include a cover sheet that lists all the documents included in the closeout package. 2. Financial Status Report – Examples of this report are located in the forms section. 3. If necessary, a copy of the approved indirect cost rate. If indirect costs have been charged to the grant, a copy of the provisional or final rate may need to be included. If the grant is closed based on a provisional rate and the final rate is lower, the grantee is required to recalculate indirect costs and return all excess indirect costs within 45 days of the final rate approval letter.

4. Grantee’s Release The grantee certifies the release of the grantor agency from further monetary obligations under the grant. Certain specifically identified claims such as unclaimed wages, Worker’s Compensation claims, or other outstanding claims must be identified and the list attached to the grantee’s release. 5. Grantee’s Assignment of Refunds, Rebates, and Credits – The grantee waives claim to any refunds, rebates, or credits received after the grant has terminated and assures prompt remittance to the grantor agency. 6. Government Property Closeout Inventory Certification – This form provides for an inventory of all real or personal property purchases acquired with grant funds or received from the Federal government where the DOL reserves the right to take title, or a certification that no such property was acquired with grant funds.

AUDITS AND RECORD RETENTION

A. Audit Requirements The Service Provider is responsible for independent annual audits of its Provider Agreement and costs associated therewith. If a Service Provider qualifies under the Single Audit Act amendments of 1996, the Service Provider shall have an audit conducted in accordance with Office of Management and Budget (OMB) Uniform Guidance 2 CFR Part 200 Subpart F and the applicable audit standards set forth in the Standards for Audit of Governmental Organizations, Programs, Activities, and Functions issued by the Comptroller General of the United States. Any audit findings in connection with this Provider Agreement shall be resolved with the Grantor within 180 days of the publication of the final audit report. The Grantor may, in its sole discretion, also require additional audits. The Service Provider will pay these additional costs.

Responsibility for audit costs and for maintaining complete financial records remains with the service provider.

Service providers having a single audit conducted are to inform the auditing firm that audits are to be made in accordance with the: 1. Generally Accepted Governmental Auditing Standards (GAGAS) 2.
The audits will include, at a minimum, an examination of: 1. The systems of internal control; 2. Designation of major programs; 3. Designation of risk; 4. Compliance with laws, regulations, contracts/grants; 5. Financial statements and federal awards schedule; and 6. Prior year audit findings. The examinations are to determine whether: 1. There is effective control over and proper accounting for revenues, expenditures, assets and liabilities; 2. Financial statements are fairly presented in accordance with generally accepted accounting principles; and 3. Funds are being expended in accordance with the terms of provider agreements and those provisions of Federal law or regulations that could have a material effect on the financial statements or the awards tested.

Service providers must ensure that the audit work papers and reports are maintained for a minimum of five (5) years, and that the work papers are available to the Bureau.

Service providers will follow the purchasing procedures contained in Section 6.30 for acquiring the necessary audit services.

A copy of the final audit report is due to the Bureau within the earlier of 30 days after publication of the auditor’s report, or nine (9) months after the end of the audit period.

B. Audit Resolution Procedure

1. 180 Day Resolution Period Any audit findings in connection with this Provider Agreement shall be resolved with the Grantor within 180 days of the publication of the final audit report. The Grantor may, in its sole discretion, also require additional audits. The Service Provider will pay these additional costs.

   a. The service provider will have thirty (30) days from the publication of the final audit report to respond and provide any supporting documentation for costs questioned or recommended for disallowance. The Bureau will accept only written responses. All findings and recommendations are to be addressed by the service provider in their response.

   b. The Bureau will issue a written initial determination within thirty (30) days of receipt of the service provider’s first response.

   c. The service provider will then be given the opportunity for informal resolution by having thirty (30) days from receipt of the initial determination in which to respond with any further supporting documentation or information.

   d. The Bureau will issue a final determination within thirty (30) days of receipt of the service provider’s response to the initial determination or no later than 180 days after the audit report has become final. The final determination includes: (1) Those matters which were not informally resolved; (2) Corrective actions which will be necessary; and (3) Notice to the service provider of the opportunity to request a hearing. Within thirty (30) days of the receipt of the final determination, the service provider may submit in writing a request for hearing to the Statewide Workforce Programs and Oversight Bureau.

2. Grievance Procedure The next step is to go into the regular grievance procedure, where a service provider may choose to request a hearing.
3. Funds Returned The Bureau will require the return of all funds that were not expended in accordance with laws and regulations.

C. Debt Collection Policy Debts receivable must be paid within thirty (30) days of establishment of the debt. Repayment of debts established will be in the form of a cash payment unless negotiation between the Bureau and the debtor produce some other method. Cash from a non-federal source is the required method of repayment where there is misuse of funds due to willful disregard of requirements of the Act, gross negligence, or failure to observe accepted standards of administration. Settlements of debts on a non-cash basis will be by exception.

D. Methods of repayment by cash are as follows: 1. Lump Sum Payment in full may be made by certified check, money order, cashier’s check, or bank draft.

2. Installment Payments Cash installment repayment agreements are usually of short-term duration, from three (3) to 12 months, and are limited to 36 months by the Federal Claims Collection Standards. Duration is negotiated based on the size of the debt and the debtor entity’s ability to pay.

3. Adjustment in Payments When cash repayment in lump sum or in installments is impossible, an agreement may be entered into with the debtor whereby the contract is reduced by the amount of the debt repayment while the program is maintained at an undiminished cost level through nonfederal contributions.

4. Withholding This repayment method will involve withholding amounts owed the debtor for past services or for other considerations already provided in satisfaction of the debt owed.

E. Examples of Non-Cash Repayment Methods These methods must be negotiated with the Bureau prior to being considered as a method for debt recovery.

1. Stand-in Costs This method is not actually a debt repayment, but is a way of “erasing” the debt. The debtor must identify allowable non-federal costs associated with the contract but not charged to the contract, and substitute those costs for the disallowed costs, thus erasing the debt. These expenditures must have been reported to the Bureau with the quarterly financial status report or closeout package for the year the costs were incurred in order to be considered for disallowed costs incurred during that same time period. This method would require negotiation and agreement with the debtor that such costs are subject to audit. Documentation that will establish a clear audit trail must be maintained when such agreements are made.

2. Service in Lieu of Cash This method involves a repayment agreement with the debtor whereby additional services above those originally agreed to with the recipient, paid through nonfederal funds, are received in lieu of cash. When it becomes clear that a debtor cannot repay through any other repayment method, an agreement of this nature may be negotiated. This method requires a written agreement signed by both parties with conditions regarding the type of funds to be used, documentation subjected to audit, and a description of the services rendered.

3. Offset This method involves reducing the contract up to the amount of the debt. The Bureau, on behalf of the Governor, may use this option with the approval of the Secretary of Labor.

If an established debt is not paid within thirty (30) days of the final determination or if established installment payments are more than thirty (30) days late, a letter will be sent stating that payment is due immediately. At forty-five (45) days, another letter will be sent stating the account will be sent to
the Attorney General’s Office if not paid within fifteen (15) days. At sixty (60) days, the account is
turned over to the Attorney General and the Bureau will consider whether to continue to do business
with the debtor.

F. Record Retention This policy provides guidance for proper maintenance of financial and
programmatic records. These records must be accessible to authorized Federal and Bureau
oversight staff and verifiable for monitoring, reporting, audit, and evaluation.

Length of Record Retention For both grantees and service providers, records must be retained for
five (5) years following the date on which the expenditure report containing the final expenditures
charged to a program year’s allotment or a grant is submitted to the Bureau.

The record retention period does not start over if final expenditure reports are revised, if these
revisions are for the following reasons: 1. Revisions resulting from closeout Such revisions are
considered expenditure adjustments and do not alter the initial time period for record retention. The
records must be retained for five (5) years from the original submission date of the final expenditure
report. 2. Revisions resulting from litigation, audit/audit resolution, or claims Records must be
maintained for five (5) years following the submission of the final expenditure report or until all issues
resulting from litigation, audit/audit resolution, or claims have been resolved and final action taken,
whichever is longer.

G. Other Retention Regulations 1. Real property and equipment records must be retained for five (5)
years after final disposition of the property. 2. WIOA Title IB Complaint Records Actions related to
resolving complaints shall be maintained for not less than five (5) years from the date of resolving
the complaint. In addition, WIOA Title IB grantees and service providers must follow the
requirements of 29 CFR Part 37, as these regulations apply to the entire organization receiving
WIOA funds. These records should be maintained as a whole record system.

3. Litigation/Audit Records These records must be retained beyond the prescribed period if any
litigation or audit has begun, or if a claim is instituted involving the grant or agreement covered by
the records. The records must be retained until resolution of the litigation, audit, or claim and final
action is taken; or until the end of the regular five-year record retention period, whichever is later.

4. Failure to Obtain An Audit A failure to obtain and audit extends the record retention requirement
indefinitely. A delay in obtaining an audit or in resolving audit findings extends the record retention
period until all audit requirements have been satisfied and all findings have been resolved to the
satisfaction of the awarding agency.

5. Indirect Cost Records Computations or proposals, cost allocation plans, and supporting
documentation and records must be retained for five (5) years from the date the indirect cost rate
package is submitted for negotiation. If not submitted for negotiation, the records must be
maintained for five (5) years from the end of the Program Year that contains the final grant costs.

H. Termination of Relationship When the relation with a service provider is terminated, the service
provider’s responsibility for maintenance and retention of records does not end. However, the
Bureau may want to take physical custody of the records to assure that they are available if needed
in instances where the sub-grantee is unable to physically retain them.

I. Record Storage Records shall be retained and stored in a manner that will preserve their integrity
and admissibility as evidence in any audit/litigation or other proceeding. Microfilmed or photocopied
records can be substituted for original records because they are generally accepted as admissible for evidentiary purposes. The burden of production and authentication of the records shall be on the custodian of the records. Failure to authenticate the records will deny the custodian the right to use it.

J. Applicable Regulations OMB Uniform Guidance 2 CFR Part 200.333

This includes financial and program records, supporting documents, statistical records, and other records that are either required to be held by regulation or grant agreement or could reasonably be considered as pertinent to regulation or the grant agreement.

LOST OR STOLEN/FORGED CHECKS

If a check has been lost or destroyed, the payee must fill out a statement stating the circumstances of the loss or destruction of the check and requesting that payment of the check be stopped. If the check has been mutilated or defaced, it should be forwarded to the issuing agency with the request for re-issuance.

If the payee recovers an original check after he/she has furnished a statement of non-receipt, he/she should notify the issuing agency immediately. In the event the replacement check has been received prior to the recovery of the original check, the original check should be returned immediately to the agency. Under no circumstances should the payee attempt to cash both the original and replacement check.

In the event of a stolen and/or forged check, the payee must file a police report with the local law enforcement and forward a copy of the report along with a statement stating the circumstances of the situation and whether it was endorsed, and also requesting that payment of the check be stopped.

MANAGEMENT INFORMATION SYSTEM REQUIREMENTS

The WIOA portion of CThires VOS system collects and disseminates information on participants and program results. The system was designed using the Workforce Investment Act Standard Record Data (WIASRD), used to provide guidance in completing registration and outcome information.

Information about an individual and their WIOA Title 1B experiences is used to: 1. share program results with consumers, taxpayers, Congress, and other program overseers; 2. compare results among WIOA service providers, other states, and with other federally funded programs; 3. and evaluate and continuously improve services.

This information is required by legislation. It is confidential and protected by all applicable privacy rules.

For the staff member at a one-stop or workforce center, Virtual OneStop incorporates case management, customer tracking, and follow-up services. A case manager or counselor can help individuals with basic (i.e., core) services, and track the information. They can also track and share information regarding eligible individuals receiving intensive and training services. Staff can also support employers with basic services related to job orders and employer accounts.
Intensive Individual Services Program Application and Eligibility Determination – Virtual OneStop uses a common database. Staff members can enter data once for individuals using various services from different programs or agencies, or they can enter required data for a specific program application. Either way, the data is shared by programs from different agencies within the one-stop partnership, and accessed where it is needed. This streamlines the process of matching customers with services they need pertaining to employment. • Case Management and Tracking – Staff can enter, assign, review, and monitor case information for specific individuals registered within the workforce center. Authorized staff can automatically assign customers to specific case managers, or to multiple members of the one-stop staff. The case manager or counselor can view personal folder information, employment and training research, reports, and program activities. Applications, enrollment forms, status changes, program outcomes, and follow-up forms can be entered, viewed, and modified. Case histories can also be viewed. For more information about case management, see chapter 3 - Manage Individuals – Create, Assist, and Manage Profiles, and chapter 4 - Individuals – Case Management. • Case Notes – Counselors and case managers can enter their own case notes for activities and observations about their customers. Security privileges control who sees case notes, as well as other case management and tracking features, so that data is viewed on a need-to-know basis. For information about working with case notes, see the topic “Case Notes Tab” in chapter 4 - Individuals – Case Management.

• Assessment – Assessment Process Summary Information can be recorded for multiple test results, allowing progress to be tracked for a customer with multiple intensive assessments. For more information about assessments, see the topic “Managing a Self-Assessment Profile” in chapter 3 - Manage Individuals – Create, Assist, and Manage Profiles. • Skills and Interests Analysis – Staff can help individuals define their skill sets, work interests and work importance, and match the skills to standard O*NET occupation definitions (which helps to match individual skills to existing jobs). For more information on skills and interests, see the topic “Managing a Self-Assessment Profile” in chapter 3 - Manage Individuals – Create, Assist, and Manage Profiles. • Appointments and Messaging – Staff can send and view messages from all the cases in their caseload. This includes appointment and event notifications. For more information about working with appointments and messages, see the topic “Messages” in chapter 2 - My Workspace. WIOA Program Overview

Individuals who enroll in the Workforce Innovation & Opportunity Act (WIOA) program will undergo a process similar to the one outlined in the Wagner-Peyser topic – this includes creation of a WIOA Application, a Participation record, and then enrollment in activities and services that have WIOA associated activity codes. Virtual OneStop wizards help staff progress step-by-step through tabs to enter WIOA data, starting with tabs for a WIOA application, based on the individual’s date of birth, and selection of eligibility type and date in the first step of the application (e.g., Adult, Dislocated, and Youth). The WIOA program focuses on workers whose eligibility determination is similar to the previous WIA requirements, but the WIOA eligibility has been streamlined for the new, approved WIOA legislation. Individuals who enroll in WIOA must undergo a process of creating an application, a participation record, and enrolling in activities. Staff will identify the eligibility. When starting a first time WIOA applicant, only the “Create” link is displayed. As Application and enrollments are made, staff can expand links to see all of the details. type, for which they are helping the individual to apply. The system will determine eligibility at the end of the application process.

The applications, participations, and enrollments, as well as any additional entered employment, closures, outcomes, or follow up activities, are all available to staff members assisting individuals. (Some access may depend on staff’s specific Admin privileges.) Staff can expand the WIOA Program line to start the WIOA Application (for a new applicant), and determine their eligibility for WIOA enrollment. For active participants, staff can expand additional lines to access all enrollments,
activities, and other details. An overview of each form and related stages of WIOA program participation is indicated in the table below, followed by topics and steps for each related form.

Note: The forms are listed in a suggested sequence. Your internal policies or customer business rules may require using the forms in a different sequence than listed below.

Step Form Name Reason for Use

1 WIOA Program Application Form The top of the WIOA application form initially displays segments of a progress bar (versus showing tabs) to help you see your progress as you step through the application, gather basic data, and determine customer eligibility for the WIOA program. Each segment (or tab) is a separate page for the application that helps determine customer eligibility for participation in WIOA. Once the application form is complete: • Staff can start participation for the individual. • The Wizard, Validation, and Print icons ( ) will display on the Programs tab for easily maintaining the application. Staff enter data in each tab/segment (e.g., general, contact, demographics, veteran, employment, education, and barriers data). They begin data entry at the Start tab/segment. In WIOA, this includes selecting the Eligibility types (and dates) for to use for the rest of the application, and the individual's eligibility determination.

2 WIOA Participation The participation form is used to gather final details of participant status (e.g., verifying employment and UI claim status at participation) before staff enroll a participant in activities or services for WIOA. The completion of this form will begin the screen for enrolling in the first service.

3 WIOA Activity Records (Activity / Enrollment Form) This is a series of tabs used to supply details of each activity in the WIOA participant’s service record. The enrollment form is opened for a single service/activity, and displays tabs to enter/maintain enrollment data (including areas for general, service provider, cost, financial aid, budget, and closure data). Each entered service is displayed in a table on below the WIOA Activity link. The table includes completion status, begin and end dates, and links to view/modify existing activities. Service/activity records can be entered or maintained for the WIOA application (e.g., assessments of abilities, approved training activities, support services).

4 Case Closure Form Allows staff to record federal and local performance measures before the program exit occurs.

5 Exit (Outcome) Form Officially terminates participant involvement in a federal program and provides details of the participant's status after program participation (for Common Measures reporting).

6 Follow-up Form Provides additional details of the participant’s status after program exit (for Common Measures reporting).

The WIOA Application Staff begins the WIOA Application for an individual, just as they begin an application for any other program. They expand the WIOA Program link, click a Create Application link, and work through each of the program tabs, as major steps of the application. The first screen displayed is the Start tab, which displays as a segment of the WIOA application progress bar. In WIOA, this Start tab/segment includes identifying the program application date, as well as selecting the application type/group and the date for which the staff member is determining the eligibility for that type. There are four eligibility type selections on the Start tab: • Adult Basic Career Services • Adult • Dislocated Worker • Youth In WIOA, the core and intensive activities are essentially combined into a ‘career services’ category in which workforce staff will have the flexibility to better meet the unique needs of individual job seekers. The sequencing of services is eliminated, as well as the determination of core or intensive before picking and eligibility type and starting moving past the first tab. The only rules controlling which of the four eligibility types staff can select are the age of the individual (when setting the date for the eligibility type), and any admin privileges set for the staff member. Below is a brief summary of the four eligibility types and the rules that are incorporated into the tabs/segment which staff will progress through, before eligibility determination is completed and shown (which is shown at the top of the last tab). Following this brief table are topics and descriptions for the separate WIOA application tabs for each eligibility type, followed by topics for creating participation, activity enrollments, and other topics for managing the WIOA application through to its closure.
You can click on an Eligibility Type name (in tables below) to skip to a section for that type. Quick Tip But, the subtopics for Adult contain complete descriptions for all application tabs. Descriptions in other topics focus on only the differences for those eligibility types; they will reference the Dislocated Worker section for details when they are the same in each type.

Enrollment tabs, and forms are discussed after each application type, starting on page 6-65

Summary of Eligibility Types and Requirements

Eligibility Type Brief Description of Eligibility Requirements Adult Basic Career Services (ABC) In WIOA, the old core and intensive activities are combined into overall career services. The sequencing of services is eliminated – staff can select services for adults in a manner that best meets the unique needs of the job seeker (there is no a requirement to provide basic career services before individualized services).

It is not recommended that staff use the ABC enrollment type, which limits the enrollment data gathered and the services available. However, ABC exists for certain states/sites where they use an Integrated Services Co-enrollment business model. In this model, staff enroll individuals in one or more WIOA services (using this shortened ABC application) and then also enroll them in Wagner-Peyser services. Adult 18 or older To be eligible to receive WIOA services as an adult (in the adult and dislocated worker programs), an individual must: • Be 18 years of age or older; • Be a citizen or noncitizen authorized to work in the United States; and • Meet Military Selective Service registration requirements (males only). As mentioned earlier, in WIOA the sequencing of services is eliminated. Both the WIOA career services and Intensive services are available to all adults and dislocated workers. Staff have the flexibility in determine services to better meet the unique needs of the individual job seeker, including all types of career services (career services, individualized career services, and follow-up services). However, individualized career services and training services must be given on a priority-of-service basis, regardless of funding levels, to: • Veterans • Individuals who are basic skills deficient • Public assistance recipients • Low-income adults • Other special priorities (e.g., other criteria defined by workforce boards) As staff progresses through the tabs, data is collected to determine eligibility as well as to identify priority levels, including factors such as family and family income. On the last tab, staff can consider other priorities. Workforce boards can establish criteria for other priorities, including resources and funds for providing career and training-related services in the workforce area, as well as the needs of specific groups in the workforce area and other factors the Board determines appropriate. Dislocated Worker 18 or older To be eligible to receive WIOA services as a dislocated worker (in the adult and dislocated worker programs), an individual must: • Be 18 years of age or older; • Be a citizen or noncitizen authorized to work in the United States • Meet Military Selective Service registration requirements (males only); and • Meet the definition of dislocated worker The requirements are identical to those for Adults, with the addition of meeting one of the criteria for dislocated worker, which are: • Has been terminated or laid off, or has received a notice of termination or layoff, from employment; • Is eligible for or has exhausted entitlement to unemployment compensation, or has been employed for a duration sufficient to demonstrate attachment to the workforce, but is not eligible for unemployment compensation due to insufficient earnings or having performed services for an employer that were not covered under a state’s UI law; and • Is unlikely to return to a previous industry or occupation (permanent layoff with no recall date). On the Employment tab, staff will see an additional Dislocated Workers section, including questions for six categories (that may can qualify the individual as dislocated) along with other Layoff and Dislocation Event fields.
Youth 14 to 24 In School Youth (14-21) Out of School Youth (16 to 24) To be eligible to receive WIOA services as a youth, an individual must:

- Be a citizen or noncitizen authorized to work in the United States
- Meet Military Selective Service registration requirements (if male and 18); and
- Meet the ISY or OSY youth definition

An Eligible Youth in WIOA means an in In-School Youth (ISY) or an Out of School Youth (OSY). Staff can check the Youth Eligibility box for any individual under 24. However, the tabs which staff must complete for eligibility will include data used to make an In School Youth (ISY) or an In School Youth (OSY) eligibility determination. In School Youth An In-School Youth (OSY) must be aged 14-21, attending school (as defined by State law), low income, and meet one or more additional conditions, which could include:

- Basic skills deficient
- An English language learner
- An offender
- A homeless child or youth, a runaway, in foster care, or has aged out of the foster care system, a child eligible for assistance under §477 of the Social Security Act
- Pregnant or parenting;
- Disabled; or
- Requires additional assistance to enter or complete an educational program or to secure or hold employment

Note: The emphasis in WIOA is on employment for OSY. Per the U.S. DOLETA, WIOA Youth Program Fact Sheet, “WIOA requires a minimum of 75 percent of State and Local youth funding to be used for Out-of-School Youth.” No more than 5 percent of ISY served in the workforce area may be deemed eligible because of the “additional assistance” criteria described in the last bullet, above.

On the Education tab, in Youth applications, staff will see specific questions if the attending school along with additional questions that will identify if they are ISY or OSY.

Out of School Youth Out-of-school youth must be aged 16-24, not attending any school (as defined under State law), and meet one or more additional conditions, such as:

- School dropout
- Within age of compulsory attendance but has not attended for at least the most Recent complete school year calendar quarter
- Holds a secondary school diploma or recognized equivalent and is low-income and is basic skills deficient or an English language learner; subject to the juvenile or adult justice system
- A homeless child or youth, a runaway, in foster care, or has aged out of the foster care system, a child eligible for assistance under §477 of the Social Security Act
- Pregnant or parenting
- An individual with a disability
- Low income person who requires additional assistance to enter or complete an educational program or to secure and hold employment

As mentioned previously, the emphasis in WIOA funding for youth is on employment of Out of School Youth (OSY). WIOA requires that 75 percent of youth funds to go to OSY. On the Education tab, staff will see specific questions that will identify if the individual is ISY or OSY. Depending on the answers on the Education tab, and on other tabs, the eligibility matrix which displays on the last tab may include Exception/Limitation indicators. Depending on staff privileges, then may be able to select to service the individual under the 5% exception.

Summary of WIOA Tabs per Eligibility Type

The same number of tabs will display for a WIOA application, for each of the three main eligibility types (Adult, Dislocated and Youth), as indicated in the table below. However, the eligibility type will determine differences for data on some of the tabs. The table is quick list of the tabs, and how they differ for each eligibility type.

Note: Adult ABC is an exception. It skips tabs that gather information WIOA requires for individualized adult services (e.g., assistance, income, miscellaneous tabs), and has one Barrier question.

Tab Adult (ABC) Adult Dislocated Worker (DW) Youth
The WIOA Case Closure The manual Program Outcome (Exit) has traditionally been used to collect relevant outcome data indicators for federal and local performance measures. However, with Common Measures, “hard” exits are used minimally and “soft” exits occur when 90 days have passed with no services provided. Since some measures can be collected before the exit is recorded and after all activities have an actual end date, the WIOA Case Closure will allow staff to record those federal and local performance measures before the program exit is recorded (either hard or soft exit). A WIOA case closure will ensure the following:

• Enable customer satisfaction data to be collected since it is presumed that the individual has completed their participation in WIOA but the exit has not occurred since 90 days have not passed from the actual end date of the last service. • Allow staff to record employment information prior to exit creation. • Allow staff to collect credential attainment, diploma attainment and placements built around federal reporting requirements.

Note: Your configuration settings will define the number of days following the case closure date that is acceptable for staff to record credential and diploma dates attained (define the number of days following the case closure date, or the number of days staff will wait for the soft exit to occur so that data may be collected in follow-up records – remembering that WP services will keep a soft exit from occurring).

Once a WIOA case closure has been created, a new program activity cannot be created for this application. However, WIOA follow-up services may be recorded. (For details, see “WIOA Follow-up Services” on page 6-95.) The WIOA case closure must be deleted before a new program activity (non-follow-up activity) may be created, and follow-up service codes will no longer be available. The WIOA case closure interface will become available when each valid activity has an actual end date. If there are activities with no actual start date, the WIOA case closure CANNOT be created. Since credential and diploma information can also be recorded in enrollment records, the WIOA case closure interface will not be available for data entry when there is an open activity (defined as a valid activity with an actual start date but no actual end date). It will not be available for an open, projected activity (defined as having a projected start date, a projected end date, no actual start date, and no actual end date). A voided activity will have an actual end date, but no actual start date. A voided activity will not prevent a case closure from being created.

To create a case closure (exit):

• Click Create Closure from the Programs tab. The WIOA Closure form displays (unless activities or goals are still open).

Note: If activities remain open, pop-up alerts display the need to first close activities. If open Youth Goals exist, an alert up will also
Create Closure Prompts for Review and Entry of Additional Data indicate that all Youth Goals must be closed. Click OK to clear alert, and manually close each open activity. (For details, refer to the “Enrollment Closure” topic on page 6-88.)

- In the General Information area, record or confirm your one-stop office location. • In the Credentials area, record credential attainment information. (If none was previously identified when closing the WIOA enrollment activity.)

Note: If credential information was recorded when staff closed the activity, the system will display details in the Credentials received in enrollment are of this form.

The link expands an area to add Employer and Job data, identical to the expanded area indicated in the topic for WIOA Follow-up.

WIOA Case Closure Form

- In the Employment Information area, click the Add Employer link to open/expand an Add/Edit Employer area (if you need to add new employer). • Record all required information in the displayed Employer Information area. • Record all required information in the displayed Job Information area.

? Click the Save button. The new employment is displayed in the Employer table.

Note: This is identical to employment entry in WIOA Follow-Up on page 6-100, and in the topic, “Create Entered Employment” topic on page 6-86.

- In the Staff Information area, use controls to add case notes or assign a case manager, if applicable. • Click the Add a Case Note link to add a case note, if applicable. • Use the Case Manager link to identify the appropriate staff person with this case closure. (Click Assign Staff, Assign Group, or Assign Me to conduct case assignment.) • Click Save to save your edits and completed the closure. Upon successfully completing the WIOA Case Closure form, the system displays the Closure as a link in the updated Programs tab screen (as shown below). Updated Programs Tab Showing WIOA Case Closure

Completing the WIOA Case Closure form also enables staff to record WIOA follow up services (‘F’ codes), as described in the next topic.

Note: You can reopen the Closure form by clicking the link, and use the Delete button to cancel and delete the closure. The Delete button is available only after you save the form and the Staff Information tab. By deleting the closure, the individual may continue to receive WIOA services. The Delete button is disabled when an Outcome/Exit record exists.

WIOA Follow-up Services As a result of successfully completing the individual’s WIOA Case Closure, the system will allow staff to record WIOA follow-up services. The process by which staff members record these service activities is the same as documented previously in these two topics: • “WIOA Core Service Enrollment” on page 6-65. • “Enrolling in WIOA intensive/Training Services” on page 6-77. The difference is that the only available type of services (i.e., the only activity codes) is Follow services (“F” codes).
Follow-Up Services and Soft Exits If a WIOA customer requires follow-up services, staff must first complete the WIOA Case Closure form. By doing so, they stop planned service delivery, and may only record WIOA follow up services (those that begin with the letter “F”). Follow-up services are not reported federally, and will not prevent the individual from completing program soft exit.

Note: If the customer must resume planned service delivery before soft exit occurs, authorized staff can delete the WIOA Case Closure. Check to ensure whether your program policy supports this behavior.

Although WIOA follow-up services might have a limited duration (most cannot exceed 90 days), fund tracking capabilities exist for fundable follow-up services (for example, support service delivery). Staff documents fundable follow-up services using the Enrollment form the same way they document fundable training services. Because WIOA customers can receive follow-up services for up to one year, it is not uncommon for program exit to occur before the completion of WIOA follow-up services.

WIOA Follow Up Activity Code Selection List

Virtual OneStop’s system configuration settings control the soft exit process for client records, and may occur as a single or combined event. The single soft exit process applies to one program at a time, regardless of the number of federal programs the system supports, by automatically closing the client’s enrollment record when the customer has not received a planned service in that program for at least 90 consecutive days. The combined soft exit process occurs when an individual fails to receive planned services for at least 90 consecutive days for all federal programs maintained within Virtual OneStop. In each instance (whether the system executed the single or combined soft exit procedure), Virtual OneStop will display as the client’s exit date the most recent end date for all relevant program services within the current enrollment period. This date might be the service’s actual end date (if recorded), or the service’s projected end date (if the actual end date is not recorded). The system’s ability to perform the soft exit process can be hampered, however, when the client receives a program service (either staff- or self-assisted) that re-calculates the 90-day countdown. For example, if the WIOA customer conducts a job search using Virtual OneStop when WIOA planned service delivery has ended, and if the customer has an active, open Wagner-Peyser (WP) enrollment record, the system will restart the 90-day countdown required to conduct program soft exit. This situation can account for a prolonged WIOA enrollment for the customer (who will remain open and active in WIOA and WP, minimally), simply because they received a Wagner-Peyser program service that extends the soft exit event. Staff should check with their supervisors/managers to know which WP program services will postpone the soft exit procedure in Virtual OneStop.

The WIOA Outcome (Hard Exit) According to provisions established by the federal government, staff need only create a WIOA outcome (or hard exit) if the individual satisfies one of the established global exclusions. Those global exclusions are: death, institutionalization, reservist called to active duty, medical need, family care needs, or, for youth, sent to a group home facility. Note: Completing a program exit and citing one of these global exclusions as the reason will NOT count such participants in Common Measures for performance tracking purposes.

If an individual does NOT satisfy one of these global exclusions, and if custom exit reasons are not configured for your system, federal policy requires the individual undergoes a planned soft exit from the WIOA program. That is, if the individual has not received a WIOA program service for at least 90 consecutive days, the system will automatically create a soft exit form.
Note: Your business rules may extend the minimum non-service period required for soft exit beyond 90 consecutive days.

When staff completes the WIOA Outcome form, the individual’s participation in the WIOA program has terminated, and planned services will no longer be delivered. As a result, Virtual OneStop will not display the quarterly follow-up schedule for WIOA, because participants who exit the program due to a global exclusion will not be reported federally.

To manually terminate participation in 1 WIOA program (create a hard exit):

• Click the Create Outcome link on the Programs tab (shown above). The system will check to ensure that all WIOA activities have been closed properly. If any remain open, the system will display an alert. To continue, staff must manually close out open WIOA activity services. For assistance, refer to the “Enrollment Closure” topic on page 6-88.

Note: If the youth goals were included, a message will also indicate that those must be closed.

Otherwise, the system will display the Outcome form. This form will help you gather WIOA Exit/Outcome information (as shown in the following sample figure). • Use the General Information area, to make selections from the drop-downs. ? LWIA (region) ? One-stop office ? Staff position (Staff, DVOP, LVER)

Using the Delete button depends on staff permissions

WIOA Outcome Form with General, Exit, and Staff Sections

Use the Exit Information section to record details of the individual’s program termination. • Enter the individual’s date of exit. • Select an exit reason. • Click the Click Here link to update the individual’s list of alternate contact people. • In Comments, type a brief description to further explain the exit reason. Note: The comment you type will automatically become a system-generated case note. Use the Staff Information section to perform staff-related functions. • Click the Click Here link to add a case note. • Click Assign Staff, Assign Group, or Assign Me to perform case assignment. • Click Save to secure your edits, or Cancel to escape.

WIOA Follow-Up The primary purpose for the WIOA Follow-Up form is to assist staff in predicting federal performance and to collect data that may be used as supplemental sources for federal reporting. The system will not provide access to this tool until the individual has been officially exited from the WIOA program, either through the hard or soft exit process.

Note: A follow-up is NOT required for any individual who exited from the program due to one of the global exclusions.

Using the Programs tab screen – as shown in the following figure – you may create two types of WIOA follow-ups for the individual: • Local (optional) follow-up by clicking Create a Follow-Up • Federal (required) follow-up by clicking the appropriate Follow-Up Type link Case managers can record follow-ups only in the current quarter for federal reporting requirements. The system does not allow federal follow-ups to be recorded outside the designated quarterly time periods. If you click a follow-up link prematurely, the system will display an alert (similar to the one shown at right). The positive goal measurement is to have the individual employed by the 2nd quarter after exit and still employed at the 3rd quarter follow-up. Another positive measurement is attainment of educational...
credentials, which can be recorded up to three quarters after exit. Each state sets its own threshold for the number of failed contact attempts that are required before attempts are discontinued. As you work through the Follow-up form: • Complete entries in each section. • Scroll and proceed to the next section. • When you have completed all sections, click Save at the bottom of the screen.

General, Alternate Contact, Exit & Closure

General Information should be complete and prefilled. You might want to update the individual’s alternate contact list. Alternate Contact Information is the same Contact control used elsewhere. It lets staff add an alternate contact, if one needs to be identified as part of performing the follow up. Exit and Closure Information is system-set based on data recorded in the WIOA Case Closure and/or WIOA Outcome (exit). If staff failed to record employment information when they completed a case closure, the system displays “No Exit Employment Information.” Otherwise the system displays employer details as recorded. This indicates the WIOA follow-up type (local vs. required).

If staff clicks the Create Follow Up link (instead of the link for a quarter) a Local Follow-up is created, and indicated here.

System-set data based on WIOA Case Closure and/or WIOA Outcome

Contact Attempts, and Follow-up Employment Information Areas

Adding Contact Attempts or adding Follow-up Employment Information requires clicking on a link to expand the area for the data entry fields. When data is entered, and saved, it appears in a table (within that area of the screen). Create New Contact Attempts

• Click the Attempt Contact link to open/expand a Create New Contact Attempt area. • Record any contact attempts (failed or successful). • Click the Add New Contact Attempt button. The new contact attempt is displayed in the Attempts table.

Note: Your site’s business rules determine how many failed attempts must be recorded before the system automatically assigns “Cannot locate” as the Other Status at Follow Up.

This link will opens a Create New Contact Attempt area to enter the attempted or successful contact.

This link will opens an Add/Edit Employer area to enter the employer and job information for the updated employment.

Create Follow-up Employment Information

• Answer if individual worked in this quarter. • Check Yes box if individual worked for employer from previous quarter. • If Yes, verify employer name. • Click the Add Employer link to open/expand an Add/Edit Employer area (if you need to add new employer). • Record all required information in the displayed Employer Information area. • Record all required information in the displayed Job Information area. • Click the Save button. The new employment is displayed in the Employer table. • Continue to the next section for Credential Information.

Note: If this is follow for a Youth application, you may first see areas for Youth Placement, Diploma/Certificate, and Youth Follow-up Services.
Credential Information area:

• Use the Credential Information section to record credential attainment information. ? Select the credential type from the drop-down (or enter the type if it is another type of credential). ? Enter/select the date. ? Click Verify to confirm the information. • Use the Update Education/Certificate History link if you need to update the history for the credential.

Current Status at Follow-up

• If previous data entry options are not performance indicators (e.g., closing the program because of transfer to other funding), use the drop-down or description field here to identify the type of status.

Note: A required WIOA follow-up schedule does not appear if the individual exited from WIOA due to a global exclusion. However, they can still select the link to Create a Follow-up, and the selection matching the exclusion could be selected here.

Contact Information area:

• Select the actual follow-up date. • Select the contact type. • Enter and comments of case notes.

Staff Information area:

• Select or confirm your one-stop office location. • Click the Click Here link to add a case note. • Click Save to secure your edits and complete the follow-up.

WIOA Youth – First Assessments, Literacy, Youth Goals

As mentioned earlier, upon successfully completing the WIOA Application for a Youth, the system may only allow the selection of Next>> (not Finish) at the bottom of the last application tab (see page 6-61). The Youth enrollment (as shown for the In School Youth below) may be limited to an appropriate assessment as the first service.

WIOA Youth Service Activity Enrollment Form

After completion of that assessment, and any required identification of Literacy and Numeracy levels, additional activities and services may be possible. The initial enrollment in an activity for youth services, and enrollment in additional services for youth, uses the same forms and tabs previously indicated. See the previous topic, The WIOA Service/Activity Enrollments (and the sample Initial Assessment activity), starting on page 6-65, for details on, and enrolling in an activity. Upon successful completion of the youth WIOA enrollment, the system re-displays the Programs tab screen with a WIOA Registration/Activity Record table that lists the enrollment activity. Possible differences for youth, after the first service, include the additional ability to create Younger Youth Goals, and record initial Literacy/Numeracy scores. Each is indicated in the following subtopics. Site configuration and Youth status may require a Lit-Num Pre Test record before further activities.

Younger Youth Goals Although not federally required (unless under special circumstances), state or local business rules, or site configuration may require staff to document at least one younger youth goal on the individual’s behalf before younger youth enroll in their second WIOA activity service.
To Create a Younger Youth Goal

• Click the Create Younger Youth Goals link on the Programs tab.

The system displays the Younger Youth Goal Record (shown at right). • Complete the required items on this screen. • Click Save to secure your edits.

Note: Normally, the first younger youth goal you create is a basic skills goal. You may choose other goal types for subsequent goals, such as goals related to occupational skills and work readiness skills.

The system updates the Program tab with the Younger Youth Goal displayed in a table below the Create Younger Youth Goals link.

Record Literacy & Numeracy Scores This interface is designed to meet WIOA Youth Literacy and Numeracy data collection and reporting requirements. Literacy and Numeracy gains are reported for all youth participants. Sites are required to document participant functional areas of deficiency, provide services to improve areas of deficiency, and to track progress toward improving functional area deficiencies through post testing for all youth who are determined Basic Skills Deficient and who are not enrolled in secondary education. This interface provides a data collection method to record pre-test data, and allows entry of multiple progress assessments for each participation year that allows staff to flag the progress assessment as the participation year’s posttest, for federal reporting purposes.

Note: The Create Literacy & Numeracy Records link is mainly used for WIOA youth, although WIOA adults and dislocated workers may also be included by request.

Create Literacy & Numeracy Records Screen

Note: Only one posttest may be used per participation year.

In addition, while federal requirements involve only youth, the system has been designed with a switch to allow sites to collect data for all customer program groups if desired.

Note: The interface will not limit pretest entries, but for federal reporting, only those pretests for youth that are within 60 days of the participation date will be reported.

Literacy & Numeracy Pre-Test Assessment To record a literacy and numeracy pretest assessment for the individual, click the Create Literacy & Numeracy Records link on the Programs tab: Refer to the following figure that displays a sample pretest assessment of the Literacy & Numeracy Record. This is another example of a data-driven form. As you complete required form items in order, from top to bottom, the page will “refresh” or “redraw” based on your data input, and display additional items related to your information. It is important to allow the system to fully refresh the page each time before attempting to record additional information. Click Save to save each section and proceed to the next section. When you save this Pretest assessment, the system displays the updated Programs tab:

To record progress assessments for this pretest entry, refer to the following topic.
Literacy & Numeracy Progress Assessment Once you create a pretest assessment to record the individual’s skill level, you can monitor any improvement made by recording progress assessments since the initial pretest.

• Click an existing assessment link within the Literacy & Numeracy Record table to access the screen for the Pretest Assessment to be updated (a sample of which is shown below). Data in the General Information section will already be largely prefilled. Select your office.

Updated Pre-Test Assessment Record

• Click the Create Progress Assessment Record link in the Progress/Assessments area of the screen. The system expands to display a Progress/Post Assessment area similar to one above. • In the expanded Progress/Post Assessments area, select Progress Test (or Post Test if applicable) as the type of test. • Then enter the updated Progress Test Functional Score. The system will complete the Educational Functioning Level. The system also completes the checkbox indicating if the participant remains deficient in basic skills, based on the score. • Enter the date of the assessment. • Then click Save to secure your edits. The system will display the updated Pre-Test Assessment screen, as shown in the following example:

Updated Pre-Test Assessment Record

To obtain details about a progress assessment, click the assessment Edit link. You can create multiple progress assessments on the individual’s behalf for each participation year. Use the Create Progress Assessment Record link again to create a new progress assessment record. You may also use this screen to record a posttest assessment for reporting purposes, with the same steps. For details, refer to the next topic.

Literacy & Numeracy Post-Test Assessment You will use the same steps for Post-Test Assessment, as indicated above for the Progress Test Assessment. In other words:

• Click the Create Progress Assessment Record link in the Progress/Assessments area of the screen. The system expands to display a Progress/Post Assessment area similar to one above. • In the expanded Progress/Post Assessments area, select Post Test as the type of test. • Then enter the updated Post Test Functional Score. The system will complete the Educational Functioning Level. The system also completes the checkbox indicating if the participant remains deficient in basic skills, based on the score. Progress/Post Assessments Area (for Post-Test) Record • Enter the date of the assessment, and any other need changes (e.g. Assessment Form/Version, or Position). • Then click Save to secure your edits. The system display the Post-Test Assessment (along with any other Pre-Test and Post-Test scores) in the updated Literacy Numeracy table on the Programs tab (as shown below). Excerpt of Updated Programs Tab Screen

Note: If you click on an assessment category, you will see the listing of both the Progress Test(s) and Poste Test(s) in the Progress /Post Assessments area – the area form which you can click edit, to make changes to this tests. The Test Type column indicates whether the test is a Progress of Post text in this area.

Progress Assessments Section, with Pre- and Post-Test Assessment Records
WIOA Outcome Form (Youth) The process by which WIOA youth leave the WIOA program is quite similar to that for WIOA adults and dislocated workers. For a process overview of the entire Outcome Form, see the topic, “WIOA Outcome Form (Hard Exit)” on page 6-97. In addition to open activities, the system ensures that any younger youth goals have also been closed before allowing program exit. If you click the Create Program Outcome link on the Programs tab, and at least one younger youth goal remains open, the system will display an alert similar to the following: To manually close out any open goals, perform the following steps: 1 Click the open goal link(s). 2 Enter the actual end date, which cannot be greater than the system date. 3 Select the desired Attainment of Goal code. Choices include: ? Attained ? Set, but not attained 4 Enter the close date for the goal. 5 Click Save to secure your edits.

Once you have closed all open WIOA activities (and goals for younger youth), you can manually exit the individual from the program. For details, refer to the “WIOA Outcome Form (Hard Exit)” topic on page 6-97.

Note: When a case is closed for youth, you should also close all goals, objective, and plans. This includes literacy and numeracy records (full pretest/progress test/posttest).

WIOA Follow-Up Form for Youth The process by which you complete WIOA follow-ups for youth is quite similar to that for WIOA adults and dislocated workers. The only addition for youth is that it contains three additional sections (between Follow-up Employment Information, and Credential Information sections). These three sections are the Youth Placement, Diploma/Certificate, and Youth Follow-up Services sections shown at right. For details on all the other sections of the follow up, refer to the topic “WIOA Follow-Up” section on page 6-100. This will include the sections in follow up for: • General • Alternate Contact • Exit & Closure • Contact Attempts • Follow-up Employment Information • Credential Information Staff Information

Creating Events for Workforce Development Boards (WDB) in CTHires

1. This desk aide is guided by CT Department of Labor WIOA Administration AP 15-04 which indicates:

   a. All participants attending staff assisted workshops including resume writing, interviewing skills, job search strategies and the like must be registered as WIOA participants.

   b. Participants attending self-service eligibility, orientation and the distribution of the top ten growth occupations in the state are not required to be registered WIOA participants.

2. Since the event calendar in CTHires was designed primarily as a Wagner Peyser tool, and in the interest of ease of organization and state wide consistency not all users will be granted access to create events in CTHires. This functionality will be limited to a select group of users in each WDB region who will coordinate with CTDOL Employment and Services staff who have been identified as event schedulers for Wagner Peyser workshops. Together this workshop team will create and coordinate monthly workshop calendars for each region.

3. The creation of a monthly workshop calendar begins with the Event Calendar fly-out menu located on the left hand side of the desktop.
4. Once selected all staff has the ability view the calendar which defaults to the current month based on the staff users LWIA assigned region. Additional filters can be applied to view specific information based on staff selection.

5. Workshops marked as Hidden can only be seen by staff and would need to be released by an authorized user to allow the public to see them on their own individual calendars.

6. Scrolling to the bottom of the workshop calendar view allows the user to select the Add Event option. Only staff with authorized rights can make this selection.

7. Event Information is the first drop down box to be completed. Select the appropriate category for the event that is to be scheduled.

8. When scheduling a WDB staff assisted workshop select the option None Selected. This will ensure that no Wagner Peyser related program will be associated with WDB staff assisted workshop.

9. The Schedule and Associated Office information should be completed based on the workshop requested. It is possible to create a recurring workshop if needed.

10. The LWIA/Region will default to the primary area based on the staff sign-on. Using the chevron button you can select a specific office where the event will occur. Staff can only schedule workshops/events for their region.

11. Event locations are automatically copied from the LWIA / Region selected in the Associated Offices section via the drop down. Specific directions information can be added in the Directions free form text box.

12. The moderator is the person(s) who have been assigned the rights to create the workshop. They will be the only staffs who are permitted to add participants to the workshop roster; however the moderator has the ability to allow participants to self-register for the workshop/event.

13. The Calendar section allows the staff to determine if the workshop/event will be hidden from public view. This selection may be changed at any time prior to the date of the event/workshop.

14. Attendance Tracking is the MOST important box when WDB staff is scheduling workshops/events. In all circumstances WDB staff should leave the Track Services for this event at its default of NO. This will disable the automatic writing of Wagner Peyser services for events/workshops conducted by the WDB.

15. Staff will also determine the Registration Method using in the Attendance Tracking box by selecting an option from the drop down box.

16. Staff will select the Close Registration Method from the drop-down box and complete any additional instructions related to the event/workshop in the Instructions box.

17. Staff will select the Save box as the final step when adding an event/workshop.
Desk Aide for adding a WIOA approved ETPL Program Please Note only * in red are required fields.

1. Select Manage Providers- Assist Providers from the left-hand drop-down menu.

2. Enter Provider Name into Provider Name 1 text box and select Search

3. Select Self-Service Education Programs under Program Heading.

4. Select Add Self Service Education Program

5. PS-CRS will already be pre-selected. In addition select PS- Approved Provider Training-ITA.

6. Enter the Program/Service Name and Description. You can use a pre-defined title description by searching the CIP code.

7. By selecting the PS – Approved Provider Training ITA listed above notice that the WIOA Program field is defaulted to Yes. The must be set to Yes for WIOA ETPL Approved Programs.

8. Select the completion level from the list below.

9. Select the Attained Credential from the list.

10. Enter the Certification License Title and the select the Certification/License type.

11. Enter the date the program was first offered, if it is Pell grant eligible, if it is in partnership with business and if so provide a description.

12. Complete the Service Information Portion of the screen including Duration, Duration type, Day or Night classes Weekend Classes, Summer Classes and Mode of Delivery. More than one selection may be made for Mode of Delivery.

13. Complete the Course Information including Class Time, Lab Time, Other Time, Weekly Schedule, Minimum Class Size, Number of Instructors, Class Frequency, and Accessibility. More than one selection may be made for Accessibility.

14. Complete Program Credentials including Credit earned Program, Number of Credits, Credit Earned Duration and Program Goal. Some Goals will allow a selection of Credentialing Body. If this occurs select None Selected from the drop-down and then enter the credentialing body.

15. Complete the External Approvals and Program Apprenticeships sections.

16. Complete the Provider Representative section including Provider Representative, Provider Representative Title, Provider Representative Application signed date and the Date Received by WIB.

17. Complete the Qualifications, Prerequisites and Equipment section.

18. Click

19. You have now completed the Program Service Details Section and can review it.
20. Complete the Program Service Occupations section by selecting Edit Occupation Details.

21. Select Save

22. Complete Program Service/Cost Details.

Click on the Calculator to select Tuition Fees, Books, Tools, and Other Costs. As you enter these items they will update the Total CRS Training Costs and Total Amount.

23. Click Save

24. Complete the Program/Service Locations.

25. Click Save. 26. Complete Program/Service Skills

27. Click Save

28. Complete Program Service Application Confirmation.

You MUST Select Submit this WIOA Approval to have it placed on the ETPL.

29. Click Save.

30. Complete Program Service/Review Status. You MUST select WIOA Approved for the program to be placed on the ETPL.

31. Contact Mary Ziomek (WIOA Admin) and submit via email the following information. a. Standard information for employer check. b. Fax release to unit. We will email the board and complete Program/State Approval Section.

Once we complete the process the Program Service Details will indicate Active with the WIOA designation.

CTHires WIOA screen changes Follow-up 6/29/16

We have been informed that the changes on WIOA application will not be embedded in the screens but, rather will be located in the following attached tab on the application. While many of these fields are not required at this time, they should all be completed.

WIOA Application PIRL Tab

From the programs tab when you click on the wizard icon ( ) staff will see a new tab:

When you click on the tab your will see the following prompts:

WIOA Application Employment Tab

The UC Status has changed:
Long term unemployed has had a screen text change:

WIOA Application Barrier Tab Two existing prompts have had a screen naming change:

The Single Parent and Cultural barriers have had Did not self-identify added

Verification has been added to “Within 2 years of exhausting TANF lifetime eligibility. Everyone has received a verification of “Other” until actual DOLETA Data Validation requirements are published:

Measurable Skills Gains for WIOA and Trade:

On the programs tab you will see a new link below the display of the activities.

The display of this will be as follows:

When you click on the Create Measurable Skills Gain link the following will appear:

As you click on the Skill Type Drop Down the screen will display appropriate prompts based upon the skill gain.

Post-secondary Transcript / Report Card

Secondary Transcript / Report Card

Training Milestone

Skills Progression

Verification on Skills Gains Screens–

At the roll out of this new form we have loaded one verification of “other” which will allow staff to type in what they are using for the verification until such time as DOLETA has published Data Validation Requirements.

For those that have Document Management/Imaging you have the ability to upload appropriate documentation for each skill gain reported.

WIOA Case Closure:

The change to the WIOA Case Closure is that School Status at exit is now required for all enrollments (Adult, Dislocated Worker and Youth) therefore we have modified the prompt appropriately as follows:

WIOA Enrollment

Issued ITA Prompt

Provider Program Records
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.

Governor’s Set Aside Funding: USDOL Training and Employment Guidance Letters issue allocations for WIOA funding each year including the percentages and mandatory activities under the Governor’s Reserve. The current set–aside is 15% of Connecticut’s funding, while for Rapid Response activities, it is 25% of the total allocation. WIOA Administration uses these funds to support Central Office staff that administer, manage and oversee the program, contracts, performance management and finances for Connecticut’s WIOA program. Once the PY allocations are determined, the CT Employment and Training Commission approves the plan. CT DOL grants flexibility and funding, using the Governor’s set aside, to the Workforce Development Boards to conduct experimental pilot programs that meet the regional needs of employers and the workforce. For example, such funds have been used to provide additional services to ex–offenders; for transportation subsidies in the Eastern WDB; and Emergency NEG–like services.

Rapid Response: For companies and their workers, the effects of a plant closing or layoff can be devastating. In Connecticut, neither companies nor workers and their unions are alone in facing these changes. Connecticut’s Rapid Response Team, headed by the State Department of Labor, (CT DOL) exists to ease the impact of layoffs and to assure that workers are offered a full range of benefits and services. The Team is made up of representatives from the CT DOL and the local Workforce Development Boards. Support is also available from the Department of Economic & Community Development and the Department of Social Services.

The Rapid Response Team is available to conduct, prior to layoffs, “Early Intervention” sessions where employees can learn about unemployment benefits, job search assistance, and training opportunities. Information is also made available on health insurance options, community services, and local agencies that provide help, advocacy, and support to dislocated workers and their families. All services provided by the team are free.

Layoff Aversion: the state of Connecticut has established the Shared Work program to enable employers to keep skilled employees working during slow–downs. In these instances, CT DOL pays partial unemployment benefits for reduced hours. This limits the impact of layoffs on employer unemployment taxes. Employee hours and wages cannot be reduced by less than 10 percent or more than 60 percent.
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 cases involving natural disasters, rapid response activities are coordinated with CT’s Department of Emergency Services and Public Protection and the local Workforce Development Boards and other state and community agencies.

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

In Connecticut, many TAA petitions are filed by Rapid Response staff members. In such cases, Rapid Response staffers have contacted the company regarding all reemployment and supportive services, including TAA. In most cases, Rapid Response staff members provide Early Intervention services at the employment site prior to layoff. Early intervention services include an overview of unemployment, job search assistance, health insurance options and possible training and employment services through both WIOA and TAA. If worker orientations are provided prior to a TAA certification, workers are given an overview of the possible benefits that may become available should the company and/or unit of the company become certified. Workers are advised as to how workers would be notified of their eligibility under TAA if the company becomes TAA certified.

In cases where an employer does not allow Rapid Response on–site to provide information on re–employment and possible TAA services prior to layoff, or where a TAA petition has been filed without prior Rapid Response knowledge, Rapid Response staff contact the employer officials listed on the TAA petition to explain Rapid Response services and to request a list of potential TAA–impacted workers’ names and addresses. Rapid Response staff members send a TAA–outreach letter to potentially impacted workers. The outreach letter advises the individual that a TAA petition has been filed, provides the US DOL TAA website where additional information on the program can be found, and describes the re–employment services that are available through our American Job Centers. Additionally, the outreach letter provides workers who would like to hear additional information to participate in a webinar on available resources. Rapid Response staff members conduct weekly webinars on available transition services, and a description of the TAA program is discussed during the presentation.

Information about TAA is available on CT DOL’s website, is disseminated by Rapid Response Teams and a detailed fact sheet on TAA benefits and terms for workers is available at: http://www.ctdol.state.ct.us/TradeAct/
In cases where Early Intervention services cannot be provided at the employer’s work site, the Rapid Response Team will mail impacted workers information packets with details on the array of services that are available to assist them. The materials will include an invitation to attend either an in-person Early Intervention session at an American Job Center, Community College, town hall or other venue or attend an interactive webinar with Rapid Response Team members.

B. ADULT AND DISLOCATED WORKERS PROGRAM REQUIREMENTS

1. IF THE STATE IS UTILIZING WORK-BASED TRAINING MODELS (E.G. ON-THE-JOB TRAINING, INCUMBENT WORKER TRAINING, TRANSITIONAL JOBS, AND CUSTOMIZED TRAINING) AS PART OF ITS TRAINING STRATEGY AND THESE STRATEGIES ARE NOT ALREADY DISCUSSED IN OTHER SECTIONS OF THE PLAN, DESCRIBE THE STATE’S STRATEGIES FOR HOW THESE MODELS ENSURE HIGH QUALITY TRAINING FOR BOTH THE PARTICIPANT AND THE EMPLOYER.

Training grants are available to help companies grow and maintain competitiveness by investing in training of their existing workforce. CT DOL Business Services Consultants work directly with companies to design, develop, and provide funding for projects and can help businesses locate appropriate training providers. Incumbent Worker Training grants are structured to be flexible to meet the business’s training objectives. Customized training is also available as administered by the Workforce Development Boards.

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

The state’s workforce system challenge is to identify effective workforce solutions and collaborative approaches that benefit both job seeker and employer customers. The Department of Labor’s Office of Apprenticeship Training works collaboratively with business and industry, economic development, education, training providers, and other partners on talent development strategies and workforce solutions to provide workers with the skills businesses need. Registered apprenticeship is a workforce solution that contributes to the development of industry–defined competencies needed by employers in the state, and serves as a proven industry–driven workforce education and preparation strategy for workers.

The Office of Apprenticeship Training invested in an aggressive training and outreach initiative to integrate registered apprenticeship into the career guidance and career exploration services offered through the American Job Center system, both virtually and as part of staff–assisted services. Through the Sector Partnership National Emergency Grant, the Office of Apprenticeship Training provides apprenticeship awareness workshops to the adult and dislocated worker customers of the American Job Centers. This is an effort to ensure that apprenticeship is included as part of the full complement of education and training services the workforce system provides to its job seeker and employer customers. Department of Labor Business Services Consultants and American Job Center partners promote the integration of apprenticeship into business engagement strategies by encouraging the development of apprenticeship programs as a solution to meet business customer needs.

While most registered apprenticeship programs are funded by program sponsors, the Office of Apprenticeship Training workforce system is strategically leveraging state and federal funds to offset training costs for employers and to develop and advance worker pipelines for both emerging and
established employers and regional industry sectors. As part of the Manufacturing Pipeline Initiative, the Office of Apprenticeship Training and the Eastern Connecticut Workforce Investment Board (EWIB) are working together to implement registered apprenticeship as a pipeline for customized training programs in manufacturing at General Dynamics/Electric Boat and members of the Eastern Advanced Manufacturing Alliance (EAMA). The American Apprenticeship Initiative (AAI) enables the Office of Apprenticeship Training to expand apprenticeship programs in new and growing industries as diverse as healthcare, Information Technology, and advanced manufacturing. While similar in purpose, the Manufacturing Innovation Fund (MIF), which is a partnership with the state’s Department of Economic and Community Development to support manufacturing companies in their efforts to implement real time, demand–driven registered apprenticeships. Lastly, Connecticut’s Apprenticeship Subsidized Training and Employment Program assists small businesses and manufacturers by offering wage subsidies for high school and college students interested in becoming an apprentice.

The strategic partnerships in Connecticut’s workforce system ensure a clearer path for participants to succeed with the job–driven opportunities that registered apprenticeship programs offer. Apprenticeship provides a flexible training delivery option and when used in the context of economic development strategies, creates a seamless pipeline of skilled workers and flexible career pathways to meet current and

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

CT DOL conducts the ETPL application process on a rolling basis. An original ETPL Pre–Application must be completed and submitted to the Lead WDB and a copy to the appropriate Secondary WDB(s)…After receiving and reviewing the Pre–Application, the Lead WDB will direct the provider to complete Application A or B and submit it for review. After this point, we anticipate the WIOA process will remain largely the same as it has been under WIA. That is, once the provider completes and submits either App. A or B, the board reviews the application and decides whether to approve the application or not. If it is approved by the board(s), the provider information will be submitted by the lead board to CT DOL for various employer checks (OSHA, Tax, Wage). If approved, CT DOL informs the board that the provider may be added to CTHires. If it cannot be approved, the provider will have the opportunity to resolve the OSHA, Tax, or Wage issues and the board may request another review for approval. Additional procedures for ETPL eligibility can be found at http://www/wia/wioa–trngproviderapps.htm The WIA process is further described in policies: http://www.ctdol.state.ct.us/wia/memos/policy/memos–ETPL.htm

Post secondary and educational institutions carrying out programs under the Higher Education Act of 1965 and entities carrying out Apprenticeship programs under the National Apprenticeship Act are automatically granted initial eligibility upon receipt of a completed application. Other apprenticeship provider eligibility procedures are an important WIOA requirement that have not yet been established.

The states policy for and procedures for eligibility of Training Providers can be found in the draft WIOA policy manual under the ELIGIBLE TRAINING PROVIDERS section as follows:

The Workforce Investment Act (WIA) established the Eligible Training Provider process as part of an overall strategy to ensure informed customer choice for training, performance accountability, and
continuous improvement. The Workforce Innovation and Opportunity Act (WIOA) further advances these goals through the alignment of the six primary federal programs that support employment and training services: Title I Adult, Dislocated Worker, and Youth Programs, Adult Education and Literacy Programs, the Wagner-Peyser Employment Service, and Title I of the Rehabilitation Act programs.

Connecticut’s Eligible Training Provider List (ETPL) identifies training providers whose performance qualifies them to receive WIOA funds to train adults and dislocated workers using Individual Training Accounts (ITAs). The Connecticut ETPL and related eligibility procedures ensure the accountability, quality, and labor-market relevance of programs of training services that receive funds through WIOA. WIOA outlines the responsibilities of the Governor and State agencies in creating and maintaining a list of eligible training providers.

A. Definitions

Eligible Training Provider is a provider of training services who has met the eligibility requirements to receive WIOA Title I Adult and Dislocated Worker funds to provide training services to eligible individuals. Eligible training providers may also receive Title I Youth funds through ITAs under certain conditions (see Section B, Training Providers Subject to ETPL Requirements).

§ 680.410 What is an eligible training provider?.

An ETP:

(a) Is the only type of entity that receives funding for training services, as defined in § 680.200, through an individual training account;

(b) Must be included on the State list of eligible training providers and programs under this subpart;

(c) Must provide a program of training services; and

(d) Must be one of the following types of entities:

(1) Institutions of higher education that provide a program which leads to a recognized postsecondary credential;

(2) Entities that carry out programs registered under the National Apprenticeship Act (29 U.S.C. 50 et seq.); or

(3) Other public or private providers of training services, which may include:

(i) Community-based organizations,
ii) Joint labor-management organizations; and (iii) Eligible providers of adult education and literacy activities under title II of WIOA if such activities are provided in combination with training services described at § 680.350.

Program of training services § 680.420 is defined as one or more courses or classes, or a structured regimen, which lead to:

1. A recognized post-secondary credential, secondary school diploma or its equivalent,

2. Employment, or

3. Measurable skill gains toward such a credential or employment.

A credential is awarded in recognition of an individual’s attainment of measurable technical or occupational skills necessary to obtain employment or advance within an occupation. These technical or occupational skills are generally based on standards developed or endorsed by employers. Please see the Policy Manual’s Section 4.90, Credentials for further information regarding credentials.

A pre-apprenticeship is a program or set of strategies designed to prepare individuals to enter and succeed in a registered apprenticeship program and has a documented partnership with at least one, if not more, registered apprenticeship program(s).

A program completer is a participant who meets all requirements of the training program.

A program exiter is a participant who left the program during the previous twelve month period for any reason (including completers).

B. Training Providers Subject to ETPL Requirements

The following types of training providers are subject to the ETPL requirements in order to receive WIOA Title I Adult and Dislocated worker funds to provide training services to these participants through ITAs. ITAs may also be used for WIOA Title I Youth funds to provide training to older, out-of-school youth (ages 18-24).

1. Institutions of higher education that provide a program of training that leads to a recognized post-secondary credential;

2. Apprenticeship programs registered by the USDOL Office of Registered Apprenticeship;

3. Public or private training providers, including joint labor-management organizations, pre-apprenticeship programs, and occupational or technical training; and

4. Providers of adult education and literacy activities provided in combination with occupational skills training (e.g., the I-BEST model).

C. Initial Eligibility and Application Process § 680.450

Eligibility Factors
The Workforce Innovation and Opportunity Act (WIOA) includes certain criteria that must be met in order to ensure that a provider of programs offers the highest quality training services and is responsive to in-demand and emerging industries by providing training services for those industries (WIOA §122(b)(4)(A)). The entity shall provide verifiable program-specific performance information based on criteria established by the state (WIOA §122(b)(4)(C)) to support the entity’s ability to serve program participants. Pursuant to WIOA §122(b)(4)(D)(i-iv), an entity seeking initial eligibility as a provider of training services must meet the following criteria:

• A factor related to indicators of performance as described in WIOA §116(b)(2)(A)(i)(I-IV) as set by Connecticut Department of Labor ETPL policy.

For an entity’s initial eligibility under WIOA (first year), the entity must document that it meets at least one of the following by submitting performance data:

• Median Earnings (Quarterly basis) - $3,459.00
• Average Wage at Placement - $9,344.00
• Attainment of a Post-Secondary Credential - 60%
• Completion Rate - 60%
• Employment Rate - 65%
• Training-related Employment Rate - 65%

For each program to be offered on the ETPL, documentation must include the program name and the most recent annual data that is available (for example, 7/1/14 - 6/30/15 or 7/1/15 - 6/30/16) for ALL individuals enrolled in the program for at least one of the factors above. The timeframe that the data is from must be stated on the documentation. If the program is new to the entity and historical data is not available, data must be tracked upon ETP approval and submitted in accordance with the requirements described at “Performance and Reporting.”

• A factor concerning whether the provider is in a partnership with business. Consideration for satisfying this factor will include active involvement (not just membership) in: a local Chamber of Commerce, the Connecticut Business and Industry Association (CBIA) or other local business association, Connecticut Workforce Development Board, Advisory Boards (colleges/universities), clinical partnership agreements, internships/externships with businesses, and affiliations with business associations. Submit a list of partnerships and describe the nature of the partnership.

• Other factors that indicate high-quality training services. If the applying entity is required by Connecticut statute to be approved by the Connecticut Office of Higher Education, State Department of Education, or Department of Public Health to offer training, this Eligibility Factor will be deemed as met. All other entities must comply with federal and state ETP credential policies in order for this (high-quality) Eligibility Factor to be deemed as met. In regard to a program’s credential outcome, ALL applying entities’ program offerings must result in credential attainment that complies with federal and state ETP credential policies in order for the program to be considered for approval.
• A factor concerning alignment of the training services with in-demand industry sectors and occupations. To satisfy this factor, review the in-demand occupations listed on CTDOL’s website, http://www1.ctdol.state.ct.us/lmi/projections.asp, and provide documentation from the site to verify the training service is specifically related to an in-demand industry sector or occupation. Otherwise, provide information and documentation to show the extent to which the training service(s) aligns with the in-demand industry sectors and occupations displayed on this CTDOL website. In-demand occupations may vary at the local level; applying providers may consult with the lead WDB.

B. Performance and Reporting

The Workforce Innovation and Opportunity Act (WIOA) includes certain performance and reporting requirements.

Approval as a WIOA provider requires your agreement that your entity’s ETP approval is contingent upon meeting the state minimum criteria for performance, pursuant to the requirements of the Workforce Innovation and Opportunity Act. Such criteria will include program completion rates, entered employment/placement rates, placement wages, and any other performance indicators established by CTDOL. Eligible training providers will be required to report to CTDOL, in the format prescribed by CTDOL, all applicable program performance and cost information for ALL individuals enrolled in a program, for the periods prescribed by CTDOL, which periods will also include some quarters following program exit. This performance data will be made available to the public on-line at CTDOL’s ETPL website in accordance with federal and state law. Further, approval as a WIOA provider requires your agreement to release all student information for relevant placement and past performance in other areas.

G. Exceptions to the ITA and ETPL Requirements

There are several exceptions to the required use of an ITA for training. In situations covered by these exceptions, a contract for services may be used to provide for training in lieu of the ETPL process.

1. On-the-job training, customized training, incumbent worker training, internships, paid or unpaid work experience, and transitional employment are not included in the eligible training provider list and therefore are not subject to the eligibility requirements.

2. Where the State Workforce Innovation Board (SWIB) determines there are an insufficient number of eligible providers in the local area to accomplish the purpose of an ITA. The State plan and policy must describe how this determination was made and the process used for contracting for services.

3. If the SWDB determines that a community-based organization (CBO) or nonprofit whose primary mission is to serve individuals with barriers to employment provides effective training services. The SWDB must develop criteria in policy to determine that the program is effective.

4. Training for multiple individuals in high-demand industry sectors or occupations, as long as the contract does not limit the individual’s consumer choices.

5. Circumstances in which a pay-for-performance contract is appropriate, if the SWDB chooses to utilize this strategy.
Registered apprenticeship programs are not subject to the application or performance reporting requirements. Any apprenticeship program may remain on the ETPL as long as it remains registered by the USDOL Office of Registered Apprenticeship.

H. Conditions for Removal from the ETPL § 680.470

The State may remove a program or programs from the list for failing to meet the established criteria or performance levels in this policy, or for not providing all required performance information for subsequent eligibility. Removal is also appropriate if the program has failed to attain or lost the accreditation required for professional licensure. A training provider that is removed from the list for reasons stated above may reapply for continued eligibility when they can demonstrate that they meet all requirements.

Any providers that willfully supply false performance information, misrepresent costs or services, or substantially violate requirements of WIOA law will be removed from the ETPL by the State for a period of not less than two years. Providers are liable to repay all adult, dislocated worker, and youth funds received during the period of non-compliance.

No training provider debarred by the Federal Government may be permitted to be placed or remain on the ETPL.

In the case of a training provider or a program of training services that is removed from the list while WIOA participants are enrolled, the participants may complete the program unless the provider or program has lost state licensing, certification, or authorization to operate by the appropriate state oversight agency.

I. Appeal Process

Training providers can choose to appeal the rejection of their program for inclusion on the ETPL, or its subsequent termination of eligibility. For any appeal by a training provider, an appeal must be submitted in writing via email to within 14 days after notification of the decision. The appeal must include the justification for the appeal in their request. The training provider also has the right to request a hearing to discuss their appeal.

The appeals procedure will allow for a hearing if requested and a decision will be made within 60 days of appeal. This will be a final decision and the program will be unable to reapply through the ETPL eligibility process for one year from the date of final notification by the State.

J. Short-term Prevocational Training

Short-term Prevocational Training of approximately one week or less which does not provide an industry-recognized certification or a credential upon completion shall not require application to become an Eligible Training Provider.

K. Required Performance Data § 680.490

The following information is required from eligible training providers in order to remain eligible:
1. Type and number of recognized postsecondary credentials received by all students.

2. Cost of attendance, including costs of tuition and fees for all participants in the program

3. Program completion rate for all students

The following demographic information is encouraged but is not required:

1. Social Security Number

2. Race

3. Ethnicity

4. Gender

5. Date of Birth

6. Disability Status

7. Citizen Status

The following performance outcomes will be determined by the State based on the Social Security Numbers provided for each program, which will be matched to state wage data:

1. The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program.

2. The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program.

3. The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program.

4. The percentage of program participants who obtain a recognized post-secondary credential, or a secondary school diploma or its recognized equivalent during participation in or within one year after exit from the program.

L. Continued Eligibility Procedure is currently being developed and will be submitted upon completion.
4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR THE PRIORITY FOR PUBLIC ASSISTANCE RECIPIENTS, OTHER LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT IN ACCORDANCE WITH THE REQUIREMENTS OF WIOA SEC. 134(C)(3)(E), WHICH APPLIES TO INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES FUNDING BY THE ADULT FORMULA PROGRAM.

The State describes its implementation and monitoring of these individuals via its draft WIOA Policy manual under sections: ADULT AND DISLOCATED WORKER ELIGIBILITY AND SERVICE PRIORITY and YOUTH ELIGIBILITY AND SERVICE PRIORITY as follows:

ADULT AND DISLOCATED WORKER ELIGIBILITY AND SERVICE PRIORITY

I. General Eligibility Requirements § 680.130 A. To receive Title I B Adult or Dislocated Worker individualized career and training services, an individual must: 1. Be a U.S. Citizen or Registered Alien; and 2. Meet Selective Service Registration requirements, if applicable. B. Additional Eligibility Requirements for Adults 1. Individuals must be 18 years of age or older and 2. Meet the service priority required for adults (e.g., low-income and public assistance recipients).

C. Additional Eligibility Requirements for Dislocated Workers An individual must meet the WIOA definition of a dislocated worker or displaced homemaker definition as found in Part III of this Section and the Glossary of Terms and Definitions.

§ 680.130 What are the eligibility criteria for career services for dislocated workers in the adult and dislocated worker programs?

(a) To be eligible to receive career services as a dislocated worker in the adult and dislocated worker programs, an individual must meet the definition of “dislocated worker” at WIOA sec. 3(15). Eligibility criteria for training services are found at § 680.210. (b) Governors and Local Workforce Development Boards (WDBs) may establish policies and procedures for one-stop centers to use in determining an individual’s eligibility as a dislocated worker, consistent with the definition at WIOA sec. 3(15). These policies and procedures may address such conditions as:

(1) What constitutes a “general announcement” of plant closing under WIOA sec. 3(15)(B)(ii) or (iii); (2) What constitutes “unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters” for determining the eligibility of self-employed individuals, including family members and farm workers or ranch hands, under WIOA sec. 3(15)(C); and (3) What constitutes “unlikely to return to a previous industry or occupation” under WIOA sec. 3(15)(A)(iii), consistent with § 680.660.

§ 680.140 What Workforce Innovation and Opportunity Act title I adult and dislocated worker services are Local Workforce Development Boards required and permitted to provide?

(a) WIOA title I formula funds allocated to local areas for adults and dislocated workers must be used to provide career and training services through the one-stop delivery system. Local WDBs determine the most appropriate mix of these services, but both types must be available for eligible adults and dislocated workers. Different eligibility criteria apply for each type of services. See §§ 680.120, 680.130, and 680.210.
(b) WIOA title I funds also may be used to provide the additional services described in WIOA sec. 134(d), including: (1) Job seeker services, such as: (i) Customer support to enable individuals with barriers to employment (including individuals with disabilities) and veterans, to navigate among multiple services and activities; (ii) Training programs for displaced homemakers and for individuals training for nontraditional employment (as defined in WIOA sec. 3(37) as occupations or fields of work in which individuals of one gender comprise less than 25 percent of the individuals so employed), in conjunction with programs operated in the local area; (iii) Work support activities for low-wage workers, in coordination with one-stop partners, which will provide opportunities for these workers to retain or enhance employment. These activities may include any activities available under the WIOA adult and dislocated worker programs in coordination with activities and resources available through partner programs. These activities may be provided in a manner that enhances the worker’s ability to participate, for example by providing them at nontraditional hours or providing on-site child care; (iv) Supportive services, including needs-related payments, as described in subpart G of this part; and (v) Transitional jobs, as described in § 680.190, to individuals with barriers to employment who are chronically unemployed or have an inconsistent work history;

(2) Employer services, such as: (i) Customized screening and referral of qualified participants in training services to employers; (ii) Customized employment-related services to employers, employer associations, or other such organization on a fee-for-service basis that are in addition to labor exchange services available to employers under the Wagner-Peyser Act Employment Service; (iii) Activities to provide business services and strategies that meet the workforce investment needs of area employers, as determined by the Local WDB and consistent with the local plan (see § 678.435 of this chapter and WIOA sec. 134(d)(1)(A)(ix)); and

(3) Coordination activities, such as:

(i) Employment and training activities in coordination with child support enforcement activities, as well as child support services and assistance activities, of the State and local agencies carrying out part D of title IV of the Social Security Act (42 U.S.C. 651 et seq.); (ii) Employment and training activities in coordination with cooperative extension programs carried out by the Department of Agriculture; (iii) Employment and training activities in coordination with activities to facilitate remote access to services provided through a one-stop delivery system, including facilitating access through the use of technology; (iv) Improving coordination between workforce investment activities and economic development activities carried out within the local area involved, and to promote entrepreneurial skills training and microenterprise services; (v) Improving services and linkages between the local workforce development system (including the local one-stop delivery system) and employers, including small employers, in the local area; (vi) Strengthening linkages between the one-stop delivery system and the unemployment insurance programs; and (vii) Improving coordination between employment and training activities and programs carried out in the local area for individuals with disabilities, including programs carried out by State agencies relating to intellectual disabilities and developmental disabilities, activities carried out by Statewide Independent Living Councils established under sec. 705 of the Rehabilitation Act of 1973 (29 U.S.C. 796d), programs funded under part B of chapter 1 of title VII of such Act (29 U.S.C. 796e et seq.), and activities carried out by centers for independent living, as defined in sec. 702 of such Act (29 U.S.C. 796a).
§ 680.150 What career services must be provided to adults and dislocated workers? (a) At a minimum, all of the basic career services described in WIOA secs. 134(c)(2)(A)(i)-(xi) and § 678.430(a) of this chapter must be provided in each local area through the one-stop delivery system. (b) Individualized career services described in WIOA sec. 134(c)(2)(A)(xii) and § 678.430(b) of this chapter must be made available, if determined appropriate in order for an individual to obtain or retain employment. (c) Follow-up services, as described in WIOA sec. 134(c)(2)(A)(xiii) and § 678.430(c) of this chapter, must be made available, as determined appropriate by the Local WDB, for a minimum of 12 months following the first day of employment, to participants who are placed in unsubsidized employment.

§ 680.160 How are career services delivered? Career services must be provided through the one-stop delivery system. Career services may be provided directly by the one-stop operator or through contracts with service providers that are approved by the Local WDB. The Local WDB only may be a provider of career services when approved by the chief elected official and the Governor in accordance with the requirements of WIOA sec. 107(g)(2) and § 679.410 of this chapter.

II. Service Priority For WIOA Adults (WIOA Law Section 134(c)(3)(E)) § 680.600 Career services are universally available to all individuals entering a one-stop system facility. However, covered persons (veterans and eligible spouses of veterans) are given priority of service over non-covered persons.

A. Adult Service Priority 1. Priority for individualized career and training services shall be given to recipients of public assistance; low-income; and individuals who are basic skills deficient, consistent with the Workforce Innovation and Opportunity Act. WIOA defines a Low-Income individual as an individual who: (a) Receives, or in the past six (6) months has received, or is a member of a family that receives, or in the past six (6) months has received assistance through: (1) SNAP in accordance with the Food and Nutrition Act of 2008; or (2) TANF under Part A of Title IV of the Social Security Act; or (3) SSI (supplemental security income) established under Title XVI of the of the Social Security Act; or (4) State or local income-based public assistance. In Connecticut this is General Assistance (GA); Refugee Cash Assistance (RCA); and HUSKY Medical. (b) Received an income,
or is a member of a family that received a total family income that did not exceed the higher of: (1) the poverty line; or (2) 70 percent of the lower living standard income level. Connecticut uses the 70 percent of the lower living standard income level to determine low-income. Refer to Section 3.70 Income/Family Size Determination for the Income Table for Adults and Youth and guidance on what income must be included and or income that may excluded in determining low-income. (c) Qualifies as a homeless individual as defined Section 41403(6) of the Violence Against Women Act of 1994; (d) is an individual with a disability whose own income meets the requirements of a program described in subparagraph b., but who is a member of a family whose income does not meet this requirement. § 680.640 WIOA Law Sec. 3 (36)

2. Individuals who are recipients of public assistance (TANF, SNAP, Supplemental Security Income (SSI), HUSKY, Refugee Cash Assistance (RCA), and General Assistance (GA) are considered to meet Categorical Income Eligibility and may be automatically income eligible and no further income verification is required if the individual has provided acceptable documentation. (a) (1) SNAP documentation must be current and verify that the individual receives or is a member of a household that is receiving SNAP benefits as described in 1. (a). Examples of documentation include the Letter of Award if the individual is the recipient, or documentation that lists the individual is a member of the household receiving SNAP, and documentation such as a SNAP benefit summary showing the dates to verify that benefits were received within the six-month period prior to application to a WIOA program. (2) HUSKY MEDICAL: Medicaid card must be in the applicant’s name. (b) Cash Public Assistance: (1) TANF documentation must be current and verify that the individual is receiving or is a member of a family that is receiving TANF payments at the time of application to a WIOA program. Examples of acceptable documentation include the Letter of Award if the individual is the recipient, or documentation that lists the individual as a member of the family currently receiving TANF, and documentation such as the TANF benefit summary that shows the dates of the public assistance. (2) SSI, RCA and GA are payments made to a single recipient. The individual applying to WIOA must be the recipient at the time of application to a WIOA program in order to be considered as receiving public assistance and would be considered as a family of one. Examples of acceptable documentation include the Award Letter or other authorization notice to receive cash public assistance. B. Dislocated Worker Priority for Individualized Career and Training Services The Workforce Innovation and Opportunity Act does not provide a priority of service requirement for dislocated workers. However, plant closures or significant dislocation events are given priority for Individualized Career and Training services. All other eligible individuals impacted are considered of equal status for receipt of services notwithstanding federal requirements pertaining to priority for covered persons (veterans and eligible spouses).

C. Priority of Service for Covered Persons, also known as Veterans’ Priority of Service (P.L. 107-288 (Jobs for Veterans Act) and 20 CFR Part 1010) § 680.650§ 680.660 1. Veterans and eligible spouses of veterans (covered persons) are entitled to priority over non-covered persons for the receipt of employment, training, and placement services provided under new or existing USDOL-funded job training programs. See definition of Covered Persons in the glossary. 2. Veterans priority of service does NOT change a program’s intended functions; covered persons still need to meet all program eligibility requirements. 3. Priority of service applies to every qualified job training program funded, in whole or in part by USDOL including: a. Any such program or service that uses technology to assist individuals to access workforce development programs (such as job and training opportunities, labor market information, career assessment tools, and related support services); b. Any such program or service under the public employment service system, One-Stop Career Centers, the Workforce Innovation and Opportunity Act of 2014, a demonstration or other temporary program; and b. Any workforce development program targeted to specific groups, and those
programs implemented by States or local service providers based on Federal block grants administered USDOL.

4. Service Providers must ensure a process for identifying covered persons at the point of entry including enrollment into workforce services, to allow covered persons to take full advantage of priority of service. Identification does not mean verification of veteran status. Self-identified veterans must be made aware of: a. Their entitlement to priority of service; b. The full array of employment, training, and placement services available under priority of service; and c. Any applicable eligibility requirements for those programs and/or services.

III. Dislocated Worker Eligibility Criteria

A dislocated worker, for the purposes of the Title I of the Workforce Innovation and Opportunity Act, is an individual who: A. (i) has been terminated or laid off from their job, or who received a notice of termination or layoff, from their employer;* (ii) (I) is eligible for or has exhausted their unemployment payments; or (II) has been employed for a duration sufficient to demonstrate attachment to the workforce, but cannot get unemployment compensation because of low earnings or having done work for an employer not covered under a State unemployment compensation law; and (iii) is unlikely to return to a previous industry or occupation; ** B. (i) has been terminated or laid off, or has received a notice of termination or layoff, from employment as a result of any permanent closure of, or any substantial layoff at, a plant, facility or enterprise; (ii) is employed at a facility which the employer has made a general announcement that such facility will close within 180 days; or (iii) for purpose of eligibility to receive services other than training services, intensive services or supportive services, is employed at a facility at which the employer has made a general announcement that such facility will close; C. was self-employed (including employment as a farmer, rancher, or a fisherman) but is unemployed as a result of general economic conditions in the community in which the individual resides or because of natural disasters; or D. is a displaced homemaker (must meet the dislocated worker definition of a displaced homemaker). E. (i) is the spouse of a member of the Armed Forces on active duty (as defined in section 101(d)(1) of title 10, United States Code), and who has experienced a loss of employment as a direct result of relocation to accommodate a permanent change in duty station of such member; or (ii) is the spouse of a member of the Armed Forces on active duty and who meets the criteria described in paragraph (16)(B). WIOA Sec. 3(15)

DISPLACED HOMEMAKER.—The term “displaced homemaker” means an individual who has been providing unpaid services to family members in the home and who— (A)(i) has been dependent on the income of another family member but is no longer supported by that income; or (ii) is the dependent spouse of a member of the Armed Forces on active duty (as defined in Section 101(d)(1) of title 10, United States Code) and whose family income is significantly reduced because of a deployment (as defined in Section 991(b) of title 10, United States Code, or pursuant to paragraph (4) of such section), a call or order to active duty pursuant to a provision of law referred to in Section 101(a)(13)(B) of title 10, United States Code, a permanent change of station, or the service-connected (as defined in Section 101(16) of title 38, United States Code) death or disability of the member; and (B) is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment. WIOA Sec. 3(16)(B)

*Separating military service members (non-retiree) and military spouses may be enrolled for services as dislocated workers if they meet the definitions set forth in TEGL 22-04 Section 4.

Recently separated veterans and transitioning service members are considered to have received a notice of termination or layoff from their employer (DD-214) per III.A.(i) of this Section. For full
definitions of Recently Separated Veteran and Transitioning Service Member see the Glossary of Terms and Definitions on DLI’s WIOA website.

**Connecticut’s UI profiling and referral process satisfies the criteria necessary to meet category A. of the dislocated worker definition. Claimants who have been referred from the Unemployment Insurance Division through Worker Profiling, REA/RES, EUC REA and REA Pilot meet the definition. In such cases, documentation of the referral is sufficient to establish dislocated worker eligibility. 20 CFR Part 663. Introduction Subpart A.2. Registration and Eligibility**

§ 680.610 Does the statutory priority for use of adult funds also apply to dislocated worker funds? No, the statutory priority only applies to adult funds and only applies to providing individualized career services, as described in § 680.150(b), and training services. Funds allocated for dislocated workers are not subject to this requirement.

IV. Eligibility Verification

Verification of eligibility is used to ensure the reliability of the participant information system, to guarantee services are provided to persons most in need, and to avoid potential disallowed costs. Once an applicant is determined to be eligible, verification of eligibility must be completed. CTHires allows for the verification of each required element. Documentation may be uploaded or scanned to the VOS system. If verification is not contained in the CTHires system it must be in the participant’s case file. No individualized career services may be provided until the participant has furnished proof of eligibility to the enrolling agency.

The primary responsibility for providing documentary evidence rests with the applicant/potential participant. Copies of all documentary evidence must be maintained in the participant’s file or the CTHires system. For those ex-service members without a DD-214, service providers should work with local or State veterans’ staff to obtain a copy. The lack of a DD-214 cannot be used to deny services; it is the responsibility of the provider – in concert with the individual – to obtain a DD-214 in the absence of other allowable documentation.

If an applicant is unable to produce the necessary documents to prove eligibility, service providers have two options to determine eligibility. They can verify information given via telephone contact with an employer or by document inspection, or an applicant statement may be used (use is limited). However, service providers must ensure applicant statements and/or staff verification are allowable from the perspective of federal data validation requirements.

YOUTH ELIGIBILITY AND SERVICE PRIORITY

A. General Requirements In order to be considered eligible for the WIOA Title IB youth program an individual must be: 1. a U.S. Citizen or Registered Alien; 2. between the ages of 14 and 24 at the time of enrollment; and 3. must meet Selective Service Registration requirements. Note: Youth who become of age for Selective Service registration after enrollment must meet Selective Service requirements by, or within 30 days of, their 18th birthday. B. Eligibility Requirements Income Eligibility: With the exception of youth enrolled under the 5% low income exclusion and specific out-of-school youth barriers that do not require that youth be low-income all other youth must meet the WIOA definition of a low-income individual. WIOA defines a Low-Income individual as an individual who: (a) Receives, or in the past six (6) months has received, or is a member of a family that receives, or in the past six (6) months has received assistance through: (1) SNAP in accordance with the Food and Nutrition Act of 2008; or (2) TANF under Part A of Title IV of the Social Security Act; or (3) SSI (supplemental security income) established under Title XVI of the Social Security Act; or (4) State or local income-based public assistance. In Connecticut this is General
Individuals who are recipients of public assistance (TANF, SNAP, Supplemental Security Income (SSI), HUSKY Medical, Refugee Cash Assistance (RCA), and General Assistance (GA) are considered to meet Categorical Income Eligibility and may be automatically income eligible and no further income verification is required if the individual has provided acceptable documentation. (a) (1) SNAP documentation must be current and verify that the individual receives or is a member of a household that is receiving SNAP benefits as described in 1. (a). Examples of documentation include the Letter of Award if the individual is the recipient, or documentation that lists the individual is a member of the household receiving SNAP, and documentation such as a SNAP benefit summary showing the dates to verify that benefits were received within the six-month period prior to application to a WIOA program. (b) Cash Public Assistance: (1) TANF documentation must be current and verify that the individual is receiving or is a member of a family that is receiving TANF payments at the time of application to a WIOA program. Examples of acceptable documentation include the Letter of Award if the individual is the recipient, or documentation that lists the individual as a member of the family currently receiving TANF, and documentation such as the TANF benefit summary that shows the dates of the public assistance. (2) SSI, RCA and GA are payments made to a single recipient. The individual applying to WIOA must be the recipient at the time of application to a WIOA program in order to be considered as receiving public assistance and would be considered as a family of one. Examples of acceptable documentation include the Award Letter or other authorization notice to receive cash public assistance. § 68 681.270 May a local program use eligibility for free or reduced price lunches under the National School Lunch Program as a substitute for the income eligibility criteria under title I of the Workforce Innovation and Opportunity Act? Yes, WIOA sec. 3(36) defines a low-income individual to include an individual who receives (or is eligible to receive) a free or reduced price lunch under the Richard B. Russell National School Lunch Act.

§ 681.200 Eligible Youth: means an in-school youth or an out-of-school youth. WIOA Law Sec. 3(18) The Workforce Innovation and Opportunity Act of 2014 separates youth into two separate categories: In-school youth ages 14-21; and out-of-school youth ages 16-24 at the time of enrollment. WIOA In-School Youth § 681.220 Eligible in-school youth must be: (a) Attending school, including secondary or post-secondary school. WIOA does not consider providers of Adult Education under WIOA Title II, YouthBuild programs, and Job Corps programs to be “schools”. A youth who is home-schooled may be considered in-school or out-of-school depending on whether or not the home-school is registered with the County Superintendent of Schools. WIOA youth providers should verify registration to determine the applicant’s school status. (b) Not younger than 14 (unless an individual with a disability who is attending school under State law) and not older than 21 at the time enrollment (age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 21 once they are enrolled in the program) and any one of the following categories; and (c) Low-income and is one or more of the following: 1. Basic Skills deficient; 2. An
English Language Learner; 3. An offender; 4. A homeless individual which may include: ? runaway youth; ? youth in foster care or has aged out of the foster care system; ? youth eligible for assistance under Sec. 477 of the Social Security Act (Chafee Foster Care Independence Program); or ? youth in an out-of-home placement 5. Pregnant or parenting; 6. Individual with a disability; 7. An individual who requires additional assistance to: (a) complete an educational program: a youth who is at risk of dropping out of high school as documented by his/her school; or had previously dropped out of an educational program but has returned to school (including an alternative school); has below average grades; or a youth with poor attendance patterns in an educational program during the last 12 calendar months; or has previously been placed in out-of-home care (foster care, group home, or kinship care) for more than 6 months. OR (b) secure and hold employment: an in-school youth who has not held a job for more than three consecutive months; or has a poor work history to include no work history; or has been fired from a job in the last 6 calendar months; or lacks work readiness skills necessary to obtain and/or retain employment. ? Not more than 5% of the in-school youth may be assisted under the additional barrier. WIOA Law Sec. 129 (a)(C)(3)(B) ? Prior to enrollment using this barrier case managers must obtain availability approval from WIOA Youth Program Manager.

WIOA Out-Of-School (OSY) Youth § 681.210 The intent of WIOA is to serve more OSY who are disconnected from school and work. Out-of-school status is determined at the time of enrollment and once the youth is enrolled as an Out-of-School Youth (OSY), that status continues for the duration of the youth’s enrollment, even if the youth later returns to school.

Out-of-school participation for reporting OSY expenditures: WIA enrollments: WIA out-of-school participants still enrolled in the WIA youth program as of June 30, 2015 are considered grandfathered into the WIOA youth program. This means that the school status of the youth enrolled in WIA remains the same under WIOA so if the youth was enrolled as out-of-school in WIA that youth remains an out-of-school youth under WIOA.

WIOA enrollment: The school status remains the same throughout the youth’s participation in the WIOA youth program for purposes of reporting against the OSY expenditure requirement. If the youth is determined to be an OSY at the time of WIOA enrollment and subsequently re-enters high school or enrolls in postsecondary education, that youth is still considered OSY throughout their participation in the WIOA youth program. (TEGL 8-15)

For OSY who are subject to the justice system, homeless, pregnant or parenting, or have a disability, income eligibility documentation is not required. WIOA Regs. 20 CFR Part 681.250

Eligible out-of-school youth are youth who are: (a) Not attending any school (a youth who is home-schooled may be considered either in-school or out-of-school dependent upon whether or not the home-school is registered with or has notified the County Superintendent of Schools. WIOA youth providers should verify registration or notification in order to determine the applicant’s school status.). § 681.230 NOTE: Adult Education under WIOA Title II, YouthBuild programs, and Job Corps programs are not considered to be “schools” under WIOA; (b) Not younger than 16 and not older than age 24 at time of enrollment. Because age eligibility is based on age at enrollment, participants may continue to receive services beyond the age of 24 once they are enrolled in the program; and (c) One or more of the following: 1. School dropout; § 681.240 ? A youth attending an alternative school at the time of registration is not a dropout. 2. Youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. School year calendar quarter is based on how a local school district defines its school year quarters; 3. A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is either: a. basic skills deficient; or b. an English
language learner; 4. An individual who is subject to the juvenile or adult justice system; 5. A homeless individual which may include: ? runaway youth; ? youth in foster care or has aged out of the foster care system; ? youth eligible for assistance under Sec. 477 of the Social Security Act (Chafee Foster Care Independence Program); or ? youth in an out-of-home placement 6. Pregnant or parenting; 7. Individual with a disability; 8. A low-income individual who requires additional assistance to: (1) complete an educational program; a youth who is in need of a high school diploma or equivalent; or has dropped out of a post-secondary educational program during the past 12 calendar months; or has a diploma but requires additional education; OR (2) secure and hold employment: a youth that is not currently attending any school (including a youth with a diploma or equivalent) who has not held a full-time job for more than three consecutive months; or has a poor work history, to include no work history; or has been fired from a job in the last 6 calendar months; or lacks work readiness skills necessary to obtain and retain employment;

§ 681.290 How does the Department define the “basic skills deficient” criterion in this part? (a) As defined in § 681.210(c)(3), a youth is “basic skills deficient” if he or she:

(1) Have English reading, writing, or computing skills at or below the 8 a generally accepted standardized test; or

(2) Are 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.

(b) The State or Local WDB must establish its policy on paragraph (a)(2) of this section in its respective State or local plan.

(c) In assessing basic skills, 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.

§ 681.300 How does the Department define the “requires additional assistance to enter or complete an educational program, or to secure and hold employment” criterion in this part for OSY? Either the State or the local level may establish definitions and eligibility documentation requirements for the “requires additional assistance to enter or complete an educational program, or to secure and hold employment” criterion of § 681.210(c)(9). In cases where the State WDB establishes State policy on this criterion, the State WDB must include the definition in the State Plan. In cases where the State WDB does not establish a policy, the Local WDB must establish a policy in its local plan if using this criterion.

§ 681.310 How does the Department define the “requires additional assistance to complete an educational program, or to secure and hold employment” criterion in this part for ISY? (a) Either the State or the local level may establish definitions and eligibility documentation requirements for the “requires additional assistance to complete an educational program, or to secure and hold employment” criterion of § 681.220(d)(8). In cases where the State WDB establishes State policy on this criterion, the State WDB must include the definition in the State Plan. In cases where the State WDB does not establish a policy, the Local WDB must establish a policy in its local plan if using this criterion. (b) In each local area, not more than five percent of the ISY newly enrolled in a given program year may be eligible based on the “requires additional assistance to complete an educational program or to secure or hold employment” criterion. § 681.250 C. Five-Percent (5%) Low Income Eligibility Exception Up to five-percent of all WIOA in-school and/or out-of-school youth participants may be participants who ordinarily would be required to be low-income for eligibility
purposes and who meet all other eligibility criteria for WIOA except the low-income criteria. Youth enrolled under the 5% window are considered to be 5% throughout their enrollment and follow up.

D. Youth Service Priority

1. Priority for services shall be given to recipients of public assistance and low-income individuals consistent with the Workforce Innovation and Opportunity Act.

WIOA Section 3 (36) defines a Low-Income individual as an individual who: (a) receives, or in the past six (6) months has received, or is a member of a family that is receiving or in the past six (6) months has received, assistance through SNAP, cash payments under a Federal, State, or local income-based public assistance program such as TANF (Temporary Assistance for Needy Families), SSI (Supplemental Security Income), General Assistance (GA) or Refugee Cash Assistance (RCA); (b) received an income, or is a member of a family that received a total family income, for the 6-month period prior to application for the program involved (exclusive of unemployment compensation, child support payments, cash public assistance, and old-age and survivors insurance benefits under the Social Security Act that, in relation to family size, does not exceed the higher of (I) the poverty line, for an equivalent period; or (II) 70 percent of the lower living standard income level, for an equivalent period (see Section 3.70 Income/Family Size Determination for guidance on how low-income status is determined); (c) receives or is eligible to receive a free or reduced price lunch under the Richard B. Russell National School Lunch Act; (d) qualifies as a homeless child or youth individual as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)) the Steward B. McKinney Homeless Assistance Act; (e) is an individual with a disability whose own income meets the requirements of a program described in subparagraph (a) or (b), but who is a member of a family whose income does not meet such requirements. (f) is a youth in foster care on behalf of whom State or local government payments are made.

2. Individuals who are recipients of public assistance (TANF, SNAP/Food Stamps, Supplemental Security Income (SSI), Refugee Cash Assistance (RCA), and General Assistance (GA)) may meet Categorical Income Eligibility and considered automatically income eligible and no further income verification is required if the individual has provided acceptable documentation. (a) SNAP (Food Stamp) documentation must be current and verify that the individual receives or is a member of a household that is receiving SNAP benefits as described in 1. (c). Examples of documentation include the Letter of Award if the individual is the recipient, or documentation that lists the individual as a member of the family receiving SNAP, and documentation such as a SNAP benefit summary showing the dates to verify that benefits were received within the six-month period prior to application to a WIOA program.

(b) Cash Public Assistance: (1) TANF documentation must be current and verify that the individual receives or in the past six (6) months has received TANF payments, or is a member of a family that is receiving or in the past six (6) months has received TANF payments. Examples of acceptable documentation include the Letter of Award if the individual is the recipient, or documentation that lists the individual as a member of the family currently receiving TANF, and documentation such as the TANF benefit summary that shows the dates of the public assistance. Refer to the appropriate Verification Worksheet for complete list of acceptable documentation. (2) SSI, RCA and GA are payments made to a single recipient. The individual applying to WIOA must be the recipient and is currently receiving SSI, RCA or GA in order to be considered as receiving public assistance and would be considered as a family of one. Examples of acceptable documentation include the Award Letter or other authorization notice to receive cash public assistance.
3. Free or Reduced Lunch: The individual must be an in-school youth at the time of enrollment. If the youth is attending a school that provides free lunch to all students then the youth is considered to be receiving free lunch. Verification documentation for free or reduced lunch eligibility must be current or, in the case of youth enrolling during the summer, verify that the lunch eligibility was determined no more than one year (or previous school year) prior to WIOA eligibility determination.

4. Veterans’ Priority for Service. Covered Persons’ Priority: Refer to Section C. of WIOA 3.10 Adult and Dislocated Worker and the Glossary for further clarification of covered persons and priority for service.

E. Funding Requirements 1. WIOA Youth Program Elements: WIOA Title IB youth funds must be used to provide the following youth elements to eligible youth. Youth providers are not required to provide every WIOA element to youth however every element must be made known and available to youth. (Refer to Section 4.10 Youth Services and Activities for the list of requirement elements) 2. Out-of-School Youth Program: WIOA Law and Regulations require that 75% of WIOA funds allocated to youth programs must be used to provide activities to out-of-school youth. WIOA Law Sec. 129 (a)(4)(A) WIOA Regs. 20 CFR Part 681.410 3. Youth Work Experience: Local youth programs must expend not less than 20 percent of the funds allocated to them to provide in-school youth and out-of-school youth with paid and unpaid work experiences that have academic and occupational education as a component of the work experience. WIOA Regs. 20 CFR Part 681.590

Allowable expenditures for work experience can include: a. wages paid to the youth in work experience; b. staff time spent identifying potential work experience opportunities; c. staff time working with employers to develop the work experience; d. staff time spent working with employers to ensure a successful work experience; e. participant work experience orientation sessions, classroom training or the required academic education component directly related to the work experience; f. orientation for employers. Adequate documentation must be maintained to ensure expenditures are legitimate and allowable.

F. Parent/Guardian Program Participation Consent Enrolling a minor into WIOA without parental consent can put the Connecticut Department of Labor and WIOA Youth Service providers at risk of being sued and increases liability, particularly if the participant is injured or mistreated. Service providers must obtain signed consent from a parent or guardian for youth who are under the age of 18. In situations where an unaccompanied minor, not in foster care, with no one assuming Legal Custody of them (most generally these are homeless or runaway youth) they are allowed to sign for themselves. Case managers must have very detailed case notes documenting the youth’s situation and also comment on the consent form and place the form in the participant’s file/CTHires case notes.

Monitoring is covered under the Monitoring Section as follows:

EVALUATION AND TECHNICAL ASSISTANCE

Monitoring, evaluation and technical assistance is an integral part of the oversight responsibilities required by law. Monitoring and evaluation identify areas of strength and weakness in program operation with the intent of improving program performance. Technical assistance increases program operation and management capabilities.
Monitoring is an essential part of program management to ensure compliance with appropriate laws, regulations, plans, provider agreements, policies and procedures. Monitoring provides the opportunity to strengthen or improve programs and systems to promote continuous improvement.

The One Stop Operator may conduct supplemental oversight reviews of providers to determine the extent to which the provider is assisting in the development and operation of the One Stop Center. The One Stop Operator may recommend that a service provider take a course of corrective action for any deficiencies found in the provider’s operations that relate to the One Stop Center.

Special onsite reviews may be conducted to investigate allegations of mismanagement or to clarify unusual findings. Special reviews may or may not result in corrective action. A special review could lead to the implementation of an investigation of known or suspected incidents of fraud, program abuse, or criminal conduct.

A. Monitoring Process § 683.410 1. The DOL WIOA Administration unit conducts program, data and fiscal monitoring and evaluation of service providers annually. Monitoring is conducted to review the previous program year(s). On-site monitoring and/or limited scope reviews may consist of interviews with appropriate staff and reviews of policies, procedures, accounting reports, source documents, and other records as considered necessary pertaining to any or all of WIOA Title IB activities including: a. Fiscal b. Adult c. Youth d. Dislocated Worker (Formula) Dislocated Worker (NEG) e. On-the-Job Training f. Customized Training

g. CT American Job Centers (security access, timely and accurate input at provider level) h. Data Validation i. Eligible Training Provider List j. The One-Stop System including One-Stop Operators, Centers and Service Providers

2. Monitoring may be conducted onsite with additional oversight conducted by telephone, desk reviews of documents and reports, and such other means as deemed necessary by the DOL WIOA administration unit. Members of entities such as One-Stop Operators, State Workforce Investment Board members, or U.S. Department of Labor may accompany onsite monitors.

3. Regular oversight and monitoring of WIOA activities and providers of core, intensive and training services is conducted to ensure compliance with WIOA requirements including: a. Compliance with the uniform administrative requirements described in WIOA Law Title IB Section 181 and USDOL uniform administrative requirements, including the appropriate administrative requirements and applicable cost principles at WIOA Reg. Subpart B for all entities receiving WIOA title IB funds. b. Compliance with applicable laws and regulations in accordance with the State’s monitoring system; c. Determining that expenditures have been made against the cost categories and within the cost limitations specified in the Act and Regulations and in this part; d. Ensuring that established policies are achieving program quality and outcomes meet the objectives of the Act and the WIOA regulations; e. Compliance with the nondiscrimination and equal opportunity requirements of WIOA section 188 and 29 CFR part 37. Requirements for these aspects of the monitoring system are set forth in 29 CFR 37.54(d)(2)(ii); f. Compliance with data collection and reporting system policies and procedures; g. Determining whether or not there is compliance with other provisions of the Act and the WIOA regulations and other applicable laws and regulations; and h. Determining if service providers and contractors have demonstrated substantial compliance with WIOA requirements.

§ 683.420 4. Findings of Noncompliance: If, as a result of financial and compliance audits or otherwise, the Bureau has determined that noncompliance with the uniform administrative requirements found at 29 CFR part 95 or part 97, as appropriate, the requirements referred to in
WIOA Sections 181 and 184, 29 CFR Part 37, or any other substantial violation of WIOA Title IB, the DOL WIOA Administration unit will require corrective action to secure prompt compliance.

5. Failure to Take Corrective Action: If, as a result of financial and compliance audits or otherwise, the DOL WIOA Administration unit has determined a substantial violation of specific provisions of WIOA Title IB, and corrective action has not been taken, the Bureau may: a. provide technical assistance as necessary and appropriate; b. prohibit the use of eligible providers; c. select an alternative entity to provide services; d. withhold one (1) percent of the service provider’s administrative total accrued expenditures to date. If the service provider does not receive administrative funding, one (1) percent of total accrued expenditures to date will be withheld.

B. Monitoring Definitions Area of Concern: When the monitor finds a practice that might lead to non-compliance of law, rule, or policy. This would be used for a questionable practice but not a practice that is definitely out of compliance. In the report the monitor would word this as a matter of technical assistance or chance for improvement. Depending on the concern, the provider may or may not respond to these on the report. The Area of Concern should be followed by a recommendation.

Recommendation: Technical Assistance given in writing to the provider addressing an area of concern.

Compliance Findings: When the monitor finds a practice that appears to be in violation of law, rule, or policy. Any time documentation is missing for enrollment, eligibility, data validation, etc. this would be a compliance finding. The Compliance Finding would be immediately followed by Action Required. The compliance finding will reference the law, regulation, or policy that is not being followed.

Action Required: The action the provider must take to resolve the Compliance Finding.

Questioned Cost: Used when monitors find unallowable purchases and/or incorrect or documentation is missing for activities, services or payments that were made with program dollars. The payment is questioned until the provider has a chance to respond and resolve the discrepancy.

Disallowed Cost: Used when the provider cannot provide the documentation to support a questioned cost that is a clear violation of policy, rule or law. The provider has the responsibility to reimburse the program with non-federal funds.

Providers can collect repayment from the participant, if applicable, but it is at their discretion and the responsibility lies with the provider to repay the cost within the report/response deadline.

Best Practice: Given when the monitor finds good work the provider is doing!

Corrective Action: The action plan that the provider will initiate to resolve their Compliance Findings and/or Areas of Concern within the monitoring time period. This basically means the actions the provider does to bring themselves into compliance.

Formal Corrective Action: This is when a service provider has severe problems with the monitoring and requires additional monitoring for a specific period of time (usually one year) to ensure they are in compliance. Being on Formal Corrective Action requires the provider to outline what happened on the next Request for Proposal.
C. Schedules and Timelines for Monitoring

1. Schedule for monitoring service providers [reserved]

2. Timeline
   - Date set for onsite review: 30 days before review
   - Onsite review is conducted
   - Entrance and Exit Interviews Conducted at the time of the onsite review
   - Report to Service Providers: 60 days after onsite review
   - Corrective Action Plan due: 30 days from date the report was received
   - Accept or Deny Corrective Action Plan: 45 days from date the Corrective Action Plan was received by the State
   - Corrective Action taken: 30 days after approval of corrective action plan
   - Requests to extend corrective action plan are negotiable
   - Follow-up: Within 30 but no more than 120 days after approval of corrective action plan.

D. Evaluation

Evaluation is the measurement of the effectiveness of programs in meeting objectives, program goals and performance standards. Evaluations are intended to promote, establish, implement, and utilize methods for continuously improving workforce activities in order to achieve high-level performance within, and high-level outcomes from the statewide workforce investment system.

CTDOL WIOA Administration unit will also analyze the data collected from the Customer Satisfaction surveys of participants and employers. A report will be written and presented to the SWIB on an annual basis. Other reports as requested from the SWIB will be produced on behalf of the workforce system. From these reports, the SWIB and Bureau will be able to assess how effective the programs are in meeting objectives and goals and recommend any improvements that need to be made.

E. Technical Assistance

Technical assistance and training may be recommended by the CTDOL WIOA Administration unit or requested by the service provider. Technical assistance may be the means of improving program operations, facilitating the implementation of corrective action or providing information. Service providers will not be monitored on the quality or compliance of their programs during technical assistance visits but will be provided direction to improve quality and compliance issues. State program managers may provide technical assistance and training directly or outside sources may be used. Such requests should be coordinated through the appropriate program manager or specialist.

Requests for minor technical assistance may be submitted verbally or in writing. If major assistance or assistance in several areas is requested, the request should be in writing so that staff has sufficient information to decide on the most appropriate form and level of assistance to provide. If several service providers request assistance in related areas, a general training session may be scheduled.

Program managers may schedule technical assistance visits to service providers to provide information or special training, discuss areas of concern, evaluate program operation, or any combination thereof.

Service provider attendance is required at state-sponsored technical assistance sessions.

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

The State provides its policy regarding the transfer of funds between the adult and dislocated worker programs via the draft WIOA policy manual under the TRANSFER AUTHORITY Section as follows:
A local board may transfer, if such a transfer is approved by the Governor, up to and including 100 percent of the funds allocated to the local area under WIOA paragraph (2)(A) or (3), and up to and including 100 percent of the funds allocated to the local area under paragraph (2)(B), for a fiscal year between—

(A) adult employment and training activities; and (B) dislocated worker employment and training activities.

(A) adult employment and training activities; and (B) dislocated worker employment and training activities. This policy provides the procedures for the transfer of funds between adult and dislocated worker programs at the local area. The Connecticut Department of Labor, in governing the transfer of funds, will use the following procedure. 1. The attached transfer of funds request package must be submitted for each request for transfer of funds. All parts must be completed. 2. A transfer of funds request may be submitted for consideration at any time during the life of a particular year’s allocation, as stipulated in the contract.

3. Once the funds are transferred, they are available for expenditure in the receiving funding stream and are subject to all corresponding rules, regulations, and procedures.

4. The transfer for funds request must satisfactorily address all supplemental questions contained in the package. 5. As part of the supplemental requirements, local areas must provide for a minimum 15-day period of comment to the public and area stakeholders before a request is submitted. This can be done through publication of the request in local area newspaper(s).

6. The Connecticut Department of Labor shall approve or disapprove a local area request for transfer within thirty (30) days of receipt of the request and all necessary supporting information, including any inquiry or request for additional information or clarification.

7. Expenditures shall be reported in accordance with CT Department of Labor Memorandum with AP 00-03.

C. YOUTH PROGRAM REQUIREMENTS

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

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

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

Out of School Youth ages 16 to 24 and In School Youth 14–21 that meet specific eligibility requirements, may qualify for the following Workforce Innovation and Opportunity Act services. • Tutoring, study skills training, and instruction leading to completion of secondary school diploma or equivalent • Alternative Secondary school; drop out recovery • Education concurrent with workforce
preparation and training for specific occupation • Comprehensive guidance and counseling services incl. drug and alcohol • Financial literacy • Entrepreneurial skills training • Adult Mentoring • Paid and unpaid work experience (such as internships, apprenticeships, and job shadowing) • Leadership development • Supportive services • Follow–up services • Career exploration; services that provide labor market and employment information about in–demand industries or occupations • Services to help youth transition to postsecondary education and training

CT DOL has issued a policy which incorporates US DOL’s guidance regarding administrative procurement procedures and the extent to which providers of youth services, such as the program design framework component, the ten program elements, and youth services delivered in a One–Stop setting, must be selected. The State of Connecticut adopted all such guidance and directed each area comply with these policies. See TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 9–00 http://www.ctdol.state.ct.us/wia/tegl.pdf The youth policies of the five workforce boards were reviewed in Summer 2015.

The five workforce development boards understand Job Corps to be a viable option and include it on the roster of service providers to whom they refer young people. In addition, nearby CTWorks One–Stop centers provide workshops for Job Corps student employees, introducing them to a variety of job search resources and other services. In addition, state monitoring, file review and data validation evaluate local area youth policy comprehensively. Following program monitoring, best practices and areas for corrective action are identified. CT DOL will also offer technical assistance to the WDBs to assist them in meeting youth performance measures. Related youth policies can be found at: http://www.ctdol.state.ct.us/wia/memos/policy/memos–youth.htm

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

In a previous comment, we discussed Connecticut’s plan to resolve issues between WIOA policy and our state Department of Education policy on school attendance. (See also proposed AP on Youth Policy)

We propose to develop and emphasize career pathways by emphasizing the connection to career ladders as part of an Out of School Youth’s individual service strategy — an educational path along with occupational training for high–demand jobs, as defined by LMI and the LWDB.

For Out of School Youth, engagement, financial literacy, adult mentoring will be critical pieces. In addition, CT DOL will encourage the WDBs and subrecipients to develop plans which pay special attention to services which engage and attract:

• English language learners (working closely with Adult ED/ESL partners and contextualized learning opportunities including IBEST models) • Youth involved with the justice system (working closely with Court Support Services Division and community partners to support reduced recidivism and improved outcomes for such youth) • Homeless, pregnant or parenting or youth (linking youth with housing and child care as available in the community, to stabilize pathways to self–sufficiency) •
Youth with disabilities (working closely with Vocational Rehabilitation partners to serve these youth in more seamless ways)

Performance Indicators for OSY effective July, 2016:


Connecticut seeks to define measurable skill gains in terms of gains on standardized tests for reading, math and ELL assessments; completing part or all of a GED course; earning GED credential; completion of one or more developmental education courses, passing a credit bearing; completing a designated number of higher education credits; objective demonstration of competencies related to work–based training. Again these indicators will be designed to emphasize career pathways.

Connecticut will leverage and align core programs through the CETC and WIOA implementation work groups. WIOA, Adult Education, Wagner Peyser and Vocational Rehab have been working with CETC work groups to create stronger linkages among partners.

A high–quality, comprehensive career pathway system will be developed and implemented that includes multiple entry and exit points that meets learners where they are, provides education, training and support services needed for career advancement, and ensures a skilled workforce that meets Connecticut’s talent needs.

USDOL and other federal administrative entities are expected to provide additional guidance to the states regarding this issue in early 2016. Actions and methods supporting the state’s implementation efforts include: • Unified State Plan • Statewide MOU • WIOA Administrative policy • Ongoing program reviews by the implementation team • New performance oriented data system CT HIRES

3. DESCRIBE HOW THE STATE WILL ENSURE THAT ALL 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2) ARE MADE AVAILABLE AND EFFECTIVELY IMPLEMENTED.*

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

CT DOL will ensure that youth services for both out of school and in–school youth are effectively implemented through contract management and oversight, administrative policy, data validation, monitoring and technical assistance. Our updated policies will prioritize out of school youth; drop out recovery and post–secondary credentials. In anticipation of the WIOA transition and changes in youth policy, our staff reviewed WDB youth services and policies last summer. After these monitoring visits, we provided the WDBs with verbal and written feedback on strengthening their policies and services as well.

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 EDUCATIONAL
CT DOL has a draft policy. An excerpt includes: For youth who require additional assistance to complete an educational program or to secure and hold employment, additional assistance may be defined to include youth who are/have: • Emancipated • Aged out of foster care • Previous dropouts or have been suspended five or more times or have been expelled • Court/agency referrals mandating school attendance • At risk of dropping out of school by a school official • Never held a job • Been fired from a job within the twelve months prior to application (applies to out of school youth); and • Never held a full–time job for more than thirteen consecutive weeks (applies to out of school youth). • Migrant Youth • Incarcerated Parent/Guardian • Behavior Problems at School • Serious emotional, medical or psychological problems; • Chronic Health Conditions including addictions • Family Literacy Problems • Domestic, Sexual Violence or other Trauma Survivor or reside in abusive environment • One or more grade levels below appropriate for age • Repeated at least one secondary grade level • Core grade point average of less than 1.5; • For each year of secondary education, are at least two semester credits behind the rate required to graduate from high school; • Cultural barriers that may be a hindrance to employment • American Indian, Alaska Native or Native Hawaiian • Refugee • Homeless • Eligible to receive free or reduced price lunch; • A foster child on behalf of whom State or local government payments are made • Locally defined “additional assistance”

Under WIOA, local areas may define additional criterion for a youth who “requires additional assistance to complete an educational program or to secure and hold employment” however under WIOA local areas may no longer define local barriers.


Connecticut’s policies on youth are complicated by discrepancies between the state education statutes and WIOA. Connecticut General Statutes, Sec. 10–184 says if a student has withdrawn from high school, he/she is considered an “out of school youth.”

“Not attending school” language has not been defined by our state Department of Education, which challenges our coordination with our adult education partner. What defines “out of school” is whether the youth/family has officially withdrawn in writing or not. Further, Connecticut youth must be 17 or older to withdraw and it requires parent or guardian’s permission. (At the time of written withdrawal, parents/guardians/students MUST be apprised of adult education and other option for child.)

SDE provides transition and supportive services for students with special needs up to age 21. At 18 a student doesn’t need to officially withdraw in writing, but it is the policy of our Education Dept. to require 18 year olds to get a written withdrawal form. (This is because it forces the system to apprise the family that if they have an IEP and withdraw, they lose all entitlements to IEP services. 17 year olds can return to school, and reinstate IEP within 90 days. Those who withdraw from school in writing are only eligible for services under ADA, not other special education services. There are exceptions to this policy for certain students.)
Until our draft policy is adopted and there is a clarification, CT DOL is using these definitions used for purposes of unemployment benefits: "School" means an established institution of vocational, academic or technical instruction or education, other than a college or university. "Regularly enrolled student" means an individual who has completed all forms and processes required to attend a school, college or university and who will attend prescribed classes at the times they are offered.

CT DOL will develop a policy that directs that students who withdraw from high school and submit notification in writing are to be considered “Out of School Youth;” and that participating in adult education is NOT considered to be attending school.

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

AP 11–06 will be updated. It currently states: The U.S. Department of Labor defines “basic skills deficient” as follows: The individual computes or solves problems, reads, writes, or speaks English at or below the eighth grade level or is unable to compute or solve problems, read, write, or speak English at a level necessary to function on the job, in the individual’s family, or in society. For the purpose of WIA administration in Connecticut, “basic skills deficient” is defined as scoring below 236 in reading and/or math on a Connecticut Competency System (CCS) pretest assessment.

Appraisal results (i.e., results from the ESC 130 and/or CCS 50 tools) may not be used to determine basic skills deficiency.

This policy will be modified to state: The U.S. Department of Labor defines “basic skills deficient” as follows:

(A) Who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or

(B) Who is a youth or adult, that the 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.

For the purpose of WIOA administration in Connecticut, “basic skills deficient” is defined as scoring below 236 in reading and/or math on a Connecticut Competency System (CCS) pretest assessment. Appraisal results (i.e., results from the ESC 130 and/or CCS 50 tools) are not considered generally accepted standardized tests for determining basic skills deficiency.

D. SINGLE-AREA STATE REQUIREMENTS

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must also include:
1. ANY COMMENTS FROM THE PUBLIC COMMENT PERIOD THAT REPRESENT DISAGREEMENT WITH THE PLAN. (WIOA SECTION 108(D)(3).)

2. THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS, AS DETERMINED BY THE GOVERNOR, IF DIFFERENT FROM THAT FOR THE STATE. (WIOA SECTION 108(B)(15).)

3. THE TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES, INCLUDING AN IDENTIFICATION OF SUCCESSFUL PROVIDERS OF SUCH ACTIVITIES. (WIOA SECTION 108(B)(9).)

Connecticut is not a single-area state.

E. WAIVER REQUESTS (OPTIONAL)

States wanting to request waivers as part of their Title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:
1. Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the state or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the unified or combined state plan;

2. Describes the actions that the state or local area, as appropriate, has undertaken to remove state or local statutory or regulatory barriers;

3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;

4. Describes how the waiver will align with the department’s policy priorities, such as:
   A. Supporting employer engagement;
   B. Connecting education and training strategies;
   C. Supporting work-based learning;
   D. Improving job and career results, and
   E. Other guidance issued by the department.

5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and

6. Describes the process used to:
   A. Monitor the progress in implementing the waiver;
   B. Provide notice to any local board affected by the waiver;
   C. Provide any local board affected by the waiver an opportunity to comment on the request;
   D. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.
   E. Collect and report information about waiver outcomes in the state’s WIOA annual report.
The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver;

Since the section describing WIOA waiver requests is optional, Connecticut is describing the present status of our waivers. It is anticipated that there will be changes once further guidance is issued. The State Board (CETC) reviews recommendations included in the State Plan and the recommendations made by its Ad Hoc Committees to determine if waivers are necessary to implement changes in the State’s Workforce system. Local areas may also apply for waivers based upon local need.

Our goal is to use waivers to continuously improve the WIOA program in Connecticut. The position of the Office for Workforce Competitiveness (OWC) at the Connecticut Department of Labor positioned the Agency to transform the state’s Workforce Development System. The transition process from WIA to WIOA has involved the memberships of the State Workforce Investment board (SWIB), the OWC and Connecticut's Employment Services Division.

The Connecticut Department of Labor will likely requests extensions for these existing WIA waivers into WIOA waivers for Program Year 2016 (July 1, 2016 to June 30, 2017). Before the request, we will disseminate the proposals to the WDBs for input as well.

1. Waiver of the requirement for a 50 percent employer contribution for customized training, to permit a sliding scale contribution for small and medium sized businesses

Under this waiver, the following sliding scale is permitted based on the size of the business: 1. No less than 10 percent match for employers with 50 or fewer employees, 2. No less than 25 percent match for employers with 51 – 250 employees, and 3. No less than 50 percent match for employers with more than 250 employees.

Regulation/Part of the Law being waived: WIA Section 101(8)(C) The waiver will be monitored and reviewed by: The CT DOL as the state administrator of WIOA, will monitor implementation of this waiver and work with the 5 local workforce boards to assess the range of benefits that have accrued.

Performance measures associated or improved performance: This waiver provides a valuable tool for the Workforce Development Boards (WDBs) in their support of Connecticut’s small businesses and their employees. The sliding scale for employer match provides flexibility for businesses to participate in customized training programs and encourages greater participation from businesses throughout the state.

Connecticut’s struggling economy and lack of confidence in a quick rebound continues to hinder state businesses’ ability to hire workers and increase payroll. However, this has placed more demand on existing worker training and/or re-training workers to remain competitive in the marketplace. This waiver has benefitted Connecticut’s businesses by providing increased access to customized training programs for their existing workers at reduced cost. Affordable, customized training options have also given the state’s businesses a tool to address the possibility of expansion.

Public Comment: Waiver requests will be included in the public notice of Connecticut’s DRAFT State Plan for the current period. Additionally, notice will be posted on the CTDOL website.

2. Waiver to increase the employer reimbursement for on–the–job training (OJT) for small and medium sized businesses
Under this waiver, the following reimbursement amounts are permitted: A. Up to 90 percent reimbursement for employers with 50 or fewer employees, B. Up to 75 percent reimbursement for employers with 51 – 250 employees, and C. Up to 50 percent reimbursement for employers with more than 250 employees.

Regulation/Part of the Law being waived: WIA Section 101(31)(B)/WIOA Section 3(44)(B), TEGL 01–15 indicates this authority will likely continue.

The waiver will be monitored and reviewed by: The CT DOL, as the state administrator of WIOA, will monitor the implementation of this waiver and work with the 5 local workforce boards to assess the range of benefits that have accrued.

Performance measures associated or improved performance: This waiver provides a valuable tool for the Workforce Development Boards (WDBs) in their support of Connecticut’s small businesses and their employees. The sliding scale for employer match provides the flexibility for businesses to participate in the customized training program and encourages greater participation from businesses throughout the state.

This waiver is a necessary tool that will benefit Connecticut's businesses by providing increased access to on-the-job training programs for their existing workers at a reduced cost. Affordable, customized training options have also given the state’s businesses a tool to address the possibility of expansion.

Public Comment: Waiver requests will be included in the public notice of Connecticut's DRAFT State Plan for the current period. Additionally, notice will be posted on the CTDOL website.

3. Waiver to permit the use of a portion of local area formula allocation funds to provide incumbent worker training (IWT)

Regulation/Part of the Law being waived: WIA Section 134(a)/WIOA Section 134 (a), TEGL 01–15 indicates this authority will likely continue.

State and local areas must continue to conduct the required local employment and training activities at WIA Section 134(d), and the State is required to report performance outcomes for any individual served under this waiver in the Workforce Investment Standardized Record Data system (WIASRD). Information regarding individuals served under this waiver must be entered into CT HIRES by local Boards and are subject to local performance measures.

Performance measures associated or improved performance: Under this waiver, local areas are allowed to use up to 10 percent of local Adult and 10 percent of Dislocated Worker funds for IWT only as part of a lay-off aversion strategy. This waiver allows the local Workforce Investment Boards (LWIBs) to leverage limited state funds to develop training services through innovative projects that address the needs of the existing workforce. The waiver also enables the LWDBs to develop services that address a number of different causes that contribute to projected labor shortages in specific occupations, and has created greater participation from local businesses.

Public Comment: Waiver requests will be included in the public notice of Connecticut's DRAFT State Plan for the current period. Additionally, notice will be posted on the CTDOL website.
4. Waiver of the prohibition on use of ITAs for youth — allow flexibility in provision of training services to youth

Regulation/Part of the Law being waived: 20 CFR 664.510. While WIOA rules have not yet been issued, TEGL 01–15 indicates this authority will likely continue.

The CT DOL, as the state administrator of WIOA, will monitor the implementation of this waiver and work with the 5 local workforce boards to assess the range of benefits that have accrued.

Performance measures associated or improved performance: Under this waiver, the LWDBs can use ITAs for older and out-of-school youth program participants. This waiver assists the LWDBs in enhancing service delivery to WIOA older youth by allowing youth who are not on an academic track to focus on employment. Skill training is an important component for older youth particularly if they are going to achieve suitable wages. This is used sporadically however the LWDBs welcome it as another option to strengthen the Youth’s ability to secure employment.

Public Comment: Waiver requests will be included in the public notice of Connecticut’s DRAFT State Plan for the current period. Additionally, notice will be posted on the CTDOL website.

5. Waiver of the requirement for competitive procurement of service providers for up to three youth elements (work experience, support services, and follow-up services) to ensure continuity of youth services

Regulation/Part of the Law being waived: WIA Section 123, WIA Section 117(h)(4)(B)(i), and 20 CFR Part 664.405(4)/ WIOA Section 107 – TEGL 01–15 indicates this authority will likely continue.

The waiver will be monitored and reviewed by: The CT DOL, as the state administrator of WIOA, will monitor the implementation of this waiver and work with the 5 local workforce boards to assess the range of benefits that have accrued.

Performance measures associated or improved performance: Under this waiver, the State was permitted to allow the CTWorks One-Stop Career Centers or partner agencies to directly provide youth program elements. This waiver allowed the State and WDBs to quickly procure youth services needed to administer a summer employment component. The most immediate outcome of this waiver was to increase the number of youth in employment. This waiver also enabled Connecticut and the WDBs to allocate the funds quickly to the participating training providers. This waiver has been an important driver of economic health of the state and had numerous positive impacts on youth, local workforce areas, and businesses.

Public Comment: Waiver requests will be included in the public notice of Connecticut’s DRAFT State Plan for the current period. Additionally, notice will be posted on the CTDOL website.

Additional information about CT DOL waivers can be found at:

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**TITLE I-B ASSURANCES**

The State Plan must include assurances that:
1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient; Yes

2. The state has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist; Yes

3. The state established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members. Yes

4. The state established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2). Yes

5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership. Yes

6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the state consults with chief elected officials in local areas throughout the state in determining the distributions. Yes

7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7). Yes

8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan. Yes

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

10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report. Yes

11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3); Yes
All program-specific requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

A. EMPLOYMENT SERVICE PROFESSIONAL STAFF DEVELOPMENT.

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

As funding allows, the Connecticut Department of Labor (CTDOL) will continue to promote the professional development of its staff, leveraging state, agency, and, as applicable, federal grant funds to enhance the skills of its workforce. CTDOL will continue to pursue professional résumé writer certification for all appropriate American Job Center staff utilizing agency staff for training and test preparation. Employment Service staff, including Business Services staff, will continue to have the opportunity to attend annual workforce development conferences such as the CT Learns and Works Conference and the Conference on Serving Adults with Disabilities. To build capacity, CTDOL will train American Job Center staff to facilitate a variety of job readiness workshops. In addition, in–service training courses offered each fall and spring by the Department of Administrative Services may be made available to Employment Service staff to enhance computer, communication, writing, public speaking, presentation and supervisory skills.

2. DESCRIBE STRATEGIES DEVELOPED TO SUPPORT TRAINING AND AWARENESS ACROSS CORE PROGRAMS AND THE UNEMPLOYMENT INSURANCE PROGRAM, AND THE TRAINING PROVIDED FOR EMPLOYMENT SERVICES AND WIOA STAFF ON IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION.

The agency will increase capacity and staff knowledge through cross–agency staff training consistent with Connecticut’s coordinated workforce system efforts to ensure AJC customers are properly referred to appropriate services. CTDOL Adjudications and Program Policy staff will provide training to Employment Services and WIOA staff regarding the identification and referral of UI eligibility issues. This training will include the use of curriculum and other materials developed by, or in consultation with, UI staff, and regular meetings and roundtable discussions attended by UI, ES and WIOA staff.

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.

A full–time Unemployment Insurance (UI) expert will be stationed at the front desk of the Hartford, Waterbury, Bridgeport, New London and Hamden Job American Job Centers to assist customers with unemployment– related inquiries. This assistance may include processing continued claims; releasing payments when appropriate; processing address changes; assisting claimants with filing appeals; providing identity verifications, printouts or status letters; and supplying information on the
Shared Work program and Rapid Response services. The UI experts will also provide handouts or desk aids to customers with questions that can be answered via the web (www.filectui.com) and inform claimants of other services provided by the American Job Centers. These UI experts can also grant requests for a reasonable accommodation by taking initial and/or additional unemployment claims for claimants that experience physical and/or cognitive limitations that make it difficult to file their claims over the telephone or on the internet. UI experts in the American Job Centers will also have access to Language Line services to accommodate customers with limited English proficiency.

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

Connecticut’s strategy to provide reemployment assistance to UI claimants and other unemployed individuals is multi–faceted. First, CTDOL implemented the Unemployment Insurance (UI) Reemployment and Eligibility Assessment (REA) program in October 2015. UI REA helps meet the reemployment needs of UI claimants by providing an entry point to the full array of services available at the American Job Centers. Recent studies conclude that REA has helped other states accelerate the time it takes the unemployed to return to the workforce. Connecticut’s UI REA program, which targets claimants with the highest weekly benefit rates, will serve 7,500 during the program’s first year, October 13, 2015 – September 30, 2016. UI REA appointments are conducted in the Bridgeport, Hartford, Hamden, New London, and Waterbury offices. All claimants selected to participate are required to report in–person to receive the following reemployment–related services. • Provision of labor market and career information specific to the claimant’s needs; • Registration with the State’s job bank; • Orientation to AJC services; • Development and review of an individualized reemployment plan that includes work search activities, accessing services provided through an AJC or using self–service tools, and/or approved training; and • Referral to at least one reemployment service and/or training based on an assessment of the claimant’s most critical need identified in the individualized reemployment plan. Enhanced Reemployment Services Program CTDOL staff will continue to serve UI claimants under the Enhanced Reemployment Services (ERS) program, which identifies UI claimants most likely to exhaust their benefits, claimants who are unlikely to return to their previous occupations, and are in need of job search assistance services to make a successful transition to a new job. In Program Year 2014 – 2015, orientation sessions were conducted for 7,434 ERS participants. Sessions included the provision of labor market information, career guidance, information about CT.jobs (the former state job bank), an overview of American Job Center services, and details on UI benefit rights and responsibilities. Many ERS participants also benefited from direct, individual employment services and training to facilitate their return to work, resulting in 20,803 additional reemployment services provided.

The Unemployment Insurance Reemployment Services and Eligibility Assessment (RESEA) Program In October of 2016, CTDOL will transition from UI REA to the Unemployment Insurance Reemployment Services and Eligibility Assessment (RESEA) program, a similar program for a different target population. RESEA will serve Unemployment Compensation for Ex–service members (UCX) claimants and other claimants who are determined most likely to exhaust their UI benefits. As such, the ERS program will be discontinued. Under WIOA, the UI program is a vital workforce system service and mandatory One–Stop partner in the American Job Centers. UI claimants and other unemployed individuals will continue to be priority customers. CTDOL will provide reemployment services to these individuals by leveraging partner programs to meet their needs and expedite their return to work.
D. DESCRIBE HOW THE STATE WILL USE W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS APPROPRIATE, INCLUDING THE FOLLOWING:

1. COORDINATION OF AND PROVISION OF LABOR EXCHANGE SERVICES FOR UI CLAIMANTS AS REQUIRED BY THE WAGNER-PEYSER ACT;

CTDOL mails a Claimant’s Guide to Unemployment Benefits to all initial unemployment claim filers. This booklet contains all necessary information related to a person’s eligibility for unemployment benefits as well as a listing of the American Job Centers throughout Connecticut and information about the employment services they provide to job seekers. As a result of filing for Unemployment Insurance, UI claimants are registered with the State’s employment service in the form of a registration in CTHires, the state’s web–based workforce development system that provides case management and labor exchange services and the state job bank. Claimants will receive a welcome email from CTHires after filing which explains the services available and encourages them to utilize the system for their job search. CTDOL administers the work test for UI claimants through the UI REA program and RESEA programs. All claimants selected to participate will report to an American Job Center for a review of their UI eligibility and efforts to find work. Any claimant determined to have an eligibility issue or insufficient work search efforts will have a stop entered on his or her unemployment claim and be referred to the CTDOL Adjudications unit for action. The process for referring claimants to Adjudications is already in place, as is the feedback loop, which includes advising Employment Service staff about the outcome of the referral and the need for rescheduling. All claimants who attend the initial one–on–one REA appointment will receive a customized reemployment plan, jointly developed with the REA/RESEA representative, and be required to participate in at least one additional mandatory employment service activity. Services include referrals to employment readiness workshops, résumé critiques, career counseling, WIOA orientation sessions, or any other service available in the American Job Center.

State agency merit–based public employees will continue to provide Wagner–Peyser Act funded labor exchange activities in accordance with Department of Labor regulations at the American Job Centers in Hartford, Bridgeport, Hamden, Waterbury, New London and Danielson. These services include job readiness workshops on topics such as Job Search Strategies, Résumé Preparation and Interviewing Techniques; one–on–one career counseling, résumé critiques; employer recruitments; job readiness assessments; and Career Center services. In the Career Centers located in the American Job Centers, jobseekers will be able to work on their résumés and cover letters, complete online job applications, research companies, review job postings and conduct any other business related to their job search. They will have access to copy machines, fax machines, free postage for mailing résumés and applications to employers and, most importantly, in–person support from CTDOL and Workforce Development Board contractor staff who will provide whatever guidance and support might be needed. Career Center customers with disabilities will have access to accessible technology, such as large screen computer monitors and visual magnifiers, TTY machines, and computer keyboards with enhanced lettering and any other reasonable accommodation the customer might need. Labor exchange services detailed above will be available to all jobseekers at any time regardless of the order in which they are seeking services. All American Job Centers will have a process in–place that allows staff to refer customers to education and training programs as well as other resources and supportive services. Some referrals will be made “in–house” to other partner agencies under the roof of the American Job Center while others may be to organizations that are located in separate venues. Trade Act clients will be co–enrolled into WIOA as a standard operating procedure.
CTDOL will continue to deploy a team of Business Services Specialists across Connecticut whose sole focus is working with employers. Business Services Specialists identify employers interested in scheduling recruitment events in the American Job Centers and coordinate those events around the state. They ask employers to post job openings into the new CTHires system to generate employment opportunities for UI claimants. Business Services Specialists also write Incumbent Worker Training contracts with employers, provide business consultations to identify the company’s needs, promote tax credit and wage reimbursement programs such as WOTC and STEP–UP, and provide customized labor market and UI information. UI claimants typically benefit from these initiatives.

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

CTDOL mails a Claimant’s Guide to Unemployment Benefits to all initial unemployment claim filers. This booklet contains all necessary information related to a person’s eligibility for unemployment benefits as well as a listing of the American Job Centers throughout Connecticut and information about the employment services they provide to job seekers. As a result of filing for Unemployment Insurance, UI claimants are registered with the State’s employment service in the form of a registration in CTHires, the state’s web–based workforce development system that provides case management and labor exchange services and the state job bank. Claimants will receive a welcome email from CTHires after filing which explains the services available and encourages them to utilize the system for their job search. CTDOL administers the work test for UI claimants through the UI REA program and RESEA programs. All claimants selected to participate will report to an American Job Center for a review of their UI eligibility and efforts to find work. Any claimant determined to have an eligibility issue or insufficient work search efforts will have a stop entered on his or her unemployment claim and be referred to the CTDOL Adjudications unit for action. The process for referring claimants to Adjudications is already in place, as is the feedback loop, which includes advising Employment Service staff about the outcome of the referral and the need for rescheduling. All claimants who attend the initial one–on–one REA appointment will receive a customized reemployment plan, jointly developed with the REA/RESEA representative, and be required to participate in at least one additional mandatory employment service activity. Services include referrals to employment readiness workshops, résumé critiques, career counseling, WIOA orientation sessions, or any other service available in the American Job Center.

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have a process in–place that allows staff to refer customers to education and training programs as well as other resources and supportive services. Some referrals will be made “in–house” to other partner agencies under the roof of the American Job Center while others may be to organizations that are located in separate venues. Trade Act clients will be co–enrolled into WIOA as a standard operating procedure.

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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

CTDOL mails a Claimant’s Guide to Unemployment Benefits to all initial unemployment claim filers. This booklet contains all necessary information related to a person’s eligibility for unemployment benefits as well as a listing of the American Job Centers throughout Connecticut and information about the employment services they provide to job seekers. As a result of filing for Unemployment Insurance, UI claimants are registered with the State’s employment service in the form of a registration in CTHires, the state’s web–based workforce development system that provides case management and labor exchange services and the state job bank. Claimants will receive a welcome email from CTHires after filing which explains the services available and encourages them to utilize the system for their job search. CTDOL administers the work test for UI claimants through the UI REA program and RESEA programs. All claimants selected to participate will report to an American Job Center for a review of their UI eligibility and efforts to find work. Any claimant determined to have an eligibility issue or insufficient work search efforts will have a stop entered on his or her unemployment claim and be referred to the CTDOL Adjudications unit for action. The process for referring claimants to Adjudications is already in place, as is the feedback loop, which includes advising Employment Service staff about the outcome of the referral and the need for rescheduling. All claimants who attend the initial one–on–one REA appointment will receive a customized reemployment plan, jointly developed with the REA/RESEA representative, and be required to participate in at least one additional mandatory employment service activity. Services include referrals to employment readiness workshops, résumé critiques, career counseling, WIOA orientation sessions, or any other service available in the American Job Center.

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related to their job search. They will have access to copy machines, fax machines, free postage for mailing résumés and applications to employers and, most importantly, in–person support from CTDOL and Workforce Development Board contractor staff who will provide whatever guidance and support might be needed. Career Center customers with disabilities will have access to accessible technology, such as large screen computer monitors and visual magnifiers, TTY machines, and computer keyboards with enhanced lettering and any other reasonable accommodation the customer might need. Labor exchange services detailed above will be available to all jobseekers at any time regardless of the order in which they are seeking services. All American Job Centers will have a process in–place that allows staff to refer customers to education and training programs as well as other resources and supportive services. Some referrals will be made “in–house” to other partner agencies under the roof of the American Job Center while others may be to organizations that are located in separate venues. Trade Act clients will be co–enrolled into WIOA as a standard operating procedure.

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

CTDOL mails a Claimant’s Guide to Unemployment Benefits to all initial unemployment claim filers. This booklet contains all necessary information related to a person’s eligibility for unemployment benefits as well as a listing of the American Job Centers throughout Connecticut and information about the employment services they provide to job seekers. As a result of filing for Unemployment Insurance, UI claimants are registered with the State’s employment service in the form of a registration in CTHires, the state’s web–based workforce development system that provides case management and labor exchange services and the state job bank. Claimants will receive a welcome email from CTHires after filing which explains the services available and encourages them to utilize the system for their job search. CTDOL administers the work test for UI claimants through the UI REA program and RESEA programs. All claimants selected to participate will report to an American Job Center for a review of their UI eligibility and efforts to find work. Any claimant determined to have an eligibility issue or insufficient work search efforts will have a stop entered on his or her unemployment claim and be referred to the CTDOL Adjudications unit for action. The process for referring claimants to Adjudications is already in place, as is the feedback loop, which includes advising Employment Service staff about the outcome of the referral and the need for rescheduling. All claimants who attend the initial one–on–one REA appointment will receive a customized reemployment plan, jointly developed with the REA/RESEA representative, and be required to participate in at least one additional mandatory employment service activity. Services include referrals to employment readiness workshops, résumé critiques, career counseling, WIOA orientation sessions, or any other service available in the American Job Center.

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

1. ASSESSMENT OF NEED

Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

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

Review of the previous year’s MSFW activity in the State

Major Crop Activity in Connecticut PY 2014 Crop Months of Heavy Agricultural Activity Primary Region Tobacco (Shade & Broadleaf) June through September North Central Fruit (Apples, Peaches, Pears) July through October Central Nursery February through July South Central Greenhouse March – June, and October - December South Central

Review of Previous Year’s MSFW Activity in Connecticut (Estimates from Connecticut’s Labor Market Information) PY 2014 Crop MSFWs Employed Labor Shortage Tobacco (Shade & Broadleaf) 1000 Yes Fruit (Apples, Peaches, Pears) 350 Yes Nursery 550 Yes Greenhouse 800 Yes Other 760 Yes

Crop activity and the projected number of MSFWs in each crop activity are projected to remain the same for PY 2015:

Estimated Major Crop Activity in Connecticut PY 2015 Crop Months of Heavy Agricultural Activity Primary Region Tobacco (Shade & Broadleaf) June through September North Central Fruit (Apples, Peaches, Pears) July through October Central Nursery February through July South Central Greenhouse March – June, and October - December South Central

Estimated MSFW Activity in Connecticut (Estimates from Connecticut’s Labor Market Information) PY 2015 Crop MSFWs Employed Labor Shortage Tobacco (Shade & Broadleaf) 1000 Yes Fruit (Apples, Peaches, Pears) 350 Yes Nursery 550 Yes Greenhouse 800 Yes Other 760 Yes

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);

Currently all employers utilizing Connecticut’s Agricultural Recruitment System (ARS) are participants of the H-2A program. The larger operations taking part in the H-2A program employ a combination of foreign workers, migrant workers, and local seasonal workers, with the latter being the largest contingent of this population. Smaller participants of the H-2A program almost exclusively employ foreign workers. All employers utilizing the ARS agree that the demographics of the former “U.S. worker” have drastically changed over time as the majority of the local seasonal workforce is comprised of immigrants.

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.

Tobacco crops in Connecticut have experienced a steady decline in recent times, due in part to foreign competition from Central America, whose production costs are lower than those found here.

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.

Connecticut’s Labor Market Information and CTDOL outreach efforts estimates there were 3,460 MSFWs in PY2014. Approximately 70 were migrant workers. The majority of the farm workers in Connecticut are from Mexico, Jamaica, Puerto Rico, Central America, and Haiti. Many farm workers including MSFWs in Connecticut experience challenges with language barriers, lack of education, and insufficient knowledge of worker’s rights, health care options, legal status, and self-sustainability.

2. OUTREACH ACTIVITIES

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

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

The SMA will continue to explain to farmworkers the services available to them at local one-stop centers and other entities through his farm visits, as well as his visits to meetings held at New England Farm Workers Council (NEFWC.)

To augment CTDOL’s outreach efforts, the SMA continues a cooperative agreement with the NEFWC, in an effort to integrate the employment and training services of both agencies and avoid the duplication of services to MSFWs. This partnership also enhances CTDOL’s ability to achieve maximum penetration into the farm worker population by reaching seasonal as well as migrant workers. The SMA has also developed additional strategic partnerships with community based organizations to maximize resources and provide support services to MSFWs as well as agricultural employers.

Written and oral presentations to MSFWs, in both Spanish and English, at their living quarters and in common gathering areas will continue to be delivered by the SMA. The information presented will include the following: ? Agricultural and non-agricultural job openings ? Training options ? Support services (Statewide Legal Services of CT, Migrant Health programs) ? Vocational testing ? Career counseling ? Job development ? Information on the Job Service Complaint System ? Farm worker rights (Federal and State Law, employment related protections) ? Terms and conditions of employment ? Unemployment Compensation Insurance Information ? Services provided by the New England Farm Workers’ Council (NEFWC)

The SMA will also provide workers with wallet-sized cards that include his contact information as well as the names and phone numbers of other organizations offering support services, such as U.S. Wage & Hour, ConnectiCOSH (CT OSHA), NEFWC, Statewide Legal Services, and a number of
Community Health Centers. Other outreach material that may be distributed to the workers includes information on Migrant Clinics (administered by the CT River Valley Farmworkers’ Health Program), pamphlets on a number of CTDOL’s own programs/services, Unemployment Compensation Filing, and the addresses and phone numbers of all of the American Job Centers throughout the state.

The SMA also provides MSFWs with information on seasonal or short-term non-agricultural job openings, as well as agricultural opportunities in other states, that they may transition to when their agricultural contract has ended.

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.

Connecticut is currently not classified as a significant MSFW state and has its SMA conduct all outreach activities and efforts. The SMA had attended various training conferences to stay up to date on best practices and to disseminate information on services available through the One–Stop Career Centers, the Job Services Complaint System, and information on the entities serving MSFWs in Connecticut. The SMA also provides information on farmworker rights.

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.

Since the SMA handles all the outreach activities, he has established a relationship with both the CTDOL UI division as well as the USDOL Wage and Hour unit. This collaboration with USDOL Wage and Hour staff and participation in the Winter Connecticut Nursery & Landscaping Association field day, introduces him to agricultural employers and helps establish a pathway for future farm visits. These farm visits assist agricultural employers as well as farmworkers in understanding unemployment eligibility and other labor laws.

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.

Only the SMA provides outreach, training and other materials on farmworkers and agricultural employers for those staff members that are in the local offices or work with assisting farmworkers with UI eligibility. These materials can be found on the CTDOL internal network site for all CTDOL staff to access.
E. COORDINATING OUTREACH EFFORTS WITH NFJP GRANTEES AS WELL AS WITH PUBLIC AND PRIVATE COMMUNITY SERVICE AGENCIES AND MSFW GROUPS.

In addition to collaborating and working closely with our NFJP grantee, the SMA also has established relationships with various entities across the region such as:

? Partnerships with community based organizations such as University of Connecticut School of Medicine, Connecticut River Valley Farmworker’s Health Program (CRVFHP), Statewide Legal Services of CT, and Community Health Service providers; ? Distribution of informational brochures and posters on Pesticide Safety and Heat Stroke Prevention to all growers participating in the H–2A program; ? Partnering with the NEFWC to provide other support services to local farm workers in need; ? Presentation to students at the University of Connecticut on a field trip for a class titled “Migrant Workers In Connecticut”; ? Participation in the University of Connecticut Migrant Farm Worker Clinic Symposium by presenting information about MSFWs to medical students who visit farms and conduct free medical screenings for farm workers; and ? Presenting information on MSPA and H–2A regulations to agricultural employers.

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

Describe the State agency's proposed strategies for:

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

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

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

American Job Centers (AJCs) offer integrated and universally accessible employment services that effectively and efficiently meet the needs of all customers, including MSFWs. Through existing partnerships in the AJCs, MSFWs and agricultural employers have access to the following services through a single delivery system which include: Wagner–Peyser labor exchange services such as recruitment assistance, career counseling, vocational testing, veterans employment and training services, resume writing, job search assistance, reemployment work–shops, and job referrals. Other American Job Center Network programs, agencies and services include Adult, Dislocated Worker and Youth activities under WIOA, Adult Education, Apprenticeship Training, Vocational Rehabilitation Training under DORS (Department of Rehabilitation Services) and BESB (Bureau of Education and Services for the Blind), Unemployment Insurance, Jobs First Employment Services, and referrals to supportive services. This universal access to career services guarantees barrier–free admission to all seekers of employment and training services, including individuals with disabilities. Many of CTDOL’s partners working under the American Job Center Network are co–located in our AJCs, which allows for a seamless delivery of services to job seekers. Once registered into CTDOL’s database, all information and referrals are maintained electronically.
Training programs available through the American Job Centers are comprehensive and flexible in meeting the diverse needs of Connecticut’s population. This allows job seekers with varying levels of education and experience the opportunity to upgrade their skills in order to meet the competitive needs of employers.

Staff encourages non–English speaking customers to take advantage of the cost–free ESL classes offered through Adult Education or CTDOL’s WIOA Section 167 Grantee. This is a critical component of promoting life–long learning as well as developing the basic skills needed to secure employment and pursue career growth.

Staff in the American Job Centers have been trained in the proper identification and coding of MSFWs and are well educated on the multiple barriers of employment this population may encounter. The SMA will continue on–site monitoring of the AJCs to ensure compliance with the Job Service regulations, and will offer technical assistance to staff as needed.

ii. How the State serves agricultural employers and how it intends to improve such services.

The SMA maintains frequent contact with growers in the H–2A program in an effort to respond quickly to their labor needs.

The SMA will continue to reinforce positive relationships with farm workers, agricultural employers, and other non–profit organizations while conducting outreach activities. During the next year CTDOL plans to continue outreach to local workers as a means of informing them of the full range of services offered in the American Job Centers Network.

The SMA maintains frequent contact with growers in the H–2A program in an effort to respond quickly to their labor needs.

In PY 2015, CTDOL will continue to offer the following services to agricultural employers and MSFWs: Assistance with the placement of local and interstate job orders ? Assistance in the recruitment of qualified workers ? Dissemination of information on, and referral to organizations that assist MSFWs including New England Farm Workers’ Council, CT Migrant Health Network, CT River Valley Farm workers Health Program, ConnectiCOSH, University of Connecticut Medical School, Statewide Legal Services of CT, and Board of Education Migratory Program ? Mediation and Interpretation services ? Complaint assistance ? Technical assistance to ensure that housing requirements meet Federal standards ? As needed, assist in making appointments for individual MSFWs or members of their family with appropriate agencies ? Technical assistance on compliance with employment services regulations and all other Federal and State laws

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

CTDOL will continue to rely on its SMA to distribute employment service complaint system material and information to farmworkers and advocacy groups through his farm visits and networking activities.
(C) MARKETING THE AGRICULTURAL RECRUITMENT SYSTEM TO AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH PUBLICITY.

The CTDOL will continue to promote recruitment assistance, available through the Department of Labor in outreach contacts, to agricultural employers throughout the state. CTDOL’s Alien Labor Certification staff, in collaboration with the State Monitor Advocate (SMA), continues a screening process for job seekers interested in agricultural job openings. This screening process not only ensures that qualified applicants are referred but also allows the prospective applicant to gain a thorough understanding of the terms and conditions of each job opening. Carefully matching job seekers with prospective employers proves to be instrumental in establishing credibility with our agricultural employers.

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).

As stated earlier, we have established a close working relationship with our NFJP grantee, the New England Farm Workers Council (NEFWC), the SMA also has established relationships with various entities across the region such as: community based organizations such as University of Connecticut School of Medicine, Connecticut River Valley Farmworker’s Health Program (CRVFHP), Statewide Legal Services of CT, and Community Health Service providers. We continue to collaborate in outreach efforts as well as educational and training opportunities.

As such, CTDOL has also started dialog with those entities that serve the farmworker population in bordering states as well as supply states to develop relationships. This is important since many of these farmworkers cross state lines. In the next four years, it is expected that we will continue to work together and refer MSFWs and agricultural employers appropriately to each entity in order to coordinate efforts for success in the program. The SMA has also established pathways for Connecticut MSFWs to transition to other states after the term of the contract in Connecticut is completed. This effort of developing relationships with other SMAs will continue as we serve the MSFWs and agricultural employers.

(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.

The WIOA section 167 NFJP Grantee, the New England Farm Worker’s Council (NEFWC) has been afforded the opportunity to review and comment on the State Agricultural Outreach Plan. No comments or additional recommendations were received.

(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.

CTDOL is committed to achieving full compliance with the federally mandated minimum equity indicator requirements for service to MSFWs. Connecticut has achieved federal mandated standards for the MSFW programs.

(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.

PY 2014 Plan versus PY 2014 Actual

Comparison Chart – Program Year Goal Actual +/- 1 Number of MSFWs contacts by ES staff 400 512 +112 2 Number of MSFWs contacts by 167 grantee 216 411 +195 3 Number of MSFWs employers contacted for obtaining Job orders 65 36 –29 4 Number of job orders cleared 75 58 –17 5 Number of job orders on which field checks were conducted 28 25 –3 6 Total number of MSFW formal complaints received 0 0

In addition, the CTDOL has also recorded a 55% increase of MSFWs receiving career guidance, job development and staff assisted services from PY 2013 to PY 2014. Due to shifts in agricultural trends in Connecticut, we did not receive the amount of job orders we had anticipated. According to the annual Agricultural Wage Survey conducted in Connecticut, the Agricultural employers utilized more family workers instead of MSFWs in PY 2014. CTDOL’s PY 2015 goal is to reach 400 MSFWs. The majority of contacts with MSFWs will be conducted between June and October. The SMA will conduct visits to agricultural employers between November and May for recruiting assistance.

The level of Wagner–Peyser funding in Connecticut, specific to outreach activity, has not changed. CTDOL will continue to provide services and outreach to MSFWs at the same levels as previous years.
(E) STATE MONITOR ADVOCATE

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

The SMA has been afforded the opportunity to review and comment on the State Agricultural Outreach Plan.

F. WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

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

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

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

4. State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations. Yes
The State Plan must include a description of the following as it pertains to Adult Education and Literacy programs under Title II, the Adult Education and Family Literacy Act (AEFLA).

A. ALIGNING OF CONTENT STANDARDS

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

With adoption of the Common Core State Standards in Connecticut, the new GED test and the new web-based National External Diploma Program, CSDE recognized the need to support a set of standards relevant to adult learners. Connecticut adopted the College and Career Readiness Standards for Adult Education released by the United States Department of Education Office of Career and Technical and Adult Education. These content standards align closely with the Common Core State Standards in Connecticut. Connecticut applied to OCTAE and was selected in December 2014 for participation in the College and Career Readiness Standards—in–Action project. Trainers participated in two workshops in Washington, DC, to be trained in the statewide implementation of standards. CT has a policy that all adult education providers have their ABE/GED and some ESL teachers trained in using the CCRS in their curriculum. Full implementation will begin no later than July 1, 2017. Beginning in the fall of 2015 state educators have received intensive Advanced Level College and Career Readiness for Adult Education standards implementation training. This training and technical assistance will enable the state to continue implementation of CCR standards and prepare for total alignment by July 1, 2017 by reaching all programs, adult education staff and students.

B. LOCAL ACTIVITIES

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

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

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

The State of Connecticut will award multi-year grants to eligible providers through an RFP process to enable providers to develop, implement and improve adult education and literacy activities. To ensure direct and equitable access for all eligible providers, the CSDE will publish a Notice of Availability in all major newspapers throughout the state and post the notice on the web page of the State Department of Education as well as the web page of our core partners, Department of Rehabilitation Services and the Department of Labor. The RFP will be e-mailed to all LEA, higher education institutions, to a master list of current and past providers which includes: community-based organizations, regional educational service centers (RESC), housing authorities, volunteer organizations, DOC, other correctional facilities and institutions; and to all providers and WDBs. A bidder’s conference will be publicly advertised with the Notice of Availability and will be held at a central location to provide answers to questions regarding appropriateness of proposed projects and application procedures.

Agencies that are eligible for funding through the CSDE provided they have demonstrated effectiveness may include: • local educational agencies; • community-based organizations or faith-based organizations; • volunteer literacy organizations; • institutions of higher education; • public or private nonprofit agencies; • libraries; • public housing authorities; • other nonprofit institutions that have the ability to provide adult education and literacy activities to eligible individuals; • a consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described above; and • a partnership between an employer and an entity described above.

Grants will be awarded to agencies that have demonstrated effectiveness in providing adult education and literacy activities to individuals who: • have attained 17 years of age; • are not enrolled or required to be enrolled in secondary school under Connecticut state law; and • are basic skills deficient; • do not have a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education; or • are English language learners (ELL).

Local grants will be distributed based on the ability to meet the requirements of the Adult Education and Family Literacy Act (AEFLA) purposes outlined in WIOA and have demonstrated effectiveness: (1) Assist adults to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency; (2) Assist adults who are parents or family members become a full partner in the education development of their children; (3) Assist adults in completing high school; (4) Promote transitions from adult education to postsecondary education and training through career pathways; (5) Assist immigrants and English language learners to improve reading, writing, math, speaking, and comprehending the English language and acquire understanding of American government, individual freedom and responsibilities of citizenship.

The CSDE will make funding available to each of the five Service Delivery Areas (SDA) in Connecticut. The department, in conjunction with each WDB, will assess SDA needs and WDB goals. Eligible providers will select the appropriate priority area when drafting and submitting the RFP to the CSDE.

The RFP will be published for at least six–weeks to allow sufficient time between RFP distribution and proposal submission to the CSDE. RFPs will be evaluated by a review team comprised of interagency staff and experts in each priority area. Interagency participants will include representatives of the CSDE, the WDB and One Stop and Vocational Rehab partners. The review team will evaluate each proposal using a standardized evaluation form based on required federal,
state and regional criteria published in the RFP (including the considerations listed in WIOA, Title II, Section 232).

An internal edit check will be conducted by CSDE staff to ensure compliance with the requirements of Title II of WIOA, all applicable laws and RFP criteria.

The CSDE will use the following process to distribute funds to approved applicants: • not less than 82.5 percent of the grant funds shall be used to award grants and contacts under Section 231 and to carry out Section 225 (Programs for Corrections Education and Other Institutionalized Individuals); not more than 20 percent of such amount shall be available to carry out Section 225; • not more than 12.5 percent of the grant funds shall be used to carry out State Leadership activities under Section 223; and • not more than 5 percent of the grant funds, or $85,000, whichever is greater, shall be used for administrative expenses of the eligible agency. Using the evaluation criteria published in the RFP, proposal reviews will involve a standardized evaluation process which includes the following items: the eligible provider’s response to RFP requirements; the accuracy of the itemized budget in meeting line item limits and definitions; and the considerations listed in WIOA, Title II, Section 232. The weight of each consideration in the evaluation process will be defined in the RFP. Evidence required to support each consideration listed below has been defined and is printed in Italics with the corresponding consideration.

All allowable costs for the federally funded Adult Basic Education program are defined in the Office of Management and Budget (OMB) Circular A–87. This document will be used to determine reasonableness, allowability and allocability of costs. All costs must be supported by source documentation.

Using the evaluation criteria published in the RFP, proposal reviews will involve a standardized evaluation process which includes the following items: the eligible provider’s response to RFP requirements; the accuracy of the itemized budget in meeting line item limits and definitions; the provision of adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster; and the considerations listed in WIOA, Title II, Section 231 (e) of WIOA (LISTED BELOW). The weight of each consideration in the evaluation process will be defined in the RFP. Evidence required to support each consideration listed below has been defined and is printed within parentheses with the corresponding consideration.

The assessment of each grant application will involve an intense evaluation of the ability of the eligible provider to meet the literacy needs of the area and to comply with the expectations and statutes described within WIOA. The review process and scoring rubric will consider the following 13 considerations:

Considerations:

1. The degree to which the eligible provider would be responsive to:

A. regional needs as identified in the local plan under WIOA, Title II, Section 108 (as evidenced by a description of regional needs and how the applicant will be responsive to those needs); and

B. serving individuals in the community who were identified as most in need of adult education and literacy activities, including individuals with low literacy skills or who are English language learners
(as evidenced by an objective statement of need accompanied by a recruitment and retention plan which targets these individuals).

2. The ability of the eligible provider to serve eligible individuals with disabilities, including eligible individuals with learning disabilities (as evidenced by an objective statement of need accompanied by a recruitment and retention plan which targets these individuals).

3. Past effectiveness of the eligible provider in improving the literacy of eligible individuals to meet state-adjusted levels of performance for the primary indicators of performance described in WIOA, Title II, Section 116, especially with respect to eligible individuals with low literacy (as evidenced by meeting or exceeding performance measures based on documentation from CARS and annual reviews for previously funded providers and as evidenced by comparable objective performance measures which demonstrate successful student outcomes for new eligible providers).

4. The extent to which the eligible provider demonstrates alignment between proposed activities and services and the strategy and goals of the local plan under WIOA, Title II, Section 108, as well as the activities and services of the one-stop partners (as evidenced by description of proposed activities and strategies and goals and how the provider plans to align them).

5. Whether the eligible provider’s program is of sufficient intensity and quality; based on the most rigorous research available so that participants achieve substantial learning gains; and uses instructional practices that include the essential components of reading instruction (as evidenced by a program design suitable to achieve applicable performance measures – appropriateness of program design may be demonstrated by past performance of successful outcomes or documentation of a similar program design and associated outcomes).

6. Whether the eligible provider’s activities, including whether reading, writing, speaking, mathematics, and English language acquisition instruction delivered by the eligible provider, are based on best practices derived from the most rigorous research available and appropriate, including scientifically valid research and effective educational practice (as evidenced by program design and/or curriculum).

7. Whether the eligible provider’s activities effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and system lead to improved performance (as evidenced by program design and/or curriculum and the accessibility of hardware and software applications as appropriate).

8. Whether the eligible provider’s activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship (as evidenced by program design and/or curriculum which focus on skills needed for postsecondary education and training, the workplace, and citizenship).

9. Whether the eligible provider’s activities are delivered by well-trained instructors, counselors, and
administrators who meet any minimum qualifications established by the State, where applicable, and who have access to high quality professional development, including through electronic means (as evidenced by appropriate degrees, certifications, and trainings).

10. Whether the eligible provider’s activities coordinate with other available education, training, and social service resources in the community, such as by establishing strong links with elementary schools and secondary schools, postsecondary educational institutions, institutions of higher education, local WDBs, One-Stop Centers, job training programs, social service agencies, business, industry, labor organizations, community based organizations, nonprofit organizations, and intermediaries, for the development of career pathways (as evidenced by formal collaborations and the commitment of the provider to assess and address the literacy and non-literate support services of participants).

11. Whether the eligible provider’s activities offer flexible schedules and coordination with federal, state, and local support services (such as child care, transportation, mental health services, and career planning) that are necessary to enable individuals, including individuals with disabilities or other special needs, to attend and complete programs (as evidenced by program schedules and documentation of support services available).

12. Whether the eligible provider maintains a high-quality information management system that has the capacity to report measurable participant outcomes (consistent with WIOA, Title II, Section 116) and to monitor program performance (as evidenced by prior participation in or a commitment to participate in the eligible agency’s Connecticut Competency System and Connecticut Adult Reporting System and to submit comprehensive, timely, and accurate data).

13. Whether the local areas in which the eligible provider is located have a demonstrated need for additional English language acquisition programs and civics education programs (as evidenced by area demographic data).

Adult Education and Literacy Activities (Section 203 of WIOA)

The CSDE will require eligible providers receiving grant funding to carry out corrections education or education for other institutionalized individuals and use the grant funds to operate the following adult education programs/activities:

Adult Basic Education (ABE)

ABE instruction is designed for adults seeking a high school diploma who are functioning below the secondary school level and lack the basic reading, writing and numeracy skills necessary to function effectively as workers, parents and citizens. Instruction can be individualized or offered in a classroom or a learning lab. Persons completing ABE are prepared to benefit from secondary level instruction.

ABE educational functioning levels are as follows:

a. Beginning ABE Literacy (Grade Levels 0–1.9);

b. Beginning Basic Education (Grade Levels 2.0–3.9);
c. Low Intermediate Basic Education (Grade Levels 4.0–5.9); and

d. High Intermediate Basic Education (Grade Levels 6.0–8.9).

Adult Secondary Education (ASE)

Connecticut Adult Education offers three distinct pathways for adults to attain a high school diploma.

(1) Adult High School Credit Diploma (AHSCD):

The Adult High School Credit Diploma program is a prescribed plan, process and structure for earning a required number of academic and elective credits. The provider must be a LEA or RESC. Credits toward a local diploma must be obtained through a prescribed plan. Each provider/town can enhance the basic AHSCD program but must adhere to the minimum state requirements: 1) use certified teachers and counselors; 2) adhere to CSDE requirements regarding assessment, enrollment, accountability and reporting; 3) meet required credit standards; and 4) ensure that a one credit course offers a minimum of 48 instructional hours. An adult who successfully completes the required credits of the AHSCD program is awarded a high school diploma by the providing LEA or RESC.

(2) General Educational Development (GED):

Adults who have not completed high school must demonstrate, through an examination, the attainment of academic skills and concepts normally acquired through completion of a high school program. Applicants for this examination must be at least 17 years of age and officially withdrawn from school for at least six months. Individuals who pass the GED Tests are awarded a Connecticut State High School Diploma. GED instructional programs, provided throughout the state in local school districts and a variety of other instructional sites, help individuals to prepare for this rigorous examination.

(3) National External Diploma Program (NEDP):

This program provides a secondary school credential designed for adults who have gained skills through life experiences and demonstrated competence in a particular job, talent or academic area. The NEDP is an online portfolio assessment program that offers no classroom instruction. An adult who successfully completes the portfolio assessment, as required, is awarded a high school diploma by the providing LEA or RESC.

Adult Secondary Education (ASE) programs must integrate functional life and employability skills into the curriculum, incorporate technology into the instructional process, and provide comprehensive counseling, transition and support services in collaboration with other community or human services organizations.

ASE educational functioning levels are as follows:

a. Low Adult Secondary Education (Grade Levels 9.0–10.9); and

b. High Adult Secondary Education (Grade Levels 11.0–12.9)
Workplace Adult Education and Literacy Activities

(1) Workforce Education Services

Programs will provide workforce preparation skills including literacy instruction, employability skills, career exploration and development, and links to employment, employment services and other options in order to respond to the evolving needs of the business community and promote individual self-sufficiency. Workforce readiness programs offer instruction to support transition to work, entry-level employment and reentry into the workforce for unemployed individuals.

Family Literacy Activities

Family literacy activities are services that make sustainable improvements in the economic prospects for a family and better enable parents or family members to support their children’s learning needs. Activities include the following: parent or family adult education and literacy activities that lead to readiness for postsecondary education or training, career advancement and economic self-sufficiency;

interactive literacy activities between parents or family members and their children; training for parents or family members regarding how to be the primary teacher for their children and full partners in the education of their children; parent literacy training that leads to economic self-sufficiency; and age-appropriate education to prepare children for success in school and life experiences. Family Literacy Services are to benefit the child, the parent and the community. Program services will focus on enabling parents to become full partners in the education of their children and provide workforce preparation. Services will be of sufficient intensity and duration to make sustainable changes in the family.

English Language Acquisition Activities

English language acquisition activities include programs of instruction that are designed to help eligible individuals who are English language learners achieve competence in reading, writing, speaking, and comprehension of the English language; and that lead to (1) the attainment of a secondary school diploma or its recognized equivalent and (2) transition to postsecondary education and training or employment.

(1) Americanization/Citizenship

Americanization/Citizenship programs include instruction designed for foreign-born adults who wish to become United States citizens. Persons completing this program are prepared to pursue citizenship through the prescribed process of the United States Citizenship and Immigration Services.

(2) English as a Second Language (ESL)

English as a Second Language instruction is designed for adults who have limited proficiency in the English language or whose native language is not English. ESL programs assist individuals to improve their English skills in listening, speaking, reading and writing in order to find or maintain employment, attain citizenship, become more involved with their children’s schooling and make greater use of community resources. Instruction is provided in English as a unifying means of serving the broad ethnic diversity of limited-English-speaking adults.
Integrated English Literacy and Civics Education

The term "integrated English literacy and civics education: means education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries, that enables such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Such services shall include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation, and may include workforce training.

Integrated English Literacy and Civics Education (EL/Civics) programs must contain the following:

• contextualized instruction in literacy and English language acquisition, the rights and responsibilities of citizenship, naturalization procedures, civic participation and U.S. history and government;

• program design and goals that focus on preparing adults for employment in in–demand industries and occupations that lead to economic self–sufficiency;

• curriculum focus on skills that will provide information and support in the skills necessary for the workplace;

• coordination with the local workforce system, and activities provided in combination with integrated education/training (IET) activities;

• improvement of literacy skills including speaking, reading, writing and numeracy in order to provide learners with the skills to apply English and mathematics accurately and appropriately in a variety of home, community, workplace and academic settings;

• opportunities for experiential learning in which participants are actively engaged in community pursuits are included in the program design;

• utilization of research–based instructional models that have proven effective in teaching individuals to read, write and speak English effectively;

• collaboration with community agencies that offer services to limited English proficient populations; and

• embedding technology literacy into the core curriculum.

Additional program activities directly related to the use of these funds include:

• participation in career pathways exploration and distance learning activities that impact competence in the workplace;

• integration of various hand–held technologies into classroom work including tablets and smart phones;

• creation of video oral histories;
• exposure to basic math vocabulary and interpretation of charts, tables and graphs;

• knowledge of the American education system with special focus on addressing the needs of families new to the U.S. school system; and

• cross-cultural perspectives, civic responsibility, democracy topics and independent projects.

Integrated English Literacy and Civics Education also provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.

Workforce Preparation Activities or Integrated Education and Training

The CSDE will continue to assist the DOL with expanding the development and implementation of the I–BEST delivery model offering industry–recognized credentials. Adult Education programs will work with WDB areas to provide I–BEST training to Jobs First Employment Service (JFES) clients who receive Temporary Family Assistance (TFA).

Programs must demonstrate a commitment to provide appropriate support services to students enrolled in the integrated pathway program. These services may include, but are not limited to tutoring or other academic supports, college navigation support, career planning, transportation assistance, and/or childcare.

SPECIAL RULE

Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of Title II, subtitle C, any of the following academic programs for:

a. Adult education and literacy activities;
b. Special education, as determined by the eligible agency;
c. Secondary school credit;
d. Integrated education and training;
e. Career pathways;
f. Concurrent enrollment;
g. Peer tutoring; and
h. Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

The CSDE will reserve no more than 20 percent of its federal grant received under WIOA to provide programs for corrections education and education for other institutionalized individuals as described in Section 225 of the Act. Funding under Section 225 will include the following correctional institutionalized settings: prisons, jail reformatories, detention centers, halfway houses, community based rehabilitation centers or other similar institutions designed for the confinement or rehabilitation of criminal offenders. The CSDE shall also require that each eligible provider using grant funds under Section 225 to carry out a program for criminal offenders in a correctional institution shall give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

The CSDE shall require that each eligible provider use the grant funds to operate education programs as follows: 1. Adult Basic Education (ABE). 2. English Literacy Acquisition (ELA). 3. Secondary school completion (Adult High School Diploma).

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

1. DESCRIBE HOW THE STATE WILL ESTABLISH AND OPERATE INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAMS UNDER SECTION 243 OF WIOA, FOR ENGLISH LANGUAGE LEARNERS WHO ARE ADULTS, INCLUDING PROFESSIONALS WITH DEGREES AND CREDENTIALS IN THEIR NATIVE COUNTRIES.

CSDE will establish and operate English Literacy and Civics Education programs as a part of its adult education program. The term "integrated English literacy and civics education" means education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries, that enables such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Such services shall include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation, and may include workforce training. Since the Workforce Innovation and Opportunity Act (WIOA) requires an intentional connection to the workplace, to careers and to the workforce system (employers, Workforce Development Boards (WDB), Chambers of Commerce, etc.) for Integrated English Literacy and Civics Education programs, CSDE will work with the Connecticut Department of Labor to expand its Integrated education and training delivery model (I–BEST) offering industry–recognized credentials to Integrated English Literacy and Civics Education programs. Adult Education programs will work with WDBs in local workforce areas to provide assistance to local programs. CSDE will hold meetings with grantees regarding the requirements of the program and provide mandatory professional development sessions for EL/Civics instructors and staff on integrating career awareness, workforce
skills, and career pathways. Eligible providers will design programs that deliver the activities under WIOA including the integration of literacy and English language instruction with occupational skill training, including promoting linkages with employers. Eligible providers must demonstrate their ability to prepare English language learners for unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency, and how they will integrate the program with the local workforce development system to carry out the activities of the program.

2. DESCRIBE HOW THE STATE WILL FUND, IN ACCORDANCE WITH THE REQUIREMENTS OF TITLE II, SUBTITLE C, INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION SERVICES AND HOW THE FUNDS WILL BE USED FOR THOSE SERVICES.

CSDE will issue a Request for Proposals (RFP) for Integrated English Literacy and Civics Education. The RFP requires the following for funded programs: program design and goals that focus on preparing adults for employment in in–demand industries and occupations that lead to economic self–sufficiency; curriculum focus on skills that will provide information and support in the skills necessary for the workplace; coordination with the local workforce system; and activities provided in combination with integrated education/training (IET) activities. Funds will be specifically allocated for teacher professional development. Funds will be used for instructional costs (instructional pay, curriculum materials, and software that connects to career pathways) for ESL teachers. Funds will be used to serve those individuals who are most in need of the program. Funds will be distributed on an as–needed basis for programs that request an ESL program. To ensure direct and equitable access for all eligible providers, CSDE will publish a Notice of Availability in all major Connecticut newspapers and post the notice on the CSDE's web page. The RFP will be mailed to: all local education agencies and higher education institutions; a master list of current and past providers including community-based organizations, regional education service centers, housing authorities, volunteer organizations, the Connecticut Department of Correction (DOC), other correctional facilities and institutions; and to all current providers and WDBs. A Bidders' Conference will be publicly advertised with the Notice of Availability and will be held at a central location to provide answers to questions regarding appropriateness of proposed projects and application procedures. Local grants will be distributed based on the ability to meet the requirements of AEFLA Purposes outlined in WIOA Section 243. CSDE will make funding available to each of Connecticut's five designated local workforce areas. In conjunction with each WDB, CSDE will help to assess local area needs and WIB goals. The RFP will establish a minimum six-week turnaround time between RFP distribution and proposal submission to CSDE. A review team comprised of inter-agency staff and experts in each priority area will evaluate proposals responding to the RFP. Interagency participants will include representatives of CSDE, the WDB and One-Stop partners. The review team will evaluate each proposal using a standardized evaluation form based on required Federal, State and regional criteria published in the RFP (including the considerations listed in Section 231 (e). Eligible providers must demonstrate in their application for funds the manner in which the program will be delivered in combination with integrated education and training activities. These activities can be provided directly or through collaboration with WIOA or other community partners.
E. STATE LEADERSHIP

1. DESCRIBE HOW THE STATE WILL USE THE FUNDS TO CARRY OUT THE 
REQUIRED STATE LEADERSHIP ACTIVITIES UNDER SECTION 223 OF WIOA.

The CSDE sent a survey via Survey Monkey to all local program directors as well as all WIA funded 
providers on October 22, 2015, to obtain their input on the state plan. The survey listed 17 WIOA 
requirements for funding local programs and state leadership activities. Description of Required 
Activities: (1) The CSDE will work with other core programs and One–Stop partners to ensure that 
adult education and literacy activities are in alignment and to develop career pathways which provide 
access to employment and training services for individuals in adult education and literacy activities. 
The CSDE will collaborate with the DOL to assist local providers in partnering with One–Stop 
Centers to develop career pathways and provide access to employment and training services. 
Professional development will be provided to local programs, including orientation to adult education 
programs and services for One–Stop partners and other agencies.

Since the greatest need identified from the survey of local programs was meeting regional needs 
and demonstrating alignment between proposed activities and services with core partners, the 
CSDE will ensure that training and technical assistance will address these two issues. It will also 
assist local programs in becoming familiar with the regional/state plan to determine how it affects 
their programs. The CSDE will also work with local programs to establish stronger linkages with 
partners such as local schools, WDBs, One Stop centers, and job training programs. (2) Connecticut 
has instituted high quality professional development programs to improve instruction. Training will be 
provided related to the specific needs of adult learners and information about models and promising 
practices will be disseminated. To enhance program quality and assure continued progress in 
meeting the Core and Additional Indicators of Performance, the CSDE shall award grants to eligible 
providers to deliver State Leadership activities, primarily professional development activities, with 
funds made available under this subtitle. In order to meet the various needs of our state, the CSDE 
may enter into partnerships with other states and/or the federal government in order to 
collaboratively fund projects that will meet individual needs and accomplish common goals. The 
CSDE shall not use more than 12.5% of the funds awarded under this subtitle for State Leadership 
activities. The CSDE will deliver a majority of its State Leadership and professional development 
services through the Adult Training and Development Network (ATDN). The CSDE’s professional 
development model supports the implementation of the goals of Connecticut’s Adult Education State 
Plan and consists of professional development basics and activities related to the implementation of 
career pathways. (3) The CSDE will provide technical assistance to local grantees in: • the 
development and dissemination of instructional and programmatic practices based on scientifically 
valid research available and appropriate, in reading, writing, speaking, mathematics, English 
language acquisition, distance education, staff training and content standards; • the role of eligible 
providers as a one–stop partner to provide access to employment, education, and training services; 
and • assistance in the use of technology, including for staff training, to eligible providers, especially 
the use of technology to improve system efficiencies. Although serving students with low literacy 
skills or who are English language learners or individuals with disabilities, including learning 
disabilities was not rated by most local programs as being one of their strongest needs, providers did 
express that they need assistance with curriculum materials and teaching strategies/best practices 
for students who are non–literate in their native language and with developing a scope and 
sequence curriculum for low level literacy skills and individuals with disabilities. Another area 
identified on the survey as a need is technical assistance in helping local programs identify 
instructional practices which will enable students to pass the new GED tests. Most programs felt 
confident in teaching reading, writing, speaking and English language acquisition, but one program
stated staff needs help in ways to improve the depth of math instruction. The CSDE will also provide technical assistance in serving adults with special learning needs and disabilities including disability awareness sessions, resource and instructional materials, accommodation and instruction planning workshops, train-the-trainer sessions, referral information and telephone consultation concerning program issues. (4) The CSDE will conduct program monitoring and evaluation to ensure compliance with federal and state funding requirements and to determine the effectiveness of programs in meeting the needs of the adult population and will disseminate information about models and proven or promising practices within the State. The CSDE has in place a data reporting system for each local provider, the Connecticut Adult Reporting System (CARS). The CARS system can measure performance outcomes. The CSDE has developed a formalized follow-up and reporting process to report on the core indicators of obtaining or retaining employment and entering post-secondary education according to National Reporting System requirements. The follow-up and reporting process includes data sharing with other state agencies, including the Department of Labor wage information system. The CSDE will participate in the statewide data system which will assist the CSDE in working seamlessly with other partners while protecting the privacy rights of individuals. To provide the core service of performance and cost information for WIOA, Title II, Section 231 providers to the One-Stop system, the eligible agency will develop a report which includes each program’s success in meeting the state adjusted levels of performance. This data will assist potential clients in identifying an appropriate adult education or literacy program in the local area.

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

Description of Permissible Activities (1) The CSDE will provide training and technical assistance to local programs in technology applications, translation technology and distance education, including professional development to support the use of instructional technology. Training and technology assistance to local programs in technology applications, especially in the area of web-based communication (social media, phone apps, etc.) will be provided as well as assistance in finding access to computers. (2) The CSDE will develop and disseminate curricula including literacy curricula which uses instructional practices such as phonemic awareness, phonics, fluency and reading comprehension that research has proven effective for adults. (3) The CSDE will develop content and models for integrated education and training and career pathways. Connecticut Competency System (CCS) training sessions will be offered by both adult education and the workforce development community. The CCS is an integral part of the CSDE’s career pathways, standards-based framework utilizing the Comprehensive Adult Student Assessment Systems (CASAS) to connect curriculum, assessment, and instruction that is able to capture progress made by adult education learners. (4) The CSDE will provide assistance to eligible providers in developing and implementing programs that achieve the objectives of this title including meeting the state adjusted levels of performance. The CSDE will provide technical assistance in implementing the CCS for appraisal, instruction and assessment in a life-skills and an employability context, including new teacher training, CCS Facilitator training, One Stop partner staff training as well as the ordering and dissemination of CASAS curricula materials used in conjunction with the Connecticut Competency System. The CARS system will collect student demographic, attendance, assessment and outcome information for each student in the adult education program. The CARS system generates statewide and local demographic and performance assessment reports used for program planning, management and accountability. Data from the system allows the State to assess the effectiveness of local programs by measuring performance outcomes. (5) The CSDE will continue to partner with community colleges and other institutions of higher learning to assist adults to transition to postsecondary education and training. Training and technical assistance will be provided on
effective methods of transitioning students. The CSDE will ensure that training and technical assistance will be provided, especially in areas such as employer engagement, the institution of career counselor position, and/or enhanced job responsibilities for current staff emphasizing transitions. The CSDE will also provide assistance in the implementation of training programs that assist adults in obtaining economic self-sufficiency. (6) The CSDE will work with the DOL to expand its I–BEST delivery model offering industry–recognized credentials to Integrated EL/Civics programs. Training and technical assistance will be provided to local grantees for the integration of literacy and English language instruction. CSDE will provide activities for the integration of literacy and English language instruction with occupational skill training, including promoting linkages with employers. The CSDE will assist local programs by sharing effective models, assisting local programs in engaging employers, and how to partner successfully with other agencies to place students in employment.

(7) The CSDE will provide technical assistance and training to promote workplace adult education and literacy activities by identifying curriculum frameworks and aligning rigorous content standards that specify what adult learners should know and be able to do in the areas of reading and language arts, mathematics, and English language acquisition; and taking into consideration the following: 1. State adopted academic standards. 2. The current adult skills and literacy assessments used in the State or outlying area. 3. The primary indicators of performance described in WIOA, Title II, Section 116. 4. Standards and academic requirements for enrollment in non–remedial, for–credit courses in postsecondary educational institutions or institutions of higher education supported by the State.

Connecticut training staff will continue to work closely with the pilot programs and will provide overview sessions throughout the State to increase awareness and knowledge. Also, CCRSs have been incorporated into all workshops in math, reading, and writing. Working with ELA students in the area of workplace training was identified on the survey as a need; therefore, the CSDE will work with local programs to identify a variety of curricula for workplace training.

(8) The CSDE will develop and pilot strategies for improving teacher quality and retention. Training staff will provide sessions on learning styles and needs, facilitating adult learning, planning for instruction, and monitoring student progress.

(9) The CSDE will assist in the development and implementation of programs and services to meet the needs of adult learners with learning disabilities or English language learners.

F. ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

Performance Accountability: Performance Accountability assesses the effectiveness of grantees in achieving continuous improvement of adult education and literacy activities. The performance outcome measures shall consist of the following core indicators: 1. The percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program; 2. The percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from the program; 3. The median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program; 4. The percentage of program participants who obtain either a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year of exit from
program; 5. The percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving measurable skill gains towards such a credential or employment; and 6. The indicators of effectiveness in serving employers established pursuant to clause (iv). Setting Targets: Each fiscal year CSDE negotiates proposed target percentages for each of the core indicators of performance with the U.S. Department of Education, Office of Career, Technical and Adult Education (OCTAE). Each local eligible program is responsible for meeting or exceeding the negotiated performance targets. Each program shall analyze progress towards meeting the targets on an ongoing basis. Each program must utilize the approved standardized assessments that provide the framework needed to measure program effectiveness. Central to the evaluation process is an assessment of Performance Measures established by CSDE to focus on continual progress, successful completion of the program area, and successful transition to a next step of employment, postsecondary education, or occupational training. For example, CSDE’s performance measures for secondary completion programs focus on interim student progress by requiring providers to report on the number of students who pass one or more subsections of the GED practice test or earn one or more credits toward an adult high school diploma, and requiring them to report on number of students who earn a diploma or its recognized equivalent. Incorporating this performance measure into the evaluation process will ensure that the eligible agency and local provider assess each student’s progress toward program completion and analyze significant changes indicated by this interim progress indicator. CSDE has also developed four Additional Indicators of Program Performance that require providers to address all aspects of program operation: recruitment, curriculum and instruction, support services and professional development. These additional indicators assure that programs will focus on long–term planning for program development and community responsiveness rather than focusing solely on current year issues and achievements. These indicators also assure that adult education providers develop learner and community–responsive programs and curricula so they can become an integral part of the local education system as it works toward lifelong learning and self–sufficiency for all community members, especially those most in need of literacy services. Core and additional Indicators of Performance will become a focal point for annual and on–site monitoring reviews and the basis for formative evaluation. Monitoring and Evaluation : To improve the quality and effectiveness of adult education programs, CSDE will conduct two evaluation processes: an annual desk–audit for all providers, and an on–site monitoring evaluation for selected providers. On–Site Monitoring: An on–site monitoring evaluation will be conducted for a minimum of 25% of Federally funded adult education programs each year to determine the effectiveness of adult education and literacy programs and activities. All newly funded programs will be monitored, as will all programs that had non–compliance or RFP Requirement issues during previous year’s monitoring. These evaluations shall, at a minimum, consist of assessing the following areas: a)Compliance with all applicable laws and RFP guidelines, including ADA 504 and Section 427 GEPA; b)Program management and operations including scheduling and locations as well as staff credentials; c) Outreach, recruitment and retention practices including individuals with multiple barriers to education; d) Curriculum and instruction and use of technology; e) Support services including counseling and transition services; f) Professional development opportunities; g) Student intake, assessment and documentation procedures; h) Documentation of the program’s ability to assist adults in gaining employment, achieving self–sufficiency, and/or developing family literacy practices; i) Documentation of the program’s progress in meeting the Performance Measures set for each applicable Core Indicator of Performance; j) Documentation of the program’s ability to meet the Additional Indicators of Program Quality. Written reports of the on-site monitoring will be given to programs monitored. Local programs will have to submit a corrective action plan for any deficiencies noted during the visit. CSDE will observe classes and talk with teachers and program staff to determine if ideas from professional development are being implemented. Desk Monitoring: For the annual desk audit review, each provider will submit an assessment of Performance Measures and individual program goals as well as an annual expenditure report including all relevant
fiscal records to facilitate an effective audit. Each program will also be required to submit data containing all program and student information stored in its Connecticut Adult Reporting System, including demographic, assessment and outcome data for each student enrolled. If a local program does not meet its outcome measures, it must complete a corrective action plan outlining how to make necessary improvements.

Professional Development: CSDE will provide professional development to local programs to improve program quality. Instruction will be designed to (1) improve instruction in the essential components of reading instruction, (2) instruction related to the specific needs of adult learners, (3) instruction provided by volunteers or paid personnel, and (4) dissemination of information about models and promising practices. Participants will be asked to evaluate the training sessions to determine if the sessions fit their needs. Changes are made to future workshops based on those evaluations. CSDE will include in its on-site monitoring an evaluation of local instructional practices to determine if its professional development is being implemented.

CERTIFICATIONS

States must provide written and signed certifications that

1. The plan is submitted by the State agency that is eligible to submit the plan. Yes

2. The State agency has authority under State law to perform the functions of the State under the program. Yes

3. The State legally may carry out each provision of the plan. Yes

4. All provisions of the plan are consistent with State law. Yes

5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan. Yes

6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan. Yes

7. The agency that is submitting the plan has adopted or otherwise formally approved the plan. Yes

8. The plan is the basis for State operation and administration of the program. Yes

CERTIFICATION REGARDING LOBBYING

Certification for Contracts, Grants, Loans, and Cooperative Agreements

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

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

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

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

STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

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

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

Applicant's Organization: Connecticut State Department of Education

Full Name of Authorized Representative: Dr. Dianna R. Wentzell

Title of Authorized Representative: Commissioner of Education

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

ASSURANCES

The State Plan must include assurances that:

1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding supplement and not supplant provisions). Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA. Yes

3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not “eligible individuals” within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA. Yes

4. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities; Yes

5. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and Yes

6. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program. Yes
PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (GENERAL)

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

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

A. INPUT OF STATE REHABILITATION COUNCIL

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


The mission of the State Rehabilitation Council (SRC) is to provide assessment, advice and recommendations to the Bureau of Rehabilitation Services (BRS or the bureau) and others regarding coordination and effectiveness of programs and strategies that promote community-based competitive employment for persons with disabilities. The SRC maintains an ongoing collaboration with BRS. The SRC is comprised of volunteers, many of whom are current or former vocational rehabilitation (VR) consumers or family members of VR consumers. They are appointed by the Governor to review and assess the effectiveness and delivery of vocational rehabilitation services provided for individuals with disabilities who are seeking employment.

The SRC has participated in the following endeavors in FY 2015:

1. Development of the BRS 2017 State Plan;

2. Community Rehabilitation Providers (CRP) Annual Meeting;

3. National Council of State Rehabilitation Councils (NCSRC) Conferences in Bethesda, MD and Miami, FL and Teleconferences (six);

4. The Council of State Administrators for Vocational Rehabilitation (CSAVR) Conferences in Bethesda, MD and Miami, FL;

5. SRC Meetings (six per year);

6. Review of the 722 Report regarding Administrative Hearing Outcomes; and
7. Updates of Corrective Action Plans resulting from the Rehabilitation Services Administration 2013 Monitoring.

WIOA

In July, 2014, Congress passed the Workforce Innovation and Opportunity Act (WIOA) to unify the state programs that provide employment services. This bill established some significant changes to the Vocational Rehabilitation (VR) program. At the May 2015 SRC meeting, Acting BRS Director, Amy Porter, reviewed the changes that will impact the VR program and plans the agency has undertaken to prepare to adapt to these new requirements and partner with new entities to provide cohesive employment and training programs for all of Connecticut’s residents. These changes will be reported in the upcoming Unified State Plan due March 3, 2016. The SRC worked to better understand WIOA requirements and the desired outcomes that would improve employment services for people with disabilities. The SRC also began to assess how BRS could incorporate changes that would help the VR program successfully meet these new goals.

Agency Update

David Doukas became the new Director for BRS on August 21, 2015. He will attend SRC meetings and provide members with information and updates about the VR program. The SRC looks forward to working with Mr. Doukas to continue to improve the quality of services for people in the program.

BRS Public Meetings

Due to WIOA, the deadline for the submission of the next State Plan was changed to March, 2016. As part of the focus for the public meeting is to review the State Plan, BRS and the SRC will host public meetings in January/February. Consumers, their families, and others interested in the VR program will be invited to review the draft of the 2017 Unified State Plan that features VR program specific information and employment information and goals among the state partners, as established by WIOA. Their feedback will inform the final version of the Unified State Plan.

Consumer Survey

In response to the SRC’s goal to assess the effectiveness and delivery of VR services provided by BRS, the SRC collaborated with BRS to commission the Center for Public Policy and Social Research (CPPSR) at Central Connecticut State University (CCSU) to conduct a consumer satisfaction survey of VR recipients for fiscal year 2015. The purpose of this survey is to evaluate the job search services that consumers/participants received from the VR program at BRS.

Two hundred and three consumer interviews were conducted from August 10th through September 24th, 2015. The construction of the survey instrument was a collaborative effort between the SRC, BRS and CPPSR. The list of consumers from which this survey data is drawn was provided by BRS. That list of 600 individuals represents a small sampling of the 8,672 current and former VR consumers that BRS served in fiscal year 2015. Consumer names were pulled from all regions.

Of the 600 consumer names provided for the survey, 75 individuals chose not to respond to the survey and 88 individuals could not be reached due to an out-of-service number, an inaccurate number, or use of a privacy device. Three individuals were either deceased or incarcerated, while six others had language barriers. The remaining 225 consumers did not answer the phone following
numerous attempts, throughout multiple days and evenings. CPPSR called each consumer a minimum of seven times, though in most cases, attempts reached upwards of ten calls.

Out of the respondents who CPPSR was able to reach, this survey has a 6% margin of error at the 95% confidence interval. This means that statistical differences outside of the +/- 6% margin of error will only exist approximately 5% of the time.

SRC Recommendations to BRS

The Designated State unit’s response to the Council’s input and recommendations Several of these recommendations appeared last year, but the SRC believes they are ongoing issues that warrant continued attention this year.

Recommendation 1 – We support BRS as it seeks new locations to better serve VR consumers. We applaud efforts to insure better visibility of BRS offices. We continue to recommend that signage to enable optimum visibility be a priority of all offices. The SRC is requesting that updates on signage and access to all buildings continue to be provided at SRC meetings. BRS Response: The bureau continues to be very active in its endeavor to improve the physical locations of our offices. We have completed two critical re-location projects in the first quarter of FFY 2016 and are planning additional moves within this year. We agree that both exterior and interior signage at our offices could be improved and have been systematically working toward addressing this. In many locations municipal building codes, landlord issues and physical space itself limits our signage options, but efforts to maximize our visibility are to be made wherever possible.

Recommendation 2 – The accessible parking in the Waterbury office is on a grade that makes it difficult for consumers who use wheelchairs to transfer out of and into vehicles. The SRC recommends that when the parking lines are repainted, the accessible spaces be moved further right where the grade is not difficult to maneuver.

Recommendation 3 – Some consumers are still confused upon arrival at offices shared with DSS. It would be beneficial to consumers and families if BRS expands the website to include pictures of offices and perhaps a virtual tour of each office so consumers will know where to park and what to expect when entering into the building.

Recommendation 4 – The SRC recommends BRS strengthen communication between counselors and consumers, especially when consumer cases are being transferred to another counselor. We would like to know what BRS expects of staff regarding response time to consumer telephone calls and emails. We would also like to have reports on how staff is meeting that expectation. Also, what is the procedure to ensure consumer contact is not lost when cases are transferred to new counselors?

Recommendation 5 – The SRC has a continued interest in all of the state agency collaborative projects including the Department of Mental Health and Addiction Services (DMHAS)/BRS Agency Collaborative regarding services and employment options for consumers with psychiatric issues, the Department of Developmental Services (DDS)/BRS agency collaborative and the Bureau of Education Services for the Blind (BESB) and BRS collaborative. Please provide updates at the SRC meetings about any achievements that have been attained, the strategies that have been developed to improve outcomes, the training that is available to staff, and any activity that will occur as a result of BRS’ attendance at the CSAVR conference.
Recommendation 6 – The Business Committee will continue efforts to make presentations about BRS to businesses and chambers of commerce to help publicize the VR program. The committee would like to work closely with BRS to develop a brochure to distribute on these occasions. The SRC requests regular updates regarding new projects and initiatives that will benefit the business community.

Recommendation 7 – The SRC recommends that BRS increase engagement with businesses to increase hiring of VR consumers.

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

BRS Response 1: The bureau continues to be very active in its endeavor to improve the physical locations of our offices. We have completed two critical re-location projects in the first quarter of FFY 2016 and are planning additional moves within this year. We agree that both exterior and interior signage at our offices could be improved and have been systematically working toward addressing this. In many locations municipal building codes, landlord issues and physical space itself limits our signage options, but efforts to maximize our visibility are to be made wherever possible.

BRS Response 2: The bureau has been and will continue to work closely with the Connecticut Department of Administrative Services and the lessor of our Waterbury office related to the re-grading and expansion of the parking lot. We will continue to pursue improvement at this location, insure no issues are present at newly established locations and also address any additional issue that are identified at other existing office locations.

BRS Response 3: BRS continually updates website content, including information related to BRS offices. We will look into providing pictures of the locations. We will also update the directions to include parking and building entrance instructions. The state of Connecticut is implementing a new website portal that we hope will be functional in 2016. Once this website is implemented we plan to provide user friendly and accessible information for the general public, which will include BRS office information in detail. In addition, we will continue to utilize social media to provide outreach to consumers and the public to increase awareness of office locations and services.

BRS Response 4: The VR Supervisors oversee case transfers and will continue working on a resolution to this concern. Going forward, consumers can expect that within two weeks of requesting a transfer to another counselor and/or office they will be contacted by the new counselor, (or his/her designee) to schedule an appointment. In the case of case transfers happening due to a caseload vacancy, consumers receive a letter as soon as the vacancy occurs with contact information to be used until the position is filled. Mechanisms for formally tracking transfer cases and yielding metrics related to response times will be investigated and, to the extent possible, developed.

BRS Response 5: BRS continues to maintain Memoranda of Understanding/Agreement and active, robust partnerships with various state agencies. We are committed to routinely sharing information about these collaborations and will continue to do so.

BRS Response 6: BRS supports the SRC in their reaching out to businesses and chambers of commerce to market our services. We have a variety of materials developed that are geared toward highlighting the benefits of employers working with the VR program. We would be interested in presenting these materials to the SRC and developing any additional brochures that are determined
necessary. The bureau will also offer regular updates regarding initiatives and projects with the employment community at SRC meetings.

Response 7: BRS Response: BRS remains very committed to engaging with businesses. This is evident in BRS housing a business services unit, Connect–Ability Staffing, which is responsible for business outreach and development throughout Connecticut. BRS plans on expanding Connect–Ability Staffing’s capacity for outreach in order to facilitate more connections with businesses and, ultimately, more employment opportunities for VR consumers.

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

The designated state unit did not reject any of the Council’s input or recommendations.

B. REQUEST FOR WAIVER OF STATEWIDENESS

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

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

The Bureau of Rehabilitation Services is not requesting a Waiver of Statewideness.

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

Not applicable.

3. ALL STATE PLAN REQUIREMENTS WILL APPLY

requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Not applicable.

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

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:
1. FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS;

BRS has Memoranda of Agreement (MOA) and Memoranda of Understanding (MOU) with the following entities:

(1) Federal, State, and local agencies and programs:

a) Social Security Administration: Information Exchange Agreement to receive data regarding consumers’ work history. b) The Connecticut Department of Veterans’ Affairs MOU enables collaboration of services for veterans.

c) The Connecticut Distance Learning Consortium MOA enables BRS to create and host the Connect–Ability Distance Learning Initiative (DLI) which are free online e–learning modules for job seekers with disabilities, employers, Community Rehabilitation Providers, vocational rehabilitation staff and others. Modules are accessible and some are available in Spanish or American Sign Language. BRS also uses the DLI as a training registration platform for staff trainings.

d) The Department of Social Services (DSS) MOA enables DORS/BRS to receive select administrative supports and access to information systems, applications and networks from DSS. It also formalizes the transfer of funding to conduct Learning Disability evaluation services related to the collaboration in serving potentially eligible consumers receiving Temporary Assistance for Needy Families (TANF).

e) The Mashantucket Pequot Tribal Nation (MPTN) MOU enables collaboration and coordination of vocational rehabilitation services.

f) Through the Secure Jobs Connecticut Pilot, a Letter of Agreement enables BRS and the Departments of Education (SDE), Housing (DOH), Labor (DOL), and Social Services (DSS) to collaborate with the Community Foundation for Greater New Haven, the Connecticut Coalition to End Homelessness, the Connecticut Women’s Education and Legal Fund, Fairfield County’s Community Foundation, the Hartford Foundation for Public Giving, the Liberty Bank Foundation, the Melville Charitable Trust, the Office of Early Childhood, the Partnership for Strong Communities, the United Way of Greater New Haven, and the United Way of CT to end homelessness by 2015 for Veterans, 2016 for those experiencing chronic homelessness, and by 2022 for families with children and youth.

g) BRS also has agreements with Central Connecticut State University and the University of Maine, Farmington to train student interns.

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

The Connecticut Assistive Technology (AT) Act Program is housed within DORS along with BRS, therefore an MOA is not needed. The Program Director for the AT Act program serves in the role of AT Consultant to the VR program and a strong relationship has been established. The AT Act program operates an AT device lending service specifically for VR consumers. The Program Director provides AT demonstrations when needed and assists VR consumers in participating in reuse activities. Additionally, VR consumers are able to utilize the alternate financing program operated by
the AT Act program to assist in paying for needed devices that the VR program may not be able to provide, such as vehicles, which can then be modified by the VR program.

The following are formal agreements that have been established to provide activities under section 4 of the AT Act: a) The State Education Resource Center (SERC) MOU enables SERC to expand newly established Assistive Technology (AT) Device Demonstration Center to primarily show educators and other school personnel about various AT devices. b) The Southern Connecticut State University MOA enables laptops and iPads with specific software to be loaned to CT K–12 schools for up to four months to allow students to try devices before they are purchased.

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

Through the Department of Rehabilitation Services, BRS is a part of the State Workforce System that engages with the Department of Agriculture’s Disability Employment Program.

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

BRS engages community rehabilitation providers working with out-of-school youth to assess their needs.

5. STATE USE CONTRACTING PROGRAMS.

a) The Office of the Attorney General MOA enables review and approval of Community Rehabilitation Providers (CRPs) contracts and legal representation at Administrative Hearings for consumers.

b) The Office of the State Comptroller MOU provides approval and processing of expenses for consumers and staff.

D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

1. DSU’S PLANS

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

With the passage of WIOA, the BRS Transition Committee has collaborated with the State Department of Education (SDE) and a number of entities to implement pre–employment transition services including the Connecticut Transition Community of Practice, the North East Transition Group, Regional Transition Committee, Transition Task Force, Collaboration Across the Life Span, Education Transition Liaisons, Southern Connecticut State University Career Advisory Committee, CT–AHEAD/Higher Education Schools, the Department of Labor, and the WDBs.
Prior to initiation of pre–employment transition efforts, BRS had liaison counselors assigned to each high school to work directly with students and collaborate with education administrators to sign a referral protocol yearly. With implementation of WIOA, 10 VR counselors have been assigned to work exclusively with students with disabilities.

SDE and BRS have staff that serve on each other’s advisory committees (Transition Task Force and BRS Transition Committee). Program staff attends common training regarding the Individualized Education Plan (IEP), secondary transition services and WIOA. SDE and BRS collaborated to develop a statewide CT Transition Community of Practice (COP) with a broad stakeholder base as a single portal for transition resource development, professional development, and interagency collaboration. SDE and BRS initiated statewide strategic planning with agencies, school districts, families and other stakeholders.

Information on the formal interagency agreement with the State Department of Education (SDE) includes the following:

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;

   a) A Transition Coordinator position is co–funded to provide one–on–one meetings between students, VR counselors, secondary staff, and families. This coordinator also attends group meetings, transition fairs and trainings including Community of Practice (COP) and Education Transition Liaison meetings. She provides 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.

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

   b) BRS and SDE jointly collaborate with school liaisons and secondary staff, students and families.

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

   c) The VR counselors assigned to provide pre–employment transition services will spend 100% of their time delivering these services; 100% of their salaries will be committed as well.
D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES.

d) Procedures for outreach will be identified and implemented through a comprehensive marketing and communication plan. The primary focus will be on marketing and promoting BRS pre-employment transition services to help implement WIOA changes in the VR program. This statewide approach will communicate a consistent VR message.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

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

BRS has partnership agreements with several Community Rehabilitation Programs (CRP); we procure CRP services through Purchase of Service (POS) contracts.

Through a POS contract with the Connecticut Association for Human Services (CAHS), consumers who are 18 or older and are eligible for Social Security Benefits receive Individualized Financial Capability Coaching to improve their knowledge of finances.

F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency’s efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

The bureau provides supported employment and extended services to consumers with significant disabilities, as appropriate. Bureau counselors work with each individual consumer to identify necessary services. In the process of developing an Individual Plan for Employment, the counselor and consumer make decisions about the need for supported employment or extended services. When the services are deemed necessary, the counselor and consumer identify a source of long-term funding and meet with a representative case manager, if appropriate. Once long-term supports are obtained, the plan can be executed. Supported employment and extended services are provided in partnership with our statewide network of Community Rehabilitation Programs (CRP). These arrangements are based on fee-for-service contracts. We use a series of strategies to accomplish the goals of supported or extended employment, including the following:

• The statewide Ongoing Employment Supports Committee is a resource for identifying supported employment funding opportunities on a case by case basis;

• Cooperative agreements with CRPs, One-Stop Centers and Independent Living Centers (ILCs) allow for additional employment supports through the Ticket to Work program; and

• The Interagency Employment Practice Improvement Collaborative for staff in BRS, the Department of Mental Health and Addiction Services (DMHAS), and CRPs is designed to increase successful employment outcomes to an underserved target population.
G. COORDINATION WITH EMPLOYERS

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR SERVICES; AND

VR Services: BRS employs a Business Services Unit, Connect–Ability (CA) Staffing Employment Consultants, which is responsible for employer outreach efforts across Connecticut. The CA Staffing Employment Consultants build relationships with employers to identify their workforce development needs. Through these mutually beneficial relationships, CA Staffing offers business services such as disability awareness trainings, candidate pre-screening, Working Interviews, On-the-Job Trainings and Industry Specific Training and Placement Programs. In turn, the CA Staffing Employment Consultants obtain real-time labor market information that is shared with Vocational Rehabilitation Counselors and participants of the vocational rehabilitation program as part of their career path exploration and decision making process. This dual-customer approach allows BRS to prepare VR consumers for long-term, sustained employment in a constantly evolving labor market.

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

Transition Services: BRS will procure transition services for students with disabilities that include placement with employers to participate in work-based learning experiences and workplace readiness training, as defined in WIOA. The scope of services will include social skill development, independent living, and instruction in self-advocacy, peer mentoring and assistive technology. Upon graduation, Youth will benefit from transition services to prepare for, seek and maintain employment and secure supports needed to be successful.

H. INTERAGENCY COOPERATION

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

The State Medicaid plan under Title XIX of the Social Security Act is a program operated by the Department of Social Services (DSS). For over 20 years until 2014, BRS functioned as a Designated State Unit with DSS serving as its Designated State Agency. As a result of this long-term relationship, BRS has a close working relationship with DSS programs such as TANF, the Medicaid Buy-In, and Money Follows the Person. We offer technical assistance through our Vocational Rehabilitation and Benefits Counseling programs. BRS intends to work with DSS to develop an agreement that formalizes these referral and service processes.
2. THE STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR
INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES; AND

The Department of Developmental Services (DDS) MOU enables coordinated vocational
employment services for people with intellectual disabilities to minimize overlap of resources.

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

The Department of Mental Health and Addiction Services (DMHAS) MOU enables BRS to staff
counselors at Local Mental Health Authority (LMHA) locations.

The Department of Mental Health and Addiction Services (DMHAS) MOA enables BRS to partially
fund a shared position to improve service delivery and collaboration for consumers of both
programs.

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

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

1. DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

A. QUALIFIED PERSONNEL NEEDS.

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

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

BRS maintains a computerized record system for personnel needs, resources, and training. In
addition to this information, the bureau annually uses a caseload management program called
System 7 and results of ongoing needs assessments to analyze personnel needs.

BRS assisted 8,672 consumers in Federal Fiscal Year (FFY) 2015. With 77 VR counselors, the ratio
of VR counselors to all consumers is 1:113; the ratio of VR supervisors to consumers is 1:964. The
ratio of all staff to consumers is 1:65. Of the 8,672 total annual consumers, 3,002 developed an
Individualized Plan for Employment (IPE). Based on the same number of VR counselors, the ratio of
staff to all consumers with an IPE is 1:39; VR supervisors to consumers with an IPE is 1:334; and all
staff to consumers with an IPE is 1:22.

Personnel Category Total Positions

Support (Administrative Assistant, Fiscal, Secretary) 34
Central Office Consultants 11
District Directors 3
Managers 3
VR Supervisors 9
VR Counselors 88

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

Personnel Category Current Vacancies
Support (Administrative Assistant, Fiscal, Secretary) 2
Central Office Consultants 0
District Directors 1
Managers 0
VR Supervisors 0
VR Counselors 11

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.

Personnel Category Projected Vacancies Over the Next 5 Years
Support (Administrative Assistant, Fiscal, Secretary) 6
Central Office Consultants 4
District Directors 1
Managers 0
VR Supervisors 2
VR Counselors 25
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;

We analyze the graduate information from the regional Council on Rehabilitation Education (CORE)–accredited universities to find schools that offer required courses or graduate degrees in rehabilitation counseling. We also check with local CORE schools for the availability of distance learning opportunities for the required CSPD courses. In the state of Connecticut, there is one CORE–accredited institution of higher education that is preparing vocational rehabilitation professionals: Central Connecticut State University (CCSU). All rehabilitation counseling graduates from this college will be eligible to sit for the Certified Rehabilitation Counselor (CRC) exam.

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

Currently, there are 91 students enrolled in the CCSU vocational rehabilitation 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.

There are 11 RSA scholars, with six expected to graduate. Last year, there were 25 graduates from the CCSU program.

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.

BRS sends announcements for Counselor positions to all CORE–accredited institutions of higher education that train VR Counselors in the United States. We have initiated contacts with all CORE–accredited universities so that we can continue to find well–qualified staff for the vacancies we anticipate in the future. In addition to the Connecticut–based CORE institution listed above, we are in close contact with the regional institutions from which we have traditionally found Counselor applicants (Assumption and Springfield Colleges in MA, and Salve Regina in RI); we have staff that serve on advisory boards or teach at these institutions.

The bureau has recruited qualified staff representative of the population of Connecticut: the 32% diversity of our staff exceeds the 22% diversity of our state. We have recruited 11% of our staff from individuals that have disabilities. Our primary challenge has been finding Master’s level counselors
who are proficient with Spanish or American Sign Language (ASL). We will continue the following steps to ensure there is a sufficient pool of qualified counselors for future openings:

• Increase our on–campus college recruitments;

• Increase presentations to high school students. Inner–city high schools with increased percentages of minority students will be targeted to generate interest in rehabilitation counseling as a vocation;

• Increase the number of consumers we help to go into the rehabilitation counseling profession; and

• Increase recruitment, including media that serve diverse populations, and continue online nationwide recruitment.

In Connecticut, there are several factors that ensure retention of staff. The majority of staff leaves because of retirement or choosing to stay home with children rather than leaving for another position. BRS attributes the reasons for retention success as follows:

• BRS recruits staff that is committed to the importance of VR work;

• In–service training is available to staff at all levels;

• Staff may give input into decisions that affect the way they work; and

• Staff can participate in ongoing committees: Staff Training, Regional Training, Community Rehabilitation Providers, Transition, Autism Spectrum, and the BRS Annual Meeting.

The committees ensure that staff have input into the work of the bureau. The committees also give staff opportunities for leadership experiences that will help them prepare for other positions in BRS.

BRS offers staff an opportunity to create Individual Staff Development Plans (ISDP) to identify areas of an employee’s current job that need further development, areas that could be developed to prepare for a future job in the agency, and training needed for either. ISDPs encourage staff to pursue areas of their strength and interest. This activity helps to identify staff training needs and prepares staff for growth needed to meet future succession challenges.

3. PERSONNEL STANDARDS

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:
A. STANDARDS THAT ARE CONSISTENT WITH ANY NATIONAL OR STATE-APPROVED OR -RECOGNIZED CERTIFICATION, LICENSING, REGISTRATION, OR OTHER COMPARABLE REQUIREMENTS THAT APPLY TO THE PROFESSION OR DISCIPLINE IN WHICH SUCH PERSONNEL ARE PROVIDING VR SERVICES; AND

The current requirements for CSPD are based on the national standards for Certified Rehabilitation Counselors. The National Standard is determined by the Commission on Rehabilitation Counselor Certification (CRCC). BRS hires counselors that meet the following:

1. Master’s in Rehabilitation Counseling from a CORE–accredited institution; or

2. Master’s and current Certified Rehabilitation Counselor (CRC) certification; or

3. Master’s in Counseling with one integrated or two separate graduate level courses with the primary focus on the Theories and Techniques of Counseling course(s) as part of the required curriculum; or

4. Master’s, Specialist, or Doctoral degree in one of 13 qualifying majors (as specified by CRCC) granted from a college or university accredited by a recognized regional accrediting body at the time the degree was conferred.

Even though BRS bases its educational standards for VR Counselors on the national standards for Certified Rehabilitation Counselors, it does not require counselors to have CRC certification. However, applicants with a CORE–accredited rehabilitation Master’s degree should be able to sit for the CRC exam.

BRS employees interested in CRC certification are encouraged to contact the Commission on Rehabilitation Counselor Certification at the following website: http://www.crccertification.com/ for more specific information on their credentials and experience. BRS does not guarantee that the above criteria will entitle a counselor to sit for the CRC exam. The bureau provides training at no cost, and offers Continuing Education Units (CEU’s), which will count toward the ongoing training requirements by CRC.


BRS will pay for and require the following graduate courses for new counselors in permanent positions with a Master’s in Counseling as described in 3 or 4 above. The number of additional required courses will depend on the previous education of the new employee as well as total months of vocational rehabilitation counseling experience. The bureau’s definition of education, course curriculum, and experience is based on current standards for the national Certified Rehabilitation Counselor certification:

• 60 months of vocational counseling experience accepted by the credentialing committee – no additional courses are required. CSPD requirements are met.
• Individuals with less than 60 months of vocational counseling experience will be required to take up to nine additional courses, based on a review of the graduate transcript. These specific required courses are determined by CRCC as Theories of Counseling, Techniques of Counseling, Foundations of Rehabilitation Counseling, Assessment, Occupational Information or Job Placement, Medical Aspects of Disability, Psychosocial Aspects of Disability, Multicultural Issues, and Case Management and Rehabilitation Services.

In addition to education requirements, BRS encourages staff to pursue certification in their field. The bureau embraces the CSPD process to ensure a 21st century understanding of the evolving labor force and the needs of individuals with disabilities; continuous organizational development, and, continuous improvement of the competencies of all staff.

BRS also seeks continuous improvements in service delivery, the continuation of a professional level VR staff that can consistently achieve quality employment outcomes as specified in the Rehabilitation Act and promised in the Americans with Disabilities Act. In addition, we continually seek ways to meet the needs of our consumers and deliver a complete array of services based on the goals of employment, community participation, and informed consumer choice. The bureau has hired a qualified, diverse, flexible and progressive rehabilitation staff to serve our current and future consumers. BRS strives toward the continuous development of desired consumer outcomes: sustained jobs, jobs with future growth, and jobs with sufficient earnings.

4. STAFF DEVELOPMENT.

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

A. SYSTEM OF STAFF DEVELOPMENT

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

BRS systematically provides adequate and ongoing training to staff. In–service training addresses assessment, vocational counseling, and job placement. All staff development activities support the bureau’s mission to increase the quality of services and the number and quality of employment outcomes for people with disabilities. In–service training is available to all staff. The bureau bases its plan for staff development on a multi–faceted comprehensive needs survey. BRS uses all available information for ongoing analysis of training needs including the following:

• Public Meetings (most recent data);

• Comprehensive Statewide Needs Assessment results;

• Rehabilitation Services Administration (RSA) 107 Review;

• Key training personnel collaboration with TACE (Technical Assistance and Continuing Education), Region 1 staff;
• Management reports; and

• Manager, district director, consultant, and supervisor feedback.

In addition to ensuring that staff meets CSPD requirements, BRS provides Foundations of CT VR, a year–long series of in–service training that is mandatory for new staff and available for staff that need refresher training. This includes a broad array of topics pertaining to VR such as: core BRS policies and practices, trainings on the specific populations, independent living, transition, and community rehabilitation services. A variety of training methods are utilized to assure that training activities are diverse enough to address individual learning styles.

Training is provided on assistive technology. BRS helped create and is a member of the NEAT (New England Assistive Technology) Center at Oak Hill. The Center is the largest assistive technology (AT) center in Connecticut where one can try AT devices for personal use, observe AT device demonstrations, donate or buy used equipment that is refurbished and recycled, obtain loans of AT devices and receive training on the latest adaptive equipment.

The Connecticut Tech Act Project director provides training and consultation for BRS staff. Other in–service trainings on specific disability populations contain information on technological solutions for consumers.

B. ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE

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

BRS continually analyzes all consumer data to identify areas where it needs to increase training or vary approaches. Acquired updated information and research is disseminated to all BRS staff by Central Office 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.

BRS addresses individual communication needs of applicants for, and recipients of, vocational rehabilitation through the services of others able to communicate in alternate languages, appropriate modes, or in native languages. Approximately 10% of the current staff is bilingual in English and Spanish. The bureau employs staff who speak other languages as well as staff who use both American Sign Language (ASL) and English. The BRS website publishes all languages that staff speaks in all three regions. The list below indicates the languages spoken by current staff and the regions in which they work:

• American Sign Language (ASL) – Northern, Southern, Western

• French – Northern

• French Italian – Southern
BRS can also hire interpreters in most languages and can access interpreter services over the phone for all languages.

Each district has Rehabilitation Counselors for the Deaf (RCD) on staff to work with individuals who are deaf or hard of hearing. These counselors are equipped with videophones. The bureau hires full–time Interpreter Assistants for its RCDs who are in need of this accommodation. BRS also contracts interpreter services through the DORS Interpreting Unit and LifeBridge Community Services.

The bureau does not serve many consumers who use Braille since there is a public Vocational Rehabilitation program through the Connecticut Bureau of Education and Services for the Blind (BESB) that serves the majority of consumers who have visual disabilities. When needed, BRS can provide Braille materials for consumers or staff. The bureau’s goal is to provide any communication support necessary for staff or consumers with disabilities.

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.

BRS co–funds an Education Consultant position with the Connecticut State Department of Education’s Bureau of Special Education who has been active in the Department of Education’s Comprehensive System of Personnel Development Council. The bureau routinely plans training with input from the Consultant in the co–funded position. This Consultant provides annual training for all bureau professional staff on Transition and other provisions of the IDEA. The Consultant also meets with the management team of BRS semi–annually to review current collaborative training and other provisions of the IDEA. This collaboration allows for coordination of the bureau’s human resource plan and personnel development under the IDEA.

J. STATEWIDE ASSESSMENT

(Formerly known as Attachment 4.11(a)).
1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

In 2013, BRS completed a Comprehensive Statewide Needs Assessment (CSNA) that examined the needs of individuals with the most significant disabilities.

In addition, relevant findings from the 2011 Medicaid Infrastructure Grant Needs Assessment including an employer survey were also reviewed.

The results of this review led to the following recommendations:

• Increase system efficiency and effectiveness;

• Increase communication and education about the nature and availability of vocational rehabilitation services;

• Focus attention on underserved consumers with hearing disabilities or autism;

• Improve cultural competency among BRS counselors and CRPs;

• Develop more effective relationships with employers; and

• Identify sources to overcome transportation barriers.

In 2015, the SRC and BRS collaborated to conduct a small survey to assess consumer satisfaction with job search services VR recipients had received during the year. As a result of this survey, the SRC recommends that BRS strengthen communication between counselors and consumers, especially when consumer cases are being transferred to another counselor. It also recommends that BRS increase engagement with businesses to increase hiring of VR consumers.

While BRS has accomplished great strides in delivering VR services effectively, the recommendations identified in these assessments offer additional goals that support the VR program as it continues helping individuals with disabilities achieve optimal employment outcomes.

B. WHO ARE MINORITIES;

In 2013, BRS completed a Comprehensive Statewide Needs Assessment Assessment (CSNA) that examined the needs of individuals who are minorities.

BRS also surveyed staff in 2013 to examine cultural competence as it relates to service delivery to minority consumers as an unserved/underserved population.
C. WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

In 2013, BRS completed a Comprehensive Statewide Needs Assessment (CSNA) that examined the needs of individuals who have been unserved or underserved by the VR program.

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

In 2013, BRS completed a Comprehensive Statewide Needs Assessment (CSNA) that examined the needs of individuals who are served through other components of the statewide workforce investment system.

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

With WIOA, students aged 16–21 in high school were surveyed regarding their needs and how to package specific services for them.

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

The CSNA assessed the need to improve community rehabilitation programs within the state. To complete the CSNA, community rehabilitation providers (CRPs), BRS counselors, consumers and key informants were surveyed. There are several areas of need to improve CRP services:

• Capacity to serve underserved populations;

• Quality of CRP staff; and

• Quality of service delivery.

BRS continually seeks CRP agencies that are able to meet the demand of serving the underserved populations, specifically Deaf and Hard of Hearing and Spanish speaking individuals. In the past, several attempts were made to encourage agencies to hire staff that is qualified to serve these individuals. The bureau created a rate differential and offered technical assistance to CRPs who wanted to expand services to these populations. Although a small number of agencies utilized these incentives, the attempt did not increase enough to meet the bureau’s needs.

Additionally, the CRP agencies continue to be challenged with hiring and retaining experienced staff to perform the core services. The bureau has put substantial emphasis on training opportunities for CRPs to help them and to strengthen the relationship with the VR counselors and the CRP staff.
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.

BRS is currently focusing on improving its ability to develop an Individualized Plan for Employment (IPE) for transition students within the 90–day deadline set by the Rehabilitation Services Administration (RSA). WIOA has established new requirements for transition services. BRS has assessed and determined the following needs of individuals with disabilities for transition career services and pre–employment transition services which include coordination with transition services under Individuals with Disabilities Education Act (IDEA):

(1) Continue to focus on decreasing the time in which IPEs are developed for transition students.

(2) Improve post–secondary school outcomes for students with disabilities ages 16–21.

(3) Maintain a Memorandum of Agreement that enables joint funding for SDE/BRS consultant position to coordinate transition services as outlined under IDEA.

(4) Design and implement a pre–employment transition service delivery model to meet the WIOA requirements.

(5) Educate community rehabilitation providers and school systems regarding pre–employment transition services.

(6) Strengthen partnerships with education stakeholders.

(7) Improve outreach to students, their families and school systems.

(8) Update and expand website resources and information.

K. ANNUAL ESTIMATES

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

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

According to the most recent US Census Bureau American Community Survey, Connecticut had 3,526,628 residents who were non–institutionalized in 2013. There were 2,226,234 persons between 18–64 years of age. 8.2% or 182,889 of these individuals had a disability (+/– 0.3 margin of error). Data from the 2013 Census also shows that Connecticut had 350,537 non–institutionalized persons with disabilities ages 16 and over, and of that number 24.5% were employed. The remaining 75.5% were unemployed.

These statistics indicate that a considerable number of persons with disabilities in the State of Connecticut are not working. A measurable number of these individuals may be transition–aged
youth. In addition, a portion of 24.5% of persons with disabilities who are employed may be underemployed. Some of these individuals may also require services to attain or retain employment consistent with their strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice. BRS is not currently in an Order of Selection. Potentially, the vocational rehabilitation program would be available to all consumers with disabilities.

These statistics make it difficult, if not impossible, to accurately estimate the number of potentially eligible consumers of VR services. That number is many times more than BRS has historically served or has the resources to serve.

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

A. THE VR PROGRAM;

For Federal Fiscal Year (FFY) 2015, BRS has served 5,443 eligible consumers in Individual Plans for Employment (IPEs) under Part B of Title I of the Rehabilitation Act. This is a 12.6% increase from FFY 2014, when 4,834 consumers received services in IPEs under Part B of Title I of the Rehabilitation Act.

BRS has remained committed to the ongoing recruitment, retention, and development of its counseling staff with qualified professionals. In FFY 2013 and 2014, BRS experienced an unexpected increase of short-term vacancies that directly impacted its ability to serve consumers. In 2014 the total number of consumers served was down 3.1% from FFY 2013. During FFY 2015 BRS enjoyed a somewhat healthier staffing pattern despite some continued attrition and short-term leaves. This improvement in staffing along with the agency’s focus on training and development has resulted in increased caseload sizes as well as an overall increased capacity to serve consumers in Individual Plans for Employment (IPEs).

BRS has also been engaged in a statewide effort to improve the timeliness of plan development for its transition-aged youth. This has included training, guidance, increased monitoring, as well as a quality assurance review process for transition cases. With these efforts, the bureau has realized improvements in the number of transition plans written as well as a reduction in the timeframes for plan development. For FFY 2015, BRS was able to write 70% of plans for transition-age youth in three months or less.

As BRS begins to implement new policies and procedures related to the Workforce Innovation and Opportunity Act (WIOA) legislation, it is anticipated that counseling staff will experience increased referrals of Pre-Employment Transition Service (PETS) consumers, transition-age youth, and consumers from our partner programs. Based on these projected increases, the bureau expects to serve 5,944 eligible consumers in Individual Plans for Employment (IPEs) under Part B of Title I of the Rehabilitation Act in FFY 2017; an increase of 9% above FFY 2015.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

During FFY 2014, BRS purchased services for 142 consumers eligible for Supported Employment funding under Title VI–B of the Rehabilitation Act, utilizing $301,706. It was projected that BRS would serve 84 consumers with Title VI–B funds with an estimated expenditure of $204,980. The
significant increase from projections was the result of the agency’s continued focus on proper identification of supported employment cases and a commitment to properly expend funding.

In FFY 2015, BRS has purchased services for 136 individuals, expending $278,551 in Title VI–B funds. These numbers are consistent with FFY 2014 performance. In combination with the 5,443 individuals who received services under Title I, BRS served a total of 5,579 individuals in FFY 2015.

For FFY 2017, the bureau anticipates that 150 individuals could potentially receive services funded under Title VI–B. In combination with the 5,944 individuals projected to receive services under Title I, the total number of individuals who could be served in IPE’s during FFY 2017 is 6,094.

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

We are not under an order of selection.

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

NA

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.

Total Title I purchase of services (POS) costs for all eligible consumers in FFY 2015 was $14 million. This figure represents a $2.2M increase over FFY 2014 expenditures. The bureau believes that two key contributing factors exist. First, BRS saw significant increases with the number of consumers applying for services, going into Individualized Employment Plans (IPEs), and receiving paid services in FFY 2015. Secondly, a significant number of transition–aged youth were funded to participate in a Summer Youth Employment Program (SYEP). The utilization of the SYEP was expanded to allow increased access with emphasis on Pre–Employment Transition (PET) consumers. Upon examining expenditure trends in POS for non–Pre–Employment Transition consumers determined to be Priority 1 and Priority 2, as well as allowing for a potentially modest expansion of costs in providing services for individuals of Priority 3 status, BRS projects to expend approximately $11.5 million in FFY 2017 on this group of consumers. In addition, BRS will expend a minimum of $2.5 million purchasing Pre–Employment Transition Services. Thus the total POS projection for FFY 2017 is $14 million. With respect to the 150 consumers projected to receive services under Title VI–B during FFY 2017, the bureau forecasts an expenditure of $269,167 in Supported Employment funding.

All Eligible Consumers Served Under Title I:

Estimated Funds – $14,000,000;

Estimated Number to be Served – 5,944

Average Cost of Services – $2,355

Most Significant Consumers Served Under Title VI:
Estimated Funds – $269,167
Estimated Number to be Served – 150
Average Cost of Services – $1,794

Totals:
Estimated Funds – $14,269,167
Estimated Number to be Served – 6,094
Average Cost of Services – $2,342

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 bureau, in collaboration with the State Rehabilitation Council (SRC), conducted a comprehensive assessment of the rehabilitation needs of people with disabilities and identified four major goal areas. These goals and priorities will be used to carry out the Supported Employment and Vocational Rehabilitation programs. The SRC jointly agrees with BRS on these goals and priorities for the coming year.

Each of the goal areas contains a set of priority areas that the bureau could address in the coming year. We cannot address every issue identified as a need, but attempted to build goals broad enough to address the major themes. Four priority areas were chosen based on their frequency of occurrence in the assessment. One additional goal was developed to address implementation of WIOA.

Goal 1: To implement the provisions of WIOA specific to the VR program.

Priority areas:

• Pre–employment transition services

• Employer services

• Service delivery

• Performance accountability measures

• Subminimum wage
Goal 2: To improve the quality of vocational rehabilitation services for individuals with disabilities.

Priority areas:

• Customer service and provision of information

• Ongoing skill development

• Use of social media

• Provision of information on resources, labor market information and training/education programs

Goal 3: To increase employment outcomes for individuals with disabilities, particularly those individuals from unserved or underserved populations.

Priority areas:

• Individuals from minority backgrounds

• Young adults with disabilities

• Individuals with psychiatric disability

• Individuals with autism spectrum disorders

Goal 4: To increase access to services for all individuals with disabilities.

Priority areas:

• Services for individuals who are Deaf/Hard of Hearing

• Services for individuals whose primary language is Spanish

• Cultural competencies for staff

Goal 5: To create effective partnerships designed to advance employment for Connecticut citizens with disabilities.

Priority areas:

• Businesses

• Community Rehabilitation Providers

• State agencies with a specific emphasis on core WIOA partners

These broad goals are intended to be five–year goals, with the priority areas being flexible enough to change from year to year if necessary.
2. IDENTIFY THE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS.

The bureau, in collaboration with the State Rehabilitation Council (SRC), identified four major goal areas. These goals and priorities will be used to carry out the Supported Employment and Vocational Rehabilitation programs.

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

The bureau, in collaboration with the State Rehabilitation Council (SRC), conducted a comprehensive assessment of the rehabilitation needs of people with disabilities and identified four major goal areas.

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

The bureau, in collaboration with the State Rehabilitation Council (SRC), conducted a comprehensive assessment of the rehabilitation needs of people with disabilities. These goals and priorities will be used to carry out the Supported Employment and Vocational Rehabilitation programs. The SRC jointly agrees with BRS on these goals and priorities for the coming year.

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

We will establish baseline measures based on 2016 data along with Core Partners.

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDING AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

BRS is currently focusing on improving its ability to develop an Individualized Plan for Employment (IPE) for transition students within the 90-day deadline set by the Rehabilitation Services Administration (RSA).

M. ORDER OF SELECTION

Describe:

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES.

BRS is not currently in an Order of Selection.
B. THE JUSTIFICATION FOR THE ORDER.

BRS is not currently in an Order of Selection.

C. THE SERVICE AND OUTCOME GOALS.

BRS is not currently in an Order of Selection.

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

BRS is not currently in an Order of Selection.

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

BRS is not currently in an Order of Selection.

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.

BRS is not currently in an Order of Selection.

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

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

BRS will continue to use supported employment Title VI, Part B funds to allow maximum options in providing services to meet individual consumer needs. The bureau will target service to those persons who are presently not served or are underserved, and who: • Are individuals with the most significant disabilities and who have previously been unable to maintain competitive employment due to the severity of their disabilities; • Are in need of ongoing support for the duration of their employment; and • Will have extended support services available beyond BRS time–limited 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

BRS maintains that given the proper supports, the majority of persons with disabilities, including those individuals with the most significant disabilities, are capable of maintaining competitive
employment. Supported employment services are available to individuals with the most significant disabilities who have been unable to maintain competitive employment because of the severity of their disabilities. The goal is to assist these individuals to achieve employment in the most integrated setting possible. Services will be provided on an individual case basis with emphasis on methods that provide maximum integration and consumer–informed choice. Therefore, BRS will continue to focus on placing consumers in individual placements with maximum integration.

The Rehabilitation Act Amendments of 1992 Supported Employment definition emphasizes “competitive work in an integrated employment setting for persons with the most severe disabilities for whom competitive employment has not traditionally occurred or for whom competitive employment has been interrupted or intermittent as a result of a significant disability and who, because of the severity of the disability, need intensive support services or extended services in order to perform such work, inclusive of transitional employment for persons with the most severe disabilities due to mental illness.”

The new WIOA changes the way Supported Employment and Extended services will be delivered:

Supported Employment • Extension of SE services timeframe from 18 to 24 months • The 50% of SE funds applies to all Youth, which includes Pre–employment Training Services (PETS).

For Supported Employment services, BRS will provide statewide training for all staff to support and empower counselors in making a shift towards more efficient plan development; in particular moving students with disabilities to plan (VR) while still exploring the potential need for Ongoing Supports.

As the need for SE is established and funding identified for ongoing support, VR plans can be amended to Supported Employment Plans. Utilization of short term plans as a means towards assuring better opportunities for transitioning youth who are expected to be in our system for longer periods of time

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.

Extended Services

• Services can be provided for a period of up to/but not to exceed four years to youth with the most significant disabilities expending supported employment Title VI funds.

• Prior to WIOA, these services were not previously permitted for youth with disabilities under VR program or Supported Employment program.

For Transition to Extended Services, BRS will work with relevant state agencies, private non–profit organizations and our other partners to transition consumers from Title VI, Part B funding to the identified provider of the ongoing, long–term support funding as soon as the funding is available and transition is appropriate. Use of Title VI, Part B funds will vary, based on the needs of the individual consumer, but will generally not exceed 24 months in length.

Transition to Extended Services
As with all bureau services, Supported Employment is designed and provided based on the individual needs of the consumer. BRS will work with relevant state agencies, private non-profit organizations and our other partners to transition consumers from Title VI, Part B funding to the identified provider of the ongoing, long-term support funding as soon as the funding is available and transition is appropriate. Use of Title VI, Part B funds will vary, based on the needs of the individual consumer, but will generally not exceed 24 months in length.

Coordination and Collaboration

BRS oversees one of the three state-funded long-term supports programs. The bureau is engaged in facilitating systemic changes in how supported employment services are delivered in the community. The bureau works with relevant state agencies, private non-profit organizations and other partners to transition consumers from the Title VI, Part B funding to an appropriate ongoing employment support program. These efforts have led to internal and external improvements in our state system and have built a foundation for a strong Supported Employment service program in this state.

O. STATE'S STRATEGIES

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES.

BRS will use the following objectives to expand and improve services to individuals with disabilities:

• Work with WIOA core partners to ensure that individuals with disabilities are effectively supported in the newly designed state employment system.

• Implement its strategic plan for delivering pre-employment transition services.

• Focus on timely progress through each step of the case management process.

• Maintain a dedicated staff resource to manage the agency’s training program and will maintain a separate training line within the agency budget that equals the level of funds available under WIA.

• Continue to use social media to connect job seekers with opportunities to pursue jobs with employers.

• Develop materials on resources, labor market information and training/education programs to post on the BRS and Connect-Ability websites to provide consumers consistent access to information.

• Continue to dedicate a specific unit of VR staff to support employers as dual customers to create more business partnerships and more employment opportunities through direct job placement, the use of On-the-Job (OJT) Trainings and Industry Specific Training and Placement Programs (ISTPPs).
• Participate in cross agency trainings through the Association of People Supporting Employment First (APSE) to strengthen state agency partnerships.

• Continue to develop and disseminated Distance Learning Modules for staff and consumer use.

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.

BRS makes Assistive Technology (AT) available to individuals with disabilities through collaboration with the Connecticut Tech Act Project (Connecticut’s statewide assistive technology program) throughout the rehabilitation process across the state in the following ways:

• VR counselors may solicit the agency’s Assistive Technology Consultant for guidance and assistance to ensure that AT devices and services are considered throughout the consumer’s vocational rehabilitation process as appropriate.

• The AT consultant can conduct comprehensive AT evaluations with consumers and can provide training in the use of newly-acquired AT, as needed.

• Through the Assistive Technology Device Loan Program at BRS, VR consumers may borrow and try out devices to help them make informed decisions about whether the AT device is appropriate and if it will remove or reduce barriers, as expected. The inventory for this program includes a wide range of devices across the AT continuum from low to high tech, across disability categories (i.e.: hearing, vision, mobility, computer access, cognitive, communication, etc.), and across potential work environments.

• VR Counselors and the AT Consultant collaborate with other entities such as school systems, colleges/universities, employers, independent living centers, state Medicaid waiver programs, and insurance plans to facilitate the provision of AT devices and services.

• The AT consultant distributes an electronic newsletter and maintains a Tech Act website to provide information about AT trends for anyone interested in AT.

• The Connecticut Tech Act Project will host a biennial full day AT Conference with a focus on AT for employment, community living and education. The 2016 conference offers 12 to 15 sessions, hands on training with specific devices and up to 30 exhibitors.

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.

BRS has targeted a number of ways to better serve minority and unserved/underserved consumers:

• Work with the bureau’s Latino Committee to develop new approaches to working with consumers who are Latino. Members of the Latino Committee and representatives the Employment Consultants will attend each other’s meetings for ongoing updates and dialogue.
• Produce all new publications in Spanish and pursue options to add required forms on the BRS Intranet for staff use.

• Implement pre–employment transition services.

• Translate distance learning modules into Spanish and American Sign Language.

• Continue to partner with Local Mental Health Authorities and the state Mental Health Department to increase the number of employment outcomes and amount of earnings for individuals with psychiatric disabilities.

• Hold three meetings of the Autism Spectrum Disorder (ASD) Committee to develop more responsive services for individuals with autism spectrum disorders. Provide joint staff training for BRS and Department of Developmental Services (DDS) staff on Autism Services.

• Conduct targeted outreach to employers to increase employment outcomes for individuals who are deaf. BRS will continue to disseminate an Interview Preparedness Tip Sheet on Deaf Culture issues to stakeholders as needed.

• Provide opportunities to strengthen cultural competencies for staff.

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).

BRS will use the following methods to improve and expand VR services for students with disabilities:

• Align existing VR services with Pre–Employment Transition Services as defined in WIOA 2014.

• Serve students with disabilities ages 16–21 enrolled in high school by providing pre–employment transition services from existing community rehabilitation providers, companies, community agencies, education entities, colleges and universities statewide.

• Assign 10 vocational rehabilitation (VR) counselors to school systems statewide to serve students enrolled in high school. Allocate 100% of their time and funding for serving students enrolled in high school.

• Improve partnerships with school systems by providing transition services to students.

• Strengthen partnerships with State Department of Education, local school systems, community providers, higher education entities, other state agencies, and employers.

• Create and disseminate effective marketing and messaging to target school systems, students and their families to educate and inform them about the BRS shift in service delivery to students as outlined in WIOA regulations.
• Continue to strengthen and broaden collaboration resources with employers, two and four year colleges and universities, WDBs/American Job Centers and DOL grant training programs for students, youth and young adults with disabilities.

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

BRS will develop the capacity of Community Rehabilitation Providers (CRPs) to meet the needs of VR consumers in the following ways:

• Continue to conduct annual performance reviews on all CRPs to ensure quality service delivery.

• Meet quarterly with CRPs in each district.

• Provide opportunities for CRPs to meet statewide, both in targeted committee meetings and at an annual forum.

• Participate in the Job Development Leadership Network.

• Continue to disseminate Distance Learning Modules focused on service delivery and fiscal process for CRPs to interact with BRS.

• Increase the number of providers who will serve underserved populations, including Deaf and Hard of Hearing and Monolingual Spanish.

• Explore procurement opportunities for specialized services.

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

BRS will work with the larger workforce investment system to set thresholds for the new WIOA performance accountability measures.

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

BRS is actively engaged in the implementation of WIOA in Connecticut with representatives on all planning committees. BRS assigned staff to participate on the four distinct planning committees to fully understand the changes WIOA would make and how VR services would be integrated:

a. Administration/Governance – development and maintenance of the MOU among state partner agencies and a regional MOU template.

b. Technology, Data, Outcomes – development of a strategy to use existing IT systems to obtain aggregate data on common customers and program outcomes.
c. Service Design and Delivery – development of strategies and models for the coordinated delivery of effective workforce system services.

d. Employer Engagement – development of a strategic plan to promote employer engagement in effective industry partnerships.

BRS will review the adequacy of existing Memoranda of Understandings with workforce boards and partners, and continue to attend workforce board meetings. BRS will also continue to seek a representative from the workforce board to serve as a member of the State Rehabilitation Council.

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

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

Along with the strategies mentioned above to address goals and ways to overcome barriers to equitable access to VR services, BRS also anticipates using innovation and expansion (I&E) funds in FFY 2017 to support the State Rehabilitation Council, the State Independent Living Council, and to continue Individualized Financial Capability Coaching, a project to increase financial literacy and capability for people with disabilities. Other proposals will be assessed upon submission and considered based on the alignment with the state’s goals and priorities.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

Along with the strategies mentioned above to address goals and ways to overcome barriers to equitable access to VR services, BRS also anticipates using innovation and expansion (I&E) funds in FFY 2017 to support the State Rehabilitation Council, the State Independent Living Council, and to continue Individualized Financial Capability Coaching, a project to increase financial literacy and capability for people with disabilities. Other proposals will be assessed upon submission and considered based on the alignment with the state’s goals and priorities.

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.

Along with the strategies mentioned above, BRS also has targeted the following ways to 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:

• Work with the bureau’s Latino Committee to develop new approaches to working with consumers who are Latino. Members of the Latino Committee and representatives the Employment Consultants will attend each other’s meetings for ongoing updates and dialogue.

• Produce all new publications in Spanish and pursue options to add required forms on the BRS Intranet for staff use.

• Implement pre–employment transition services.
• Translate distance learning modules into Spanish and American Sign Language.

• Continue to partner with Local Mental Health Authorities and the state Mental Health Department to increase the number of employment outcomes and amount of earnings for individuals with psychiatric disabilities.

• Hold three meetings of the Autism Spectrum Disorder (ASD) Committee to develop more responsive services for individual with autism spectrum disorders. Provide joint staff training for BRS and Department of Developmental Services (DDS) staff on Autism Services.

• Conduct targeted outreach to employers to increase employment outcomes for individuals who are deaf. BRS will continue to disseminate an Interview Preparedness Tip Sheet on Deaf Culture issues to stakeholders as needed.

• Provide opportunities to strengthen cultural competencies for staff.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

Describe:

1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

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

Goal 1: To improve the quality of vocational rehabilitation services for individuals with disabilities.

Priority areas:

1. Customer Service and Provision of Information

• Both the BRS and Connect–Ability websites provide information related to VR services that are updated, as needed. Staff responsible for maintaining these websites anticipate the State of Connecticut will implement a new portal platform scheduled for 2016.

• Response to Consumer Requests – During FFY 2015, BRS responded to more than 600 inquiries for information through the BRS e–mail submissions.

2. Ongoing Skill Development The bureau was awarded two five–year, in–service training grants covering October 1, 2010 – September 30, 2015. The In–Service Training Project identified two major goals:
• Goal I: To improve the skills of all BRS staff by providing training and development in vocational rehabilitation service provision, responsiveness to consumers, bureau mission and programs, awareness of state and community resources.

• Goal II: To improve recruitment and retention of BRS staff by providing career development and succession planning activities to assist counselors in defining appropriate career paths and to assist the bureau to maximize its resources, while continuing to meet CSPD requirements.

BRS provided Foundations of CT VR, a year–long series of in–service training that was mandatory for new staff and available for staff that desired refresher training. This included a broad array of topics pertaining to VR such as: Foundations of CT VR Training, trainings on specific populations, independent living, transition, and community rehabilitation services. A variety of training methods were utilized to assure that training activities were diverse enough to address individual learning styles.

The Bureau developed an integrated program of training, education, and development activities for staff to gain the necessary skills, knowledge, and experiences to improve the quality of services and the number and quality of employment outcomes for people with disabilities. This training project enhanced counselor knowledge of current VR practices and BRS policy.

Effective October 1, 2015, the Bureau maintains the above practices, and will continue them as long as funding is available. BRS will also maintain a dedicated staff resource to manage the agency’s training program and will maintain a separate training line within the agency budget that equals the level of funds available under WIA.

3. Social Media

Job seekers, employers, advocates and providers use social media to communicate and network. In order to keep pace with technological advancements, BRS added the use of Social Media as a form of communication to help consumers gain access and become familiar with online job information. BRS formed a Social Media Committee that continues to meet regularly to oversee the agency’s social media activities. The committee developed social media policy and guidance that was the basis for staff training. BRS has a presence on Facebook, LinkedIn and Twitter. Staff is encouraged to have a presence on these platforms for work–related activity only. Staff may assist consumers in developing a presence on these platforms to access information from BRS and employment information and opportunities. Consumers may be referred to the Department of Labor for LinkedIn training as well.

For federal fiscal year 2015, BRS social media activity reports the following:

a) Facebook Analytics reports we have 21 followers; this number is not enough to report residual posts from our original posts.

b) LinkedIn Analytics reports we have 193 “Connections.” BRS also used LinkedIn to post job announcements that garnered 389 views and 50 applicants.

c) Twitter Analytics reports that we have 133 followers that have enabled BRS to reach 43,992 Twitter users via tweets about the VR program and services, job openings and disability related information.
Goal 2: To increase employment outcomes for individuals with disabilities, particularly those individuals from unserved or underserved populations.

Priority areas:

1. Individuals from Minority Backgrounds

BRS initiated a Request for Applications from qualified Community Rehabilitation Providers to procure Summer Youth Employment Program (SYEP) services in an effort to give youth in high school and young adults out of school an opportunity to have summer work experiences. Particular emphasis in the procurement application was placed on serving young adults who are in the priority areas of underserved populations, including Deaf and Hard of Hearing, Monolingual Spanish speaking, Individuals with Autism and young adults with psychiatric disabilities. The procurements were awarded to agencies that would be able to serve specific geographical areas and took into account the underserved populations in those areas. The results of the procurement produced a small set of CRPs who were able to serve the capacity.

The SYEP provided work experiences to a significant number of young adults, both in school and out of school. These young adults were given the opportunity to be better prepared to gain employment, giving them work related experiences for resume building.

Training: BRS provided the following training to improve employment outcomes for unserved or underserved populations:

- Deaf Culture – different communication methods of persons who are deaf;
- Understanding Team and a Diversified Workforce – communicating appropriately with and about different groups of people;
- Ethics and Multicultural Counseling Competency – cultural issues in counseling; and
- Using the Myers–Briggs and Strong Inventories in VR – using these inventories in career counseling.

BRS also offered World of Work Inventory that provides tools for staff to use to accommodate consumers who have different levels of English, consumers with hearing loss, consumers who are visually impaired and Spanish–speaking consumers.

As a result of these efforts BRS assisted 565 Individuals from Minority Backgrounds achieve successful employment outcomes. This represents a 66% increase over FFY 2014.

2. Young Adults with Disabilities BRS has met quarterly with SDE and representatives from the Regional Education Service Centers (RESCs) to continue providing current transition information. This group now includes the Department of Developmental Services Education Liaisons and Transition Consultants.

BRS, SDE and the CT Transition Community of Practice (CT COP) have now partnered with the IDEA National Transition Community of Practice. This partnership established a Connecticut presence on the SharedWork website. It also established a core team of stakeholders and initial
practice groups that include the BRS Transition Committee and the SDE Transition Task Force. BRS continues to work with the website committee on transition resources for all stakeholders. The CT COP has adopted the National Collaborative on Workforce and Disability (NCWD) Guideposts for Success as a framework for secondary transition activities and information. This is the same framework BRS has used for Transition since 2010.

As a result of these efforts BRS assisted 311 Young Adults with Disabilities achieve successful employment outcomes. This represents a 3% increase over FFY 2014.

3. Individuals with Psychiatric Disability BRS continues to partner with Local Mental Health Authorities and the state Mental Health agency to increase the number of employment outcomes and amount of earnings for individuals with psychiatric disabilities. As a result of these efforts BRS assisted 310 Individuals with Psychiatric Disabilities achieve successful employment outcomes. This represents a 23% increase over FFY 2014.

4. Individuals with Autism Spectrum Disorders BRS held 10 meetings of the Autism Spectrum Disorder (ASD) Committee in order to develop more responsive services for individuals with autism spectrum disorders. As a result of these efforts BRS assisted 100 Individuals with Autism Spectrum Disorders achieve successful employment outcomes. This represents a 15% increase over FFY 2014.

Goal 3: To increase access to services for all individuals with disabilities.

Priority areas:

1. Services for Individuals who are Deaf BRS offers additional services, including Hearing Assistive Technology Services (HATS) and HATS Evaluation services, for individuals who are Deaf or Hard of Hearing. HATS products may be approved for purchase when required for a consumer to maintain employment, comparable devices of lesser cost have been explored, and the products are not available as a reasonable accommodation through their employer. Examples include T Coil Loops and Silhouettes, FM Systems, Amplified or Bluetooth Stethoscopes, Pocket Remotes, Bluetooth accessory adapters, and HATS products produced by hearing aid manufacturers that only work with one’s personal hearing aids. BRS has translated five of 14 distance–learning modules into American Sign Language (ASL), the remaining nine are scheduled for translation over the next two years.

2. Services for individuals whose primary language is Spanish BRS has translated five of 14 distance learning modules into Spanish, the remaining nine are scheduled for translation over the next two years.

3. Cultural Competencies for Staff BRS is committed to assisting individuals with the most significant disabilities to achieve competitive employment outcomes. Efforts have been initiated and specialized training has been offered on how to work with underserved target groups (mental health disorder, substance abuse, learning disabilities, Deafness, Autism Spectrum) has been provided, or is scheduled to be provided. Trainings are comprised of both in–person and online modules.

Goal 4: To create effective partnerships designed to advance employment for Connecticut citizens with disabilities.

Priority areas:
1. Businesses In FFY 2015, BRS negotiated 160 On–the–Job Training (OJTs). BRS also contracted with the following Industry–Specific Training and Placement Programs (ISTPPs):

- Southeastern Employment Services/Lowes Distribution Center
- Community Enterprises/Mohegan Sun
- Community Enterprises/Walgreens Retail Stores
- Ability Beyond/Walgreens Retail Stores
- Ability Beyond/Crowne Plaza
- Community Enterprises/Mystic Aquarium
- Community Enterprises/Home goods Distribution Center
- Kennedy Center/CVS Retail.

From these ISTPP partnerships, 117 individuals participated in training; 66 individuals were hired permanently upon successful completion of the training.

2. Community Rehabilitation Providers

BRS completed the CRP Distance Learning Modules created for staff in CRP agencies to understand the core services that BRS contracts with providers. The first module is a CRP overview, which is also available to the public in the Connect–Ability Website. The following modules are only available to CRP agencies: Assessment Services, Job Placement Services, On–the–Job Training, Job Coaching Services, Interview Preparedness Services and Fiscal Services. These modules are effective ways to increase knowledge about BRS services for the CRPs who traditionally have high staff turnover and lack the capacity to train new employees in a timely manner. BRS has the capability of monitoring agency participation of staff that enrolls in the training. These tools were developed in conjunction with the CRP agencies through the BRS CRP Committee.

As part of the Annual Review Process, each CRP agency reports to BRS on the staff that have taken the DL modules as well as staff who have participated in one of three BRS CRP trainings that are offered throughout the year. Four new CRPs were developed during this fiscal year.

3. State Agencies With the implementation of WIOA, BRS has collaborated with the core partners to unify the job services available for consumers seeking employment opportunities.

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

The agency did not identify factors that impeded achievement of goals and priorities.

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 goals were achieved using the following strategies:

• VR Supported Employment Foundations Training was expanded to two days for new VR Counselors. Senior VR counselors are also invited to the training to get a refresher on the current SE environment as well as provide technical assistance to the training.

• In addition, a BRS and DMHAS protocol document was developed by both agencies to provide technical assistance on Supported Employment Policy and Procedures for both agencies. Both agencies participated in a combined training for VR staff, mental health staff, CRP staff on an ongoing basis.

• Collaborative meetings were held quarterly with partners.

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

Impeding Factors for Achieving Goals and Priorities

• Consistent policies and practices in and between agencies administering Supported Employment programs continue to be a challenge for all stakeholders, including providers.

• Staff turnover is frequent and coordinating collaborative trainings and providing technical assistance is difficult. While this has been a challenging effort, training is still a priority for VR and partner agencies and providers.

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

BRS awaits the publishing of the performance accountability thresholds that will be required.

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

I&E funds were used in the following three areas:

1. Individualized Financial Capability Coaching is available to BRS consumers at age 18 who receive Social Security Benefits. Participants receive Benefits Counseling to understand the impact of earnings on benefits and an opportunity to plan for the future using the following topics and tools:

• One-on-one Financial Coaching;

• Personal Financial Education Sessions;
• Work vs Benefits Discussion;

• Goal–Setting Support;

• Help to Create a Working Budget;

• Debt Reduction Tools; and

• How to Make Tax Credits Work.

BRS funds this pilot specifically tailored to meet the needs of individuals receiving Social Security benefits through an award to the Connecticut Association for Human Services (CAHS), a private non–profit agency.

Measures of success will be based on a consumer’s improved financial literacy and his/her ability to budget a household, create realistic goals, understand credit scores (and demonstrate actions to maintain or improve them), increase self–sufficiency, obtain employment/increase wages, and go off of SSDI and/or SSI benefits. The number of new checking, savings or equivalent accounts that are opened will also be counted.

2. State Independent Living Council During fiscal year 2015, the State Independent Living Council (SILC) received $103,000 in Innovation and Expansion (I&E) funds to support the general operation of the Council. This included salaries for two full–time staff, office rent, supplies, phone and computer services, and SILC meeting expenses such as transportation, interpreter services, CART, and other accessibility costs. In addition to the administration and operation of the federally mandated SILC, staff is responsible for developing, implementing, and evaluating the State Plan for Independent Living (SPIL). The I & E funds also supported the development of the Standards of Performance for the CILs and the development of SPIL Goal 2 to expand the capacity and build sustainability for the five CILs.

Much of 2015 was spent in developing the Standards of Performance, with approval and implementation. The overarching aim of Goal 2 is to provide capacity–building and sustainability support to the CILs in order to improve the provision of IL services, pre–employment/employment opportunities for consumers, and services to unserved and underserved consumers and geographic areas. BRS has continued to support the SILC Resource Plan with I&E funding, of $103,000 in the current SPIL for FFY 2015.

3. State Rehabilitation Council The State Rehabilitation Council (SRC) received $24,350 to support efforts to assist BRS in assessing programs and services provided to vocational rehabilitation consumers. The SRC incurs travel expenses to in–state meetings and sign–language interpreters, when needed. The SRC sends a delegate to attend out–of–state conferences for the National Coalition of State Rehabilitation Councils (NCSRC) and the Council of State Administrators for Vocational Rehabilitation (CSAVR). The SRC is an organizational member the NEAT Marketplace, a Connecticut facility that provides training and support with assistive technology devices. It also supports the Connecticut Youth Leadership Project by providing funds to support its summer advocacy training program for youth with disabilities and a scholarship towards post–secondary education for a former participant. In 2015, the SRC also collaborated with BRS to engage the Center for Public Policy and Social Research at the Central Connecticut State University to conduct a consumer satisfaction survey of current and former BRS consumers.
Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES.

Include the following:

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

Program Status

BRS is allocated $255,000 annually for the Title VI, Part B Funds and expects to expend all of its allocation. The bureau continues to focus on the quality services delivered through collaborations with our state and local community rehabilitation service partners for the Federal Fiscal Year (FFY) 2015.

WIOA changes the way Supported Employment and Extended services will be delivered.

Supported Employment services:

• Extension of SE services timeframe from 18 to 24 months; and

• 50% of SE funds apply to all youth, which includes PETS.

Extended Services:

• Services can be provided for a period of up to/but not to exceed 4 years to youth with the most significant disabilities expending supported employment Title VI funds; and

• Prior to WIOA, these services not previously permitted for youth with disabilities under VR program or Supported Employment program.

For Supported Employment services, BRS will provide statewide training for all staff to support and empower counselors in making a shift towards more efficient plan development; in particular moving students with disabilities to plan (VR) while still exploring the potential need for Ongoing Supports.

• As the need for SE is established and funding identified for ongoing support, VR plans can be amended to Supported Employment Plans.

• Utilization of short term plans as a means towards assuring better opportunities for transitioning youth who are expected to be in our system for longer periods of time

For Transition to Extended Services, BRS will work with relevant state agencies, private non-profit organizations and our other partners to transition consumers from Title VI, Part B funding to the identified provider of the ongoing, long-term support funding as soon as the funding is available and transition is appropriate. Use of Title VI, Part B funds will vary, based on the needs of the individual consumer, but will generally not exceed 24 months in length.
2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

Coordination and Collaboration

BRS is engaged in facilitating systemic changes in how supported employment services are delivered in the community. The bureau works with relevant state agencies, private non–profit organizations and other partners to transition consumers from the Title VI, Part B funding to an appropriate ongoing employment support program. The bureau oversees one of the three state–funded long–term supports programs and in SFY 2012 spent approximately $1 million in serving VR consumers after VR services were completed. These efforts have led to internal and external improvements in our state system and have built a foundation for a strong Supported Employment service program in this state.

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate Bureau of Rehabilitation Services

Name of designated State agency Department of Rehabilitation Services

Full Name of Authorized Representative: David F. Doukas

Title of Authorized Representative: Director

States must provide written and signed certifications that:

1. The designated State agency or designated State unit (as appropriate) listed above is authorized to submit the VR services portion of the Unified or Combined State Plan under title 1 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA*, and its supplement under title VI of the Rehabilitation Act.** Yes

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the designated State agency listed above agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan*, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan*, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;** Yes
4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes

7. The **Authorized Representative listed above** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; Yes

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

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

**FOOTNOTES**

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**Certification 1 Footnotes**

* Public Law 113-128.

** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

**Certification 2 Footnotes**

* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

** No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

*** Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

**Certification 3 Footnotes**

* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.
**Applicable regulations, in part, include the citations in *** under Certification 2 footnotes**

**ADDITIONAL COMMENTS ON THE CERTIFICATIONS FROM THE STATE**

**CERTIFICATION REGARDING LOBBYING — VOCATIONAL REHABILITATION**

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

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

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

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

**STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE**

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

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

Applicant’s Organization  Bureau of Rehabilitation Services

Full Name of Authorized Representative:  David F. Doukas
Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

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

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

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ASSURANCES

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

1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

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

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

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

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

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:
A. THE ESTABLISHMENT OF THE DESIGNATED STATE AGENCY AND DESIGNATED STATE UNIT, AS REQUIRED BY SECTION 101(A)(2) OF THE REHABILITATION ACT.

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

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


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

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

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

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

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. No
H. THE DESCRIPTIONS FOR COOPERATION, COLLABORATION, AND COORDINATION, AS REQUIRED BY SECTIONS 101(A)(11) AND (24)(B); AND 606(B) OF THE REHABILITATION ACT.

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

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


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

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

4. ADMINISTRATION OF THE PROVISION OF VR SERVICES:

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

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

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

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

Agency will provide the full range of services described above
D. DETERMINE WHETHER COMPARABLE SERVICES AND BENEFITS ARE AVAILABLE TO THE INDIVIDUAL IN ACCORDANCE WITH SECTION 101(A)(8) OF THE REHABILITATION ACT.

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

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

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

H. COMPLY WITH THE REQUIREMENTS FOR THE CONDUCT OF SEMIANNUAL OR ANNUAL REVIEWS, AS APPROPRIATE, FOR INDIVIDUALS EMPLOYED EITHER IN AN EXTENDED EMPLOYMENT SETTING IN A COMMUNITY REHABILITATION PROGRAM OR ANY OTHER EMPLOYMENT UNDER SECTION 14(C) OF THE FAIR LABOR STANDARDS ACT OF 1938, AS REQUIRED BY SECTION 101(A)(14) OF THE REHABILITATION ACT.

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

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

   I. HAS DEVELOPED AND WILL IMPLEMENT,

      A. STRATEGIES TO ADDRESS THE NEEDS IDENTIFIED IN THE ASSESSMENTS; AND

      B. STRATEGIES TO ACHIEVE THE GOALS AND PRIORITIES IDENTIFIED BY THE STATE, TO IMPROVE AND EXPAND VOCATIONAL REHABILITATION SERVICES FOR STUDENTS WITH DISABILITIES ON A STATEWIDE BASIS; AND

   II. HAS DEVELOPED AND WILL IMPLEMENT STRATEGIES TO PROVIDE PRE-EMPLOYMENT TRANSITION SERVICES (SECTIONS 101(A)(15) AND 101(A)(25)).

5. PROGRAM ADMINISTRATION FOR THE SUPPORTED EMPLOYMENT TITLE VI SUPPLEMENT:
A. THE DESIGNATED STATE UNIT ASSURES THAT IT WILL INCLUDE IN THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN ALL INFORMATION REQUIRED BY SECTION 606 OF THE REHABILITATION ACT.

B. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL SUBMIT REPORTS IN SUCH FORM AND IN ACCORDANCE WITH SUCH PROCEDURES AS THE COMMISSIONER MAY REQUIRE AND COLLECTS THE INFORMATION REQUIRED BY SECTION 101(A)(10) OF THE REHABILITATION ACT SEPARATELY FOR INDIVIDUALS RECEIVING SUPPORTED EMPLOYMENT SERVICES UNDER TITLE I AND INDIVIDUALS RECEIVING SUPPORTED EMPLOYMENT SERVICES UNDER TITLE VI OF THE REHABILITATION ACT.

C. THE DESIGNATED STATE UNIT WILL COORDINATE ACTIVITIES WITH ANY OTHER STATE AGENCY THAT IS FUNCTIONING AS AN EMPLOYMENT NETWORK UNDER THE TICKET TO WORK AND SELF-SUFFICIENCY PROGRAM UNDER SECTION 1148 OF THE SOCIAL SECURITY ACT.

6. FINANCIAL ADMINISTRATION OF THE SUPPORTED EMPLOYMENT PROGRAM:

A. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL EXPEND NO MORE THAN 2.5 PERCENT OF THE STATE’S ALLOTMENT UNDER TITLE VI FOR ADMINISTRATIVE COSTS OF CARRYING OUT THIS PROGRAM; AND, THE DESIGNATED STATE AGENCY OR AGENCIES WILL PROVIDE, DIRECTLY OR INDIRECTLY THROUGH PUBLIC OR PRIVATE ENTITIES, NON-FEDERAL CONTRIBUTIONS IN AN AMOUNT THAT IS NOT LESS THAN 10 PERCENT OF THE COSTS OF CARRYING OUT SUPPORTED EMPLOYMENT SERVICES PROVIDED TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES WITH THE FUNDS RESERVED FOR SUCH PURPOSE UNDER SECTION 603(D) OF THE REHABILITATION ACT, IN ACCORDANCE WITH SECTION 606(B)(7)(G) AND (H) OF THE REHABILITATION ACT.

B. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL USE FUNDS MADE AVAILABLE UNDER TITLE VI OF THE REHABILITATION ACT ONLY TO PROVIDE SUPPORTED EMPLOYMENT SERVICES TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES, WHO ARE ELIGIBLE TO RECEIVE SUCH SERVICES; AND, THAT SUCH FUNDS ARE USED ONLY TO SUPPLEMENT AND NOT SUPPLANT THE FUNDS PROVIDED UNDER TITLE I OF THE REHABILITATION ACT, WHEN PROVIDING SUPPORTED EMPLOYMENT SERVICES SPECIFIED IN THE INDIVIDUALIZED PLAN FOR EMPLOYMENT, IN ACCORDANCE WITH SECTION 606(B)(7)(A) AND (D), OF THE REHABILITATION ACT.

7. PROVISION OF SUPPORTED EMPLOYMENT SERVICES:

A. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL PROVIDE SUPPORTED EMPLOYMENT SERVICES AS DEFINED IN SECTION 7(39) OF THE REHABILITATION ACT.
B. THE DESIGNATED STATE AGENCY ASSURES THAT:

I. THE COMPREHENSIVE ASSESSMENT OF INDIVIDUALS WITH SIGNIFICANT DISABILITIES CONDUCTED UNDER SECTION 102(B)(1) OF THE REHABILITATION ACT AND FUNDED UNDER TITLE I OF THE REHABILITATION ACT INCLUDES CONSIDERATION OF SUPPORTED EMPLOYMENT AS AN APPROPRIATE EMPLOYMENT OUTCOME, IN ACCORDANCE WITH THE REQUIREMENTS OF SECTION 606(B)(7)(B) OF THE REHABILITATION ACT.

II. AN INDIVIDUALIZED PLAN FOR EMPLOYMENT THAT MEETS THE REQUIREMENTS OF SECTION 102(B) OF THE REHABILITATION ACT, WHICH IS DEVELOPED AND UPDATED WITH TITLE I FUNDS, IN ACCORDANCE WITH SECTIONS 102(B)(3)(F) AND 606(B)(6)(C) AND (E) OF THE REHABILITATION ACT.

ADDITIONAL COMMENTS ON THE ASSURANCES FROM THE STATE
PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION (BLIND)

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

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

A. INPUT OF STATE REHABILITATION COUNCIL

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


Input of the State Rehabilitation Council

The State Rehabilitation Council (SRC) for the Vocational Rehabilitation Program at the Bureau of Education and Services for the Blind continues to be a valuable and active contributing partner to the Vocational Rehabilitation Program and the organization as a whole. Over the course of the past fiscal year, the Council members have participated in many activities on behalf of the Program, as well as continuing their existing responsibilities as identified in the Workforce Innovation and Opportunity Act. The following information summarizes the recommendations and initiatives of the State Rehabilitation Council and incorporates the Bureau’s response to each item.

SRC Recommendation: Have the Consumer Satisfaction Survey conducted by an entity experienced in performing consumer–based surveys and statistically analyzing outcome data.

Vocational Rehabilitation Program Response: The Bureau agreed with this recommendation. The SRC commissioned the Center for Public Policy and Social Research (CPPSR) at Central Connecticut State University (CCSU) to conduct a consumer satisfaction survey of VR service recipients for fiscal year 2014. The purpose of the survey was to evaluate the services that clients received from the Vocational Rehabilitation Program at BESB. Results of the survey found that nine out of ten clients (90%) reported that they would recommend BESB Vocational Rehabilitation Services to a friend. Similar to both 2012 and 2013 survey findings, Rehabilitation and Adaptive Equipment and Low Vision were the two most widely used BESB services. Personal Care Attendant remained the least used service. Four services experienced an increase in mean satisfaction rating, while four saw a decline in rating. Reader Services had the largest mean increase (8.67, up 1.67 in mean rating). Personal Care Attendant Services climbed to its highest rating in five years (9.0, up 1.0 in mean rating). Higher Education Services set its second–best rating in the history of the survey.
(8.7, up .9 in mean rating). This figure is only second to the all-time high of 8.86 set in 2003. Small Business Services also increased in ratings (7.14, up .39 in mean rating).

Among the services experiencing a decline in reported satisfaction, Low Vision Services saw the most sizable decrease (7.89, down .9 in mean rating). Transportation Services experienced a notable decline (7.25, down .46 in mean rating), as did Skills Training Services (8.67, down .42). Rehabilitation and Adaptive Equipment Services registered a modest decline (8.60, down .20 in mean rating). Overall satisfaction with BESB services decreased to 7.96, down .48 in mean rating. Ratings on the extent to which services met clients' IPE also saw a decline of .42 in mean rating, coming in at 7.89. Satisfaction with the extent to which services met client expectations dropped to 7.46, down .33 in mean rating. Finally, satisfaction with the extent to which services met the needs of clients decreased to 8.16, down .19 in mean rating.

The completed report was posted on the Bureau’s section of the agency website (www.ct.gov/besb).

SRC Recommendation: Based on the results of the Consumer Satisfaction Survey, implement two measureable strategies for improving on the delivery of services for clients of the Program.

Vocational Rehabilitation Program Response: The Bureau agreed with this recommendation. Based upon the high level of utilization that was identified in the Consumer Satisfaction Survey for Rehabilitation and Adaptive Equipment Services, one strategy for continuous improvement focused on this area. In consultation with the State Rehabilitation Council, it was felt that the Bureau should develop a strategy of assisting clients with the latest smart phone technology by conducting group training sessions for clients on this topic. Two training sessions occurred, one in July on the use of Android devices and the other in August on the use of iPhone devices. Both sessions were held at the Bureau’s location in Windsor, with a distance learning option being offered so clients could participate remotely if they desired.

In the category of higher education, the SRC worked to identify challenges experienced by clients of the Bureau who were attending college. Disability Coordinators at the colleges were seen as critical resources for both clients and Vocational Rehabilitation Counselors to work closely with so that it would be clear to all concerned which entity held particular responsibilities and further to ensure that clients had timely access to the necessary services. To address this, the Bureau met with 15 staff from 13 institutions of higher education in Connecticut and 1 additional staff from a college in New York to provide an overview of the services available from the Vocational Rehabilitation Program.

SRC Recommendation: Include a Vocational Rehabilitation Client Success Story into each meeting of the Council.

Vocational Rehabilitation Program Response: The Bureau agreed with this recommendation and has incorporated this as a standing agenda item for every meeting of the Council. At each quarterly SRC meeting, a current or former recipient of services attends and informs the group about how services enabled them to achieve or maintain employment. In situations where the client is not self-employed or a homemaker, their employer is invited as well to present on their experiences in working with the Bureau to ensure a successful employment outcome. The SRC membership greatly values this aspect of the meetings, as it affords members the opportunity to hear directly from clients and employers that have benefitted from services.

SRC Recommendation: Support initiatives that develop leadership qualities in transition–age youth who are blind.
Vocational Rehabilitation Program Response: The Bureau supported this important recommendation. The Vocational Rehabilitation Program as well as the State Rehabilitation Council were cosponsors once again of the Youth Leadership Forum, with 4 clients participating and 2 former client participants returning as counselor mentors. Additionally, BESB was a cosponsor of the Governor’s Coalition for Youth with Disabilities Scholarship event, recognizing the high school achievements of 3 students served by the Bureau. BESB further collaborated with Oak Hill to provide a week–long residential leadership development and mentoring camp for transition age youth at Harkness, with 8 clients participating.

SRC Recommendation: Implement the recommendations resulting from the Section 107 RSA Monitoring process to shorten the timeframe in Bureau policy for the development of Individualized Plans for Employment.

Vocational Rehabilitation Program Response: The Bureau agreed with this recommendation and actively engaged the SRC in reviewing the existing Bureau policy regarding the development of Individualized Plans for Employment after a determination of eligibility is reached. New draft policy language was proposed and subsequent to a public hearing, a new policy was adopted.

SRC Recommendation: Reinforce the priority for competitive, integrated employment by modifying existing Bureau policy to mandate that employment must be for wages that are at least the State minimum wage but also the customary wage that is paid to individuals who are not disabled, performing the same type of work for the employer.

Bureau Response: The Bureau agreed with this recommendation. This proposed policy change reflected the priorities of the Bureau as well as the State Rehabilitation Council to move away from placement options where the individual was working toward competitive wages that could potentially never be offered by the employer. With the proposed policy change, a shift to only permitting employment outcomes where the individual was earning the competitive and customary wage ensured that clients would be afforded the same level of earnings offered to their non–disabled coworkers. Subsequent to a public hearing process, this policy was changed.

SRC Recommendation: Replace SRC members whose terms are expiring with individuals who are actively interested and committed to participating on the SRC.

Vocational Rehabilitation Program Response: The Bureau agreed with this recommendation and sought candidates who were committed to serving and whose background and qualifications would satisfy particular categories for appointment to the SRC. Current and former recipients of services were also contacted by their Vocational Rehabilitation Counselors to make them aware of openings on the SRC. All interested candidates were referred to the membership committee of the SRC to initiate the process of contacting each candidate to discuss the role of the SRC and the role of the members. For candidates who then expressed an interest in joining the SRC, the membership committee forwarded their information to the Governor’s office for consideration. During the fiscal year, new appointments were made in the categories of Community Advocacy Organization and Recipients of Services. Additionally, those existing members of the SRC who were eligible for a second term of appointment were presented to the Governor’s Office for reappointment consideration. The SRC and the Bureau express their appreciation and gratitude to the Governor and his staff for the attentive and timely actions taken to process these appointment and reappointment requests.
Public Comments: A public comment period was available from December 29, 2015 through February 1, 2016 that included a public hearing on January, 21, 2016. In total, there were 10 public comments submitted. All 10 of the commenters focused on the importance of Orientation and Mobility Instruction. Six commenters specifically noted the importance of Orientation and Mobility Instruction as a component that is necessary for employment. Six commenters indicated that the current ratio of 1 Orientation and Mobility Instructor to 1,016 clients is insufficient and 6 commenters requested that at least one more Orientation and Mobility Instructor position be added. Four commenters mentioned the importance of Orientation and Mobility Instruction for independent living activities and 3 commenters noted the importance of Orientation and Mobility Instruction for children. Five commenters provided comments that referred to there being only 1 Orientation and Mobility Instructor for the entire Bureau. One commenter noted that while Vocational Rehabilitation Counselors are important, that Orientation and Mobility Instruction should be a higher priority. One commenter noted that the Orientation and Mobility Instruction that was provided to her met her needs.

In order to promote collaborative and informative discussion, the State Rehabilitation Council and the DORS–BESB Advisory Board scheduled their meetings for February 2, 2016, allowing for the members of both bodies to participate in the other’s discussions and to obtain additional information from the Bureau simultaneously.

Bureau staff clarified that the ratio of 1 Orientation and Mobility Instructor position to 1,016 clients only referred to the Vocational Rehabilitation Program, as that is the subject matter of the BESB portion of the draft Unified State Plan. The ratio is a formula that takes the total number of clients in the Vocational Rehabilitation Program and divides that by the total number of staff in each category. There are 7 Orientation and Mobility Instructors for the Bureau, with 1 assigned to Vocational Rehabilitation, 3 assigned to Children’s Services, and 3 assigned to Adult (Independent Living) Services.

Bureau staff further clarified that within the Vocational Rehabilitation Program, the actual caseload of the 1 Orientation and Mobility Instructor averages approximately 190 referred clients, but only 15 to 30 requesting assistance at any one time. The Orientation and Mobility Instructor reported that this caseload size is manageable.

SRC Recommendation: The SRC recommended that the draft Vocational Rehabilitation section of the Unified State Plan be submitted as drafted, with no changes.

Vocational Rehabilitation Program Response: The Bureau agrees with this recommendation.

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

The Bureau of Education and Services for the Blind agreed with all of the recommendations made by the State Rehabilitation Council as detailed in the above section.

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

The Bureau of Education and Services for the Blind did not reject any of the State Rehabilitation Council’s recommendations.
B. REQUEST FOR WAIVER OF STATEWIDENESS

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

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

The Bureau provides the full range of services across the entire state and does not utilize a Waiver of Statewideness.

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

Not applicable.

3. ALL STATE PLAN REQUIREMENTS WILL APPLY

requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Not applicable.

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

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

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

The Bureau of Education and Services for the Blind (BESB) is the designated state Vocational Rehabilitation unit for individuals who are blind within the Department of Rehabilitation Services (DORS), which is the designated state agency. The Commissioner on behalf of, and for the benefit of, the Bureau executes cooperative agreements at the designated state agency level.

The Bureau is in a cooperative agreement with the Social Security Administration (SSA) that makes it possible to seek and receive reimbursement for certain costs associated with clients of the Vocational Rehabilitation Program that have achieved earnings at or above substantial gainful levels and have therefore transitioned off of Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI). The process to seek reimbursement requires a combination of cooperative agreements at the state level. Client benefit status verification is obtained through an agreement with the Department of Social Services (DSS). A cooperative agreement with the Connecticut Department of Labor (DOL) makes it possible to review wage records of individuals who are participating in BESB’s Vocational Rehabilitation Program to determine if their earnings are above
substantial gainful activity (SGA) levels and would therefore qualify the Bureau to request cost reimbursement from SSA. Cost reimbursement would be for the cost of BESB purchased services as well as fees for administrative and tracking costs associated with a client’s case. In federal fiscal year 2014 BESB received $122,689 from SSA under this program.

The Bureau also is in a cooperative agreement with the Native American Vocational Rehabilitation Program in Connecticut. This agreement has been developed to help with both program’s efforts to coordinate and provide services to individuals who are mutually served by the programs or who could benefit from these services if they were to apply and meet eligibility criteria. To maximize collaboration, a representative of the Native American Vocational Rehabilitation Program serves as an appointed member of the BESB State Rehabilitation Council, and a Vocational Rehabilitation Counselor from BESB represents the Bureau on the Native American Vocational Rehabilitation Council.

The Bureau also has a cooperative agreement with the other Vocational Rehabilitation State Units within the New England Region that allows for the provision of services, such as mobility training for clients of the Vocational Rehabilitation Program who are attending training programs in those states.

For individuals who are deaf and blind, BESB works closely with the Bureau of Rehabilitation Services (BRS) for the coordination of services. Through a cooperative agreement, individuals who are deaf and blind can receive coordinated services from both public vocational rehabilitation programs. Through case conferencing, a determination is made as to which program will assume lead case management responsibilities, with the other program providing support services as needed. For clients who are receiving case management services through BRS, BESB offers vocational consultations, orientation and mobility services, and rehabilitation teaching assistance.

For clients who are blind and have developmental disabilities, the Bureau coordinates services with the State Department of Developmental Services (DDS) to bring about successful job placements with long–term supports. Each Vocational Rehabilitation Counselor works closely with DDS to establish a strong working relationship and a close collaboration of services with the DDS case manager.

BESB’s Vocational Rehabilitation Counselors also coordinate services with the State Department of Mental Health and Addiction Services (DMHAS) for individuals who are blind and have a mental health diagnosis and/or addiction.

The Bureau also is in a cooperative agreement with the state Department of Motor Vehicles (DMV) that implements a state law requiring the department to report on a quarterly basis to DMV the names of individuals age 16 and older who have been declared legally blind in each preceding fiscal quarter. The DMV uses this information to notify such individuals that their driver’s license is no longer valid.

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

Through the Assistive Technology Act, BESB works closely with the Bureau of Rehabilitation Services to provide outreach and referrals of clients who are deaf and blind so that clients who meet the eligibility requirements of the Deafblind Technology Grant can apply for and received specialized adaptive equipment to increase their access to communication.
3. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE UNITED STATES DEPARTMENT OF AGRICULTURE;

Being a part of the Statewide Workforce Development System, the Bureau of Education and Services for the Blind has access to the full range of programs carried out through the Department of Agriculture.

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

The Bureau has entered into service agreements with Almada Lodge Times Farm Camp for the provision of transition programs for in–school and out–of– school youth. Programs include mentoring, leadership development, independent living skills trainings, and work experiences as camp counselors.

5. STATE USE CONTRACTING PROGRAMS.

At the Department level, the agency participates with the Office of the State Comptroller for a Purchase Card program that permits for expedited purchasing of goods and services needed by clients to participate in the rehabilitation progress. The Department also has established a fee for service contract model with community rehabilitation providers across the state that enables BESB to purchase services at consistent pricing levels, making budget forecasting a more consistent and reliable process.

D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

1. DSU’S PLANS

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

The Vocational Rehabilitation Program at the Bureau of Education and Services for the Blind is actively involved in a variety of transition school–to–work initiatives, with extensive collaboration and coordination at the administrative and service delivery levels of the organization.

At the direct service level, Vocational Rehabilitation Counselors participate in Planning and Placement Team (PPT) meetings of clients who are in middle school or high school and assist in the development of Individualized Education Programs (IEP’s) for students. The services that are detailed in the IEP of each student are factored into the development of each client’s Individualized Plan for Employment (IPE), which must be developed within ninety (90) days of the determination of eligibility for vocational rehabilitation services, or by the time the client exits high school, whichever comes sooner. Vocational Rehabilitation Counselor involvement begins as early as age 14, with referrals to the Program initiated by the Education Consultants of the Bureau’s Children’s Services Program and Teachers of the Visually Impaired that work directly for school districts. The client is assigned to one of the two Vocational Rehabilitation Counselors that are exclusively dedicated to
serving pre–employment transition services eligible clients. Assignments are based on geographic location of the client.

Within the higher education area, the agency has successfully negotiated with the State University System to establish a cooperative agreement that addresses the services available in the university setting for students with disabilities. This cooperative agreement includes the Bureau of Rehabilitation Services and describes the responsibilities of the universities as well as the responsibilities of public vocational rehabilitation to ensure that students with disabilities achieve equal access to classroom instruction, internships, and school–sponsored activities.

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;

Vocational Rehabilitation Program staff continue to participate and present information at in–service training programs organized by the Bureau for public school teachers and guidance counselors on issues affecting students who are blind or visually impaired. The Children’s Services Program of the Bureau further provides a comprehensive training series every year for school district staff to learn about low vision aids and adaptive technology, braille instruction, expanded core curriculum activities and resources that are available to facilitate the education and transition of students served by BESB.

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

In addition to serving on the statewide transition taskforce, the Vocational Rehabilitation Program’s Educational Projects Coordinator is also an active member of the Board of Directors of the Youth Leadership Project that oversees the Youth Leadership Forum. The forum is a yearly event that teaches students with disabilities leadership and self–advocacy skills.

BESB continues to conduct career exposure camps for high school students who are visually impaired or legally blind. These programs include opportunities to interact with former recipients of vocational rehabilitation services who are successfully employed in a variety of careers. Some of these programs are held on college campuses, where the students gain a firsthand perspective of residential campus life in addition to gaining insight into a variety of careers that former clients are now engaged in.
C. ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES;

Through a cooperative agreement with the State Department of Education, the roles and responsibilities of the Vocational Rehabilitation Program and the public educational system are clearly defined. This includes financial responsibilities as well as coordination of services and staff training. To facilitate this coordination, the Transition School to Work Coordinator from BESB serves on an interagency transition task force and there is an appointed representative from the State Department of Education serving on the State Rehabilitation Council to BESB.

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

Since BESB maintains a registry of all students who are legally blind or visually impaired within Connecticut, the process for identifying and referring clients from Children’s Services to the Vocational Rehabilitation Program is streamlined and efficient. The electronic case management system for the Bureau has a built in tracking system for identifying clients by age range to further facilitate the referral of clients who desire to participate in vocational rehabilitation services. The Vocational Rehabilitation Counselors work with the students, educators, parents or legal guardians and the Program’s Education Projects Coordinator to identify careers of interest, develop career exploration opportunities, work and job shadowing experiences, mentoring activities and leadership development programs.

Through these comprehensive activities, BESB has and will continue to take an active approach to transition school–to–work activities to prepare students for the world of work.

E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

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

The Bureau of Education and Services for the Blind (BESB) uses a wide range of contractual agreements with accompanying fee schedules that have been established by the Department of Rehabilitation Services (DORS), the designated state agency for BESB as well as the Bureau of Rehabilitation Services (BRS). This provides for a statewide comprehensive set of program options and services to choose from. More than 50 non–profit community based rehabilitation programs are available through these contractual agreements for clients to select from. The services that are offered through the community rehabilitation programs in the state include job development, job coaching, and work assessments, among a variety of other training and evaluative services to enable clients to prepare for and enter into employment.

Additional fee agreements have been established with private non–profit service providers in other states where it is identified that these programs offer specific vocational and independent living services for persons who are blind. These agreements include non–profit rehabilitation providers in Louisiana, Colorado, Maryland, Arkansas, Pennsylvania, and Massachusetts, which provide work training programs as well as adjustment to blindness training.
In a contractual agreement with the National Federation of the Blind, the NFB Newsline is available for clients to access news, career information and current events. This collaboration includes the National Federation for the Blind of Connecticut, which provides funding to cover a portion of the cost for this service.

When new community rehabilitation providers become known to the Bureau, staff outreach to the provider to learn of the services that are available, and often to follow up with onsite meetings to assess the relevance of the provider’s services to the clients served by BESB. Where the new provider has program offerings that could be beneficial, Bureau staff notify the centralized contracting unit for DORS about the program so that contractual arrangements can be further explored. Upon contractual approval, the Bureau is provided with the agreed-upon fee schedule and Bureau staff are notified of the availability of the new program and the available services. BESB staff members arrange to conduct training of staff at the provider’s facility on blindness related topics such as orientation and mobility and the use of adaptive technology to ensure that programs and services are safe and accessible.

**F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES**

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency’s efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

The Bureau of Education and Services for the Blind (BESB) has been actively involved in cooperative working relationships with other public and private agencies for many years with regard to supported employment and extended services. The Vocational Rehabilitation Counselors identify individuals who have a significant disability along with legal blindness who can potentially benefit from long-term supports through supported employment. This process begins as early as middle school and high school for transition-age youth through the Counselor’s involvement in the Planning and Placement Team meetings and discussions, but it can also often occur during the adult years of clients in situations where supported employment services may be appropriate and beneficial.

The Bureau utilizes contractual agreements and fee schedules established by the Designated State Agency, the Department of Rehabilitation Services in working with community providers to purchase supported employment services prior to the transition to the provider of extended services. Typically, job coaching is the most frequently purchased service, but work assessments to establish the level of support that may be needed on the job after placement occurs are also utilized.

This Bureau continues to have an active working arrangement with the State of Connecticut, Department of Developmental Services (DDS). This cooperative agreement assists in the coordination and identification of training providers that have specific expertise when a client with a developmental disability and legal blindness could benefit from supported employment services. This working relationship also involves the utilization of the Department of Developmental Services as a long-term third party provider of funding.

In addition to the collaborative relationship with DDS, BESB has developed a working relationship with the State of Connecticut, Department of Mental Health and Addiction Services (DMHAS). Through this arrangement, individuals who have a mental health diagnosis, acquired brain injury, or
an addiction diagnosis along with legal blindness can access supported employment opportunities, with DMHAS providing the third party funding.

Beyond the collaborative arrangements for third party funding with other state agencies, the Vocational Rehabilitation Program continues to identify and work with a growing number of private Community Rehabilitation Providers throughout the state. Working relationships have been established with providers such as Goodwill Industries of Hartford/Springfield, Mindscape Industries, the Kennedy Center, Marrakech, and C.W. Resources to provide extended services to ensure the long–term stability of job placements within supported employment settings.

Staff from the Bureau participates in meetings and training seminars organized by the Association of People Supporting Employment First (APSE). This organization links community providers, employers, state agency representatives and other resources together to exchange information on job placement strategies, funding sources and employer job leads. Bureau staff have presented at meetings of this organization on blindness related topics such as adaptive technology so that other providers in attendance would be aware of the options that exist for bringing about a successful job placement when accepting a referral from BESB for a client who is seeking a job placement with supported employment services.

G. COORDINATION WITH EMPLOYERS

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR SERVICES; AND

The primary goal of coordinated activities with employers is to bring about long–term partnerships that foster a mutually beneficial relationship for both the employer and the clients served by the Bureau of Education and Services for the Blind. All staff with job placement responsibilities underwent training in job development, case management strategies and relationship development strategies through the consulting firm of Employment Management Professionals. Initially launched as a collaborative effort with the Massachusetts Commission for the Blind, the Bureau underwent further training in June, 2014 with this company. Additionally, the vocational rehabilitation counseling staff received training in motivational interview techniques to strengthen client engagement in the rehabilitation and job search process.

Under the statewide coordinated efforts of the Vocational Rehabilitation Counseling Coordinator, the vocational rehabilitation counseling staff utilizes the techniques learned in these training programs to connect employers with job seeking clients. However, a key component of the Employment Management Professionals strategy is to work with employers to develop longer standing relationships that are built on a genuine interest in the work of each employer, their needs and their priorities. This could mean that an actual job opening for a particular client may not come along for some time, but the Vocational Rehabilitation Counselor is nonetheless a resource the employer can turn to for information, referrals to other service providers, and also to learn about job site accommodations and provisions of the Americans with Disabilities Act (ADA).

Bureau staff strives to act as an employer’s placement agency, where the employer will contact the Counselor before placing job advertisements for open recruitment. If there are no clients with the
skill set to meet the particular job requirements, Bureau staff can connect the employer with other agencies or share this information at Job Developer Leadership Network (JDLN) meetings.

BESB also coordinates placement services through the National Employment Team (NET). This is a business approach of all 80 publically funded vocational rehabilitation programs working together to nationally coordinate placement services to employers that have a major presence in multiple states. The NET is a valuable resource to develop relationships with the national companies, where access to Human Resources staff at the state level is less readily available. The NET coordinator puts the businesses local human resources representative in contact with Vocational Rehabilitation agency’s point of contact. In turn, the local Vocational Rehabilitation agency point of contact and the human resources staff of the company can meet to discuss specific services or recruitment needs at the local branch level. The needed services can vary from providing job candidates for local job openings, or providing in–service training to front line supervisors on disability topics, to offering job retention assistance for workers with disabilities who have requested work site accommodations.

Within the NET, there is an employer database, referred to as the Talent Acquisition Portal (TAP), where only job seekers who are receiving services from a public Vocational Rehabilitation agency can access the portal. Employers can search for qualified candidates through this portal as well. This helps the employer recruit pre–screened qualified candidates who have a disability.

Within the provisions of the Workforce Innovation and Opportunity Act, the Bureau has been involved in new initiatives with the other partner programs to engage employers in the process of identifying how the system can best respond to their hiring, training and retention needs. A Business Engagement Partnership Forum was held in May for the purpose of hearing from employers, and to begin to develop a strategy to address their business needs. Working groups were formed to continue this effort with the ongoing involvement of staff across the partner programs.

The Bureau is looking forward to a strong and collaborative approach with the other workforce partners who engage in employer outreach, with a focus on offering employers a seamless and coordinated team approach to job order placing and matching candidates from the partner programs to the needs of the employers.

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

With the development of employer relationships, even when employers may not be immediately hiring, they can offer other valuable services such as informational interviews, job shadowing opportunities and work assessment site hosting. Company tours can further be arranged for clients of the Bureau to learn about a wide variety of careers. This is particularly important to the transition–age youth clients served by the Bureau, who may otherwise have very limited exposure to actual job sites during their junior high and high school years. Employer sites where current or former clients of the Bureau are employed have proven to be particularly beneficial in these situations. The opportunity for mentoring these young clients helps them to learn directly from another individual who is legally blind about careers in many of the occupations that provide solid earnings and long–term stability.

One such example is evident in an initiative launched by the Chair of the Bureau’s State Rehabilitation Council. As an employee of a leading employer in the aerospace industry, she successfully coordinated a mentoring event for transition–age students to spend a day at the company, touring the facility, shadowing employees and gaining inspiration by learning how the
Council Chair successfully navigated and problem–solved questions regarding work site accommodations, transportation and career development.

H. INTERAGENCY COOPERATION

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT;

The Bureau of Education and Services for the Blind (BESB) has been actively involved in cooperative working relationships with other public agencies for many years with regard to supported employment services, benefits counseling and access to public health care information for clients served by the Bureau.

Benefits Counselors from the Bureau of Rehabilitation Services are available to assist clients of this Bureau with understanding how employment earnings and public assistance benefits interact so that clients can make informed decisions regarding employment. The Benefits Counselors also explore with clients the many options that are available within the state and federal government programs including how to apply for Medicaid and Medicare, as well as health insurance under the Affordable Care Act.

One additional provision that Connecticut participates in is Money Follows the Person, a Medicaid demonstration grant that assists with the transition from institutionalized living to community living for individuals who are receiving Title XIX. A staff person from BESB has been designated to work with this program that is housed in the Department of Social Services.

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

This Bureau has an active working arrangement with the State of Connecticut, Department of Developmental Services (DDS). This cooperative agreement assists in the coordination and identification of training providers that have specific expertise when a client with a developmental disability and legal blindness could benefit from supported employment services. This working relationship also involves the utilization of the Department of Developmental Services as a long–term third party provider of funding.

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

In addition to the collaborative relationship with DDS, BESB has developed a working relationship with the State of Connecticut, Department of Mental Health and Addiction Services (DMHAS). Through this arrangement, individuals who have a mental health diagnosis, acquired brain injury, or an addiction diagnosis along with legal blindness can access supported employment opportunities, with DMHAS providing the third party funding.
I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT; DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

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

1. DATA SYSTEM ON PERSONNEL AND PERSONNEL DEVELOPMENT

   A. QUALIFIED PERSONNEL NEEDS.

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

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

   The current composition of the Vocational Rehabilitation Program includes one State Director, one Vocational Rehabilitation Supervisor, one Vocational Rehabilitation Counselor Coordinator, one Quality Control Reviewer, one Education Project Coordinator, eight full–time Vocational Rehabilitation Counselors, two Vocational Rehabilitation Assistant Counselors, one Orientation and Mobility Instructor, four Rehabilitation Teachers (two of these staff members are Rehabilitation Technologists), one Administrative Assistant, one Secretary, and three Special Assistants to the Blind.

   With this staffing level, the staff to client ratio breaks down as follows: Administrative Assistant 1/1016; Education Projects Coordinator 1/1016; State Director 1/1016; Secretary 1/1016; Orientation and Mobility Instructor 1/1016; Quality Control Reviewer 1/1016; Rehabilitation Teacher 1/508; Rehabilitation Technologist 1/508; Special Assistant to the Blind 1/339; VR Counselor/Assistant Counselor 1/102; VR Counselor Coordinator 1/1016; and VR Supervisor 1/1016.

   In terms of years of service, the breakdown for staff is as follows: 1 – 4 years of service 3/25 or 12%; 5 – 9 years of service 5/25 or 20%; 10 – 14 years of service 7/25 or 28%; 15 – 19 years of service 6/25 or 24%; and 20 – 29 years of service 4/25 or 16%.

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

   The service delivery to the clients is divided into five regions throughout the state. At least one Vocational Rehabilitation Counselor is assigned to each of the five regions. The state is divided in half (East and West) for rehabilitation technology services, with one technologist covering each region. There is currently one Rehabilitation Teacher specializing in independent living skills training and adaptive technology training with screen readers, and one Rehabilitation Teacher specializing in computer training with screen readers and/or magnification software. Each of the Rehabilitation Teachers serves the entire state.

   Also divided in half (East and West) are the two Vocational Rehabilitation Assistant Counselor caseload assignments for clients whose preferred language is Spanish.
There is one Vocational Counselor Coordinator that covers the entire state and works with the ten VR Counselors. This position is designed to work with the VR Counselors on job development activities and case management.

There is one Orientation and Mobility Instructor covering the entire state. This Instructor explores transportation options with clients who are in need of solutions to participate in training or employment. Additionally, the Instructor also provides assessments and travel training with the use of long white canes.

The service delivery model also includes one Vocational Rehabilitation Counselor who works primarily with college students. This Counselor has established close working relationships with the offices of Disability Services at the institutions of Higher Education. Through this approach, consistent coordination of support services can be achieved. The assignment of a specific Vocational Rehabilitation Counselor to the college students also ensures consistency and timeliness with the financial aid application process.

The Education Project Coordinator serves as the Program’s Transition School–to–Work coordinator, overseeing the statewide mentoring initiative, with efforts in this past year focusing on the development of mentor videos for the Bureau’s webpage. The Education Project Coordinator also is responsible for the development and implementation of programs that provide students with opportunities to work through summer employment and internships, as well as providing career exposure experiences through job shadowing, employer tours, and mentor activities.

For fiscal year 2016, plans are in place to dedicate two of the existing Vocational Rehabilitation Counselors to work exclusively with caseloads of Pre–Employment Transition–Age students. The service delivery model will have one Counselor covering the Southwestern portion of the State based on the demographic of where many of the students are located. The other Counselor will cover the remaining portion of the State. Dedicating two Counselors to work exclusively with the Pre–Employment Transition–Age students will ensure a strong focus on preparing students for careers and higher education after exiting high school.

Over the next 5 years, the Bureau anticipates there will be vacancies due to retirement and attrition in the categories of Vocational Rehabilitation Counselor and Special Assistant to the Blind. The demographic of this need is illustrated by the following description, listing the job title, current number of positions within that job title, the current number of vacancies in the job category and the projected need over the next five years.

Job Title—Total positions—Current vacancies—Projected vacancies over next 5 years:

Administrative Assistant: 1 — 0 — 0

Education Projects Coordinator: 1 — 0 — 0

State Director: 1 — 0 — 0
During Fiscal Year 2014, the Program had one vacant position. The vacant position was a Special Assistant to the Blind that became vacant in 2010. The decision was made not to fill the vacant position at this time due to competing funding priorities. The Program acknowledges that it may become more critical to fill this position in the future if the demographic of the field staff shifts beyond the current ratio of four field staff that are legally blind to three Special Assistants to the Blind.

It is projected that within the next five years, the need for Vocational Rehabilitation Counselors due to attrition and retirement will be four. It is further anticipated that the Program may expand to add one additional Vocational Rehabilitation Counselor to serve a regional caseload. The new position would be established to offset the reassignment of two current staff to work exclusively with students with disabilities that meet the definition for eligibility to access Pre–Employment Transition Services reserved funding. As the Program implements the provisions of the Workforce Innovation and Opportunity Act associated with the emphasis on serving students with disabilities, the realignment of staffing to serve these individuals beyond what has traditionally occurred prior to the passage of the law becomes more critical. Dedicating specific staff to exclusively serve this client population will address this need.

With the relatively high starting salary for Master’s level Rehabilitation Counselors compared to the private rehabilitation sector within the state, it is anticipated that recruitment efforts would again result in a sufficient applicant pool of qualified individuals when a Counselor vacancy occurs or a new position is established. The Program recruits for individuals who meet the highest standard in the state (CRC eligibility) first. The competitive salary offered by this Bureau has resulted in the ability to hire individuals who possess this level of credentialing in most situations. If there are no qualified candidates from those recruitments, then recruitment will be made for a Vocational Rehabilitation Assistant Counselor level.

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;

Central Connecticut State University, Masters in Rehabilitation Counseling

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

The Vocational Rehabilitation Program monitors the number of students enrolled in Masters of Rehabilitation counseling programs at colleges throughout the region by contacting the educational institutions to ensure that there are sufficient numbers of candidates to address future anticipated recruitment needs. In the past year, Assumption College in Worcester, Massachusetts had 86 students enrolled, with 32 recently graduated. Central Connecticut State University in New Britain, Connecticut had 91 students enrolled with 25 recently graduated. The number of Masters of Rehabilitation Counseling degree candidates is sufficient to address the projected recruitment needs over the next fiscal year.

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.

Central Connecticut State University graduated 25 students with Masters degrees in Rehabilitation Counseling and Assumption College graduated 32 students with Masters degrees in Rehabilitation Counseling.

2. PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

The Vocational Rehabilitation Program remains in contact on an annual basis with all of the institutions of higher education in this region that offer Master’s degree programs in Rehabilitation Counseling to ensure that an adequate flow of graduates is anticipated for projected vacancies. When positions are available, recruitment efforts are conducted through job announcements that are placed on the Department of Administrative Services web site, news publications of minority–based organizations, and colleges in the area. The Program also distributes the job vacancy announcements to organizations of and for individuals who are blind within the state, as well as advertising nationally through Rehab Net, which is a list–serve that connects all 80 public vocational rehabilitation agencies. The list–serve for the National Council of State Agencies for the Blind (NCSAB) is also utilized to distribute job announcements to ensure the widest possible distribution.

Within the past year, the Bureau has also reached out to Goodwin College to arrange to speak with students in their human services classes at the bachelor’s level in an effort to increase awareness of the field of Rehabilitation Counseling, with the goal of encouraging students to consider graduate
work in this field. Beyond this outreach activity, the Bureau also worked with Springfield College, Central Connecticut State University and the University of Massachusetts to host graduate level interns at the Bureau for the new fiscal year. Two interns are scheduled to do their field placements within the Vocational Rehabilitation program and the third intern’s field placement will be in the Children’s Services program during fiscal year 2015.

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

All staff members working as Vocational Rehabilitation Counselors and the Vocational Rehabilitation Supervisor at the Bureau of Education and Services for the Blind meet the Comprehensive System of Personnel Development. These staff members meet these requirements by having a Master’s Degree in Rehabilitation Counseling or a closely related field, as specified by the criteria for certification as a rehabilitation counselor by the Commission on Rehabilitation Counselor Certification (CRCC). In addition, the State Director for the Vocational Rehabilitation Program also meets the CRCC standard and holds the credential of Certified Rehabilitation Counselor.

There are two staff members that do not meet the Comprehensive System of Personnel Development requirements of a Master’s Degree in Rehabilitation or a closely related field. As specified in Bureau policy, the Vocational Rehabilitation Supervisor, who meets this standard, approves all eligibility decisions, Individualized Plans for Employment, and case closures for these two staff who are both in the job title of Vocational Rehabilitation Assistant Counselor.

There is no requirement in the job specification of the Vocational Rehabilitation Assistant Counselor series to advance into the Counselor level. However, staff hired into the job title of Vocational Rehabilitation Assistant Counselor are encouraged to pursue continuing education to meet the qualifications of the Vocational Rehabilitation Counselor level. This strategy has proven to be successful. One of the current staff did pursue this option, acquiring a Master’s Degree in Rehabilitation Counseling through the Region I Continuing Education Grant, and subsequently applied for and was promoted into the Vocational Rehabilitation Counselor level position. In the past year, he moved into a higher level position of Vocational Rehabilitation Counseling Coordinator.

The most recently hired Vocational Rehabilitation Assistant Counselor is currently participating in the Master’s in Rehabilitation Counseling program at Central Connecticut State University. The anticipated date for completion of the program is 2016.

Working with the Department of Labor and the One–Stop Centers and their regional partners, Vocational Rehabilitation staff will be participating in training seminars on the needs of employers within the state, to better prepare staff in working with clients to meet the needs of the employer community. This will include training to learn of the credentials required for careers in demand, the
universities and training programs that offer these degrees and credentials, and the adaptive technology considerations that must be taken into account to enable individuals who are blind to access these training curricula and the job tasks.


With the passage of the Workforce Innovation and Opportunity Act (WIOA), new opportunities for collaborative training with other partners of the workforce system are emerging within the state. The Bureau will be working in partnership with the State Department of Labor and the State Department of Education to identify training opportunities that Vocational Rehabilitation staff can participate in on labor market projections and career forecasting, employer engagement strategies, and skill requirements for high growth job opportunities in the state. Additionally, the Bureau will work with the One–Stop partners in each of the regions to identify training workshops available to staff from partner programs on topics such as accessing services from training providers, including apprenticeship opportunities and certificates from post–secondary occupational schools.

4. STAFF DEVELOPMENT.

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

A. SYSTEM OF STAFF DEVELOPMENT

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

The Vocational Rehabilitation Program makes available a full range of training programs offered through public and private entities. Program staff members are encouraged to identify training areas of particular interest for their individualized professional development in addition to the Bureau identifying programmatic training categories for staff to participate in.

Vocational Rehabilitation Counselors work directly with their supervisor to identify areas for professional growth and development each year. Each employee of the Program receives at least one written evaluation per year, which is consistent with collective bargaining agreements. The Supervisor of the Vocational Rehabilitation Program meets with staff members regularly to assist with any areas of their job performance that could benefit from further development and to provide feedback on best practices that have proven to be effective in service delivery. Technical assistance on policies and procedures is also provided during individualized meetings and during staff meetings. If an employee is found to need additional assistance and training in order to meet the job requirements, then a plan for improvement is developed. This may include the use of weekly reviews, additional written performance evaluations, and increasing the opportunity for the employee to participate in formalized training programs to increase skills and competencies.
Assistive Technology continues to be among the highest training priorities for staff in Vocational Rehabilitation, particularly since adaptive equipment is so often a component of success on the job for clients served by the Program. One of the Rehabilitation Technologists attended a national conference on technology at California State University at Northridge (CSUN). The other Rehabilitation Technologist attended the National Assistive Technology Industry Association (ATIA) conference. The Rehabilitation Technologists bring back all the information they learned and provide an in–service training to Program staff on the latest technology available to individuals who are blind.

The two Rehabilitation Teachers who provide adaptive technology training to clients took part in trainings on accessible applications and features for the iPhone and Android devices. Several Vocational Rehabilitation Counselors also participated in these training sessions. Additionally, eight staff attended the statewide conference “Achievement Through Technology” with the two Rehabilitation Technologists presenting a workshop session on adaptive technology for people who are blind.

Additionally, online training programs have been utilized on such topics as how to fund adaptive technology, making web pages accessible and JAWS for Windows with Math.

The Vocational Rehabilitation Counseling staff, the Supervisor and the Director all participated in a refresher course that was first delivered in fiscal year 2006 on employment outreach strategies that engage employers in the job development process. Originally delivered as part of a two–state initiative with the Region I Technical Assistance Center and the Massachusetts Commission for the Blind, this training taught new approaches to job development through effective long–term relationship building with employers and a technique for time management. Vocational Rehabilitation Counselors also attended a training on motivational interviewing strategies to increase the Program’s focus on client engagement in services.

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.

Information on best practices in other state vocational rehabilitation programs as well as evidenced based research and practices is disseminated to staff of the Vocational Rehabilitation Program to help them remain current with trends and strategies. Most noteworthy are the recent developments with transition age youth and the programs that have been developed across the country to increase access to leadership development, mentoring and summer employment.

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.

There are two Vocational Rehabilitation Assistant Counselors who are bilingual in English and Spanish, and who work with Spanish–speaking clients throughout the State. Part of their duties includes outreach to community–based organizations to distribute information about services offered by the organization. The Bureau also provides information to clients in large–print, Braille, electronic, and audio formats to ensure that materials are accessible. Bureau staff can also utilize contracted
translation services to communicate with clients in other languages. Through the Deaf and Hard of Hearing unit at the Bureau of Rehabilitation Services, interpreters for the deaf are available, including tactile interpreters for clients of the Bureau who are deaf and blind and whose preferred mode of communication is through sign language.

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

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

Collaboration through the Individuals with Disabilities Education Act (IDEA) occurs on a continual basis through joint training programs and initiatives. Staff members from Vocational Rehabilitation have participated in transition work groups including the Transition Taskforce that is facilitated by staff from the State Department of Education. There is also a Community of Practice group that focuses on best practices and emerging trends in transition services to youth with disabilities. This multi–agency initiative includes representatives from this Bureau as well as the State Department of Education, the Department of Mental Health and Addiction Services, the Department of Developmental Services and the Bureau of Rehabilitation Services.

With the passage of the Workforce Innovation and Opportunity Act, there is increased emphasis on providing career development services to youth with disabilities prior to high school completion. The Bureau is developing strategies to address these priorities for eligible and potentially eligible individuals. Training in the components of the new law and how it will be implemented within the Bureau has already begun and will continue into the new fiscal year.

J. STATEWIDE ASSESSMENT

(Formerly known as Attachment 4.11(a)).

1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

The State Rehabilitation Council to the Vocational Rehabilitation Program for individuals who are blind commissioned the Center for Public Policy and Social Research (CPPSR) at Central Connecticut State University to conduct a comprehensive statewide needs assessment in fiscal year 2015 to assist the Bureau with establishing goals and priorities. The full report as issued by CPPSR appears immediately below. The Council has utilized the findings and recommendations within this document to assist with the development of goals, objectives, strategies and measures for the upcoming state plan.

CPPSR Full Report:
I. Overview

In accord with the Rehabilitation Act of 1973, the Bureau of Education and Services for the Blind (BESB) is required to conduct a needs assessment of individuals with disabilities living within the state. This needs assessment complies with the evaluative objectives outlined in the Comprehensive Statewide Needs Assessment (CSNA) Guide dated November 30, 2009. As noted in the Guide, this analysis is valid for three years. In conducting this analysis, Central Connecticut State University’s (CCSU) Center for Public Policy and Social Research (CPPSR) gathered information from consumers, an advisory council, the Internet, and Vocational Rehabilitation (VR) staff.

II. Methodology

In conducting the assessment, The Center for Public Policy and Social Research examined and/or conducted:

• An analysis of population statistics for Connecticut that describe disability and minority status;

• A description of VR participation rates of minority individuals in comparison to individuals in the overall population in Connecticut and to national VR statistics;

• An analysis of VR services to individuals with the most significant disabilities,
• An analysis of Bureau improvements since the previous VR assessment;

• The results of a teleconference focus group discussion held with the Bureau Consumer Advisory Committee (conducted January 2014);

• The results of the consumer satisfaction survey for individuals served during Fiscal Year (FY) 2013;

• Comparative longitudinal data analysis based off of the consumer satisfaction survey from FY 2003–2013;

• The results of one in–depth interview with a Bureau Consumer Advisory Committee member;

• The results of three in–depth interviews with BESB Vocational Rehabilitation counselors (conducted April 2014).

III. Clientele Summary

A. Overview

At the end of fiscal year (FY) 2011, BESB’s registry comprised of 10,942 visually impaired individuals (footnote 1). The Bureau’s registry for FY 2012 accounted for 10,735 visually impaired individuals, revealing that their clientele decreased by 1.8% (footnote 2). Data for FY 2013 further show a registry increase of approximately 2.7% to 11,034. No reliable state blind population statistics are available at this time. Therefore, it is difficult to ascertain whether this recent registry increase indicates growth within the visually impaired community or success on BESB’s behalf at identifying more of its potential clientele.

B. Minorities

According to the U.S. Census Bureau’s 2012 data, predictions based on 2010 Census findings, Connecticut’s minority population is slightly less representative than that of the national population. Approximately two–fifths of all Americans (38.9%) self–identified their ethnicity as part of a minority group. Of those individuals who associated with one ethnicity, 16.9% were Hispanic or Latino, 13.1% were African American, 5.1% were Asian, 1.2% were Native American, and 0.2% were Pacific Islander (footnote 3). Slightly off of national statistics, approximately one–third (32.3%) of Connecticut survey respondents identified themselves as a minority (footnote 4). In order of frequency, state minorities are accounted for as follows: 14.2% Hispanic/Latino, 11.2% African American, 4.2% Asian, .5% Native American, and .1% Hawaiian/Pacific Islander (footnote 5).

Comparing BESB, state, and national statistics, we find that the Bureau’s Vocational Rehabilitation program appears to be successful at engaging Connecticut’s visually impaired minority community. Overall, Bureau clientele enrolled in the VR program who self–identify their ethnicity reasonably reflect both the state and national minority population at approximately 34%. Sub–groups are similarly represented. For fiscal year 2012, BESB reported the following of program enrollment: 19% African American, 12% Hispanic/Latino, 2% Asian, and less than 1% Native American/Pacific Islander (footnote 6). As noted in the overview of the Clientele Summary, participation in BESB’s Vocational Rehabilitation program has decreased by approximately 1.5% between 2011 and 2013 (footnote 7). Notably, minority enrollment in the program remained steady during this time. This indicates that while the overall registry enrollment has dropped, outreach to minorities with visual disabilities has remained consistent. Currently, there is no reliable data that measures the incidence
of blindness in minority communities within Connecticut. For this reason, the Needs Assessment approximates information based on general minority population statistics.

Since the last VR assessment was issued, BESB has taken numerous steps to improve its outreach to the minority community. BESB employs two bilingual counselors and pays for interpreters on an "as needed" basis. BESB also continues outreach to specific minority groups through local meetings and events. Such outreach efforts include attending the Puerto Rican Forum and working with other agencies that offer ESL (English as a Second Language) classes (footnote 8). Given the information, CPPSR concludes that BESB has made successful efforts in reaching out to underserved populations. Towards the end of this report, suggestions to further assist in outreach efforts have been provided.

C. Youth

Reporting practices vary, so it is difficult to compare BESB’s success at reaching minority and child populations with other states. For example, many agency websites do not divulge statistics for race, ethnicity, or age. Despite the lack of comparative data, it is possible to assess how BESB is doing within its own state. We conclude that BESB is actively engaging blind youth in the State of Connecticut. In fiscal year 2011, the Bureau’s registry accounted for 10,942 blind individuals. Out of that number, 1,074 were children. The 2012 report reveals that 1,123 out of 10,735 individuals on BESB’s registry were children. This reflects a 3% increase in their enrollment. While the registry grew 2.7% in FY 2013 (totaling 11,034), the number of children decreased to 1,100 (footnote 9). This represents a drop of less than 1%. The amount of children served since the last Assessment saw a statistically insignificant increase of .09%. This adds a net of three children since the end of fiscal year 2010. While it is difficult to determine the reason behind the fluctuation of children registered with BESB simply by looking at numbers, a possible explanation is that some children entered adulthood.

IV. Vocational Rehabilitation Outcomes

This section compares Connecticut’s Bureau of Education and Services for the Blind outcome data with those from other peer agencies. These data were derived from the U.S. Department of Education’s Rehabilitation Services Administration (RSA) 911 Ad Hoc Query feature. Information is from the most recent RSA reporting (FY 2012). Looking at a variety of metrics, BESB’s measured outcomes are very competitive with peer agencies.

Compared to peer agencies with similar grant amounts received for FY 2012, BESB ranked the highest for closing cases based upon favorable employment outcomes (88.8%, footnote 10). Of the 6 peer state agencies included in this particular comparison, Oregon ranked second at 78.13%, Iowa and South Carolina tied for third (77.88%), Arkansas fifth (73.99%), and New Mexico sixth (53.03%). Another metric that can be used to evaluate BESB’s VR program is to compare the Bureau’s outcome data to peer agencies with similar amounts of individuals served. BESB served 125 new clients in FY 2012. Other agencies serving numbers of clients closest to this figure include Minnesota (159), Oregon (128), Idaho (106), and Iowa (104). BESB reported the highest positive employment outcome percentage in this cohort by over ten percentage points (10.67%, footnote 11). Among peer agencies, as measured by both grant funds received and the number of clients served, Connecticut’s Bureau of Education and Services for the Blind leads in positive employment outcomes.
While BESB is highly competitive in most measures presented in the RSA data, one area stands out as being a place to improve the services offered. This comes in observing the average hours per week in which clients are employed. Looking at reported outcomes for agencies that exclusively serve blind populations, the average is 26.48 hours per week worked (footnote 12). BESB sits right at this mean. Using the median, a more precise measure of central tendency given the outlier of Maine (10.33), we find that BESB falls just below the middle point of the data (28.17). The unfortunate fact is that Connecticut has the 39th highest unemployment rate in the country (footnote 13). This undoubtedly contributes to the Bureau’s difficulty in locating and obtaining full–time opportunities for their clients. However, when BESB does place VR clients in positions, these individuals make highly competitive salaries. Among all 24 states that isolate the reporting of blind agency data outcomes, BESB is second in the nation with an hourly wage of $16.24. This figure is $3.54 above the average for this agency cohort. Washington leads this grouping with an average hourly wage of $17.03.

The Bureau stands out when examining the average time to case closure with no employment. BESB leaves cases open for an average of 95.30 months, a true outlier. Isolating reported outcomes for agencies exclusively serving the blind population, a cohort of 24 states, the statistical average for this metric 46.72 months. Qualitative data offer some insights as to why BESB’s figure is comparatively high. Some clients who enter the VR program are unprepared for employment. For example, some of these individuals are adjusting to life as a newly blinded person. These individuals may not aggressively seek employment for an extended period of time. These cases are typically left open. Further, VR counselors report an unconditional desire to never give up on a client. These insights are statistically corroborated by BESB’s low percentage of cases closed without employment. Looking at the 24 states that isolate data for agencies exclusively serving the blind population, the Bureau has the lowest percentage of cases closed without unemployment (11.2%). Notably, this figure is just shy of 20 percentage points below the average for this cohort (31.18%).

Financial efficiency is extremely important in today’s economic climate. We find the Bureau to be extremely efficient with its funds. BESB spent an average of $5,603 on each client with a positive employment outcome. This measure of efficiency is sixth in the nation among the 24 state cohort referenced above. Looking at this same peer grouping, BESB spends the highest amount of dollars on cases closed with no employment (average of $14,249.07). This figure is substantially above the mean ($7,437.268).

Bureau employment outcomes reported to the RSA correspond to customer satisfaction survey results. Central Connecticut State University’s Center for Public Policy and Social Research has collected longitudinal data on client attitudes towards services rendered by BESB. The results typically yield a margin of error of +/−5 at the 95% confidence interval. In fiscal year 2013, more than nine out of ten survey respondents (91%) reported that they would recommend BESB to a friend (footnote 14). Since the last time this assessment was conducted, the Bureau reached its all–time high on this valuable measure. The results for fiscal year 2012 revealed that 94% of clients surveyed would recommend BESB to a friend.

Overall, Bureau clients that participated in the survey reported high levels of satisfaction across all services. On average, BESB clients reported higher levels of satisfaction with services compared to 2012. Five services enjoyed an increase in mean satisfaction rating. Only three services experienced a decline, all of which were modest downturns. These findings continue the general positive trend set in 2012. In 2013, Low Vision and Skills Training services, for example, both experienced notable increases in satisfaction from the previous year’s survey. The mean satisfaction score for Low Vision Services improved from 7.72 in 2011 to 8.79 in 2013 (footnote 15). Skills
Training Services’ mean score increase from 7.96 in 2011 to 9.09 in 2013. This represented the highest satisfaction mark out of all of BESB’s services in 2013.

V. Focus Group Summary

As part of the Comprehensive Statewide Needs Assessment, the Center for Public Policy and Social Research conducted a focus group with members of the Bureau Consumer Advisory Committee (BCAC). This focus group was conducted within the context of a BCAC teleconference business meeting held in January of 2014. The purpose of this focus group was to understand how BCAC members felt about BESB services, needs that should be addressed in the near future, and how BESB could increase outreach efforts to the unserved and underserved. Given that BESB’s Director was involved in the teleconference, Advisory Committee members seeking greater confidentiality were encouraged to call the Principal Investigator at a later point in time. One individual took advantage of this offer. It is worth noting that these qualitative findings cannot be generalized beyond the BCAC membership. Still, they provide valuable insight into how a group of select consumers and agency affiliates view BESB’s operations.

The chief concern that emerged from the focus group revolved around the topic of access to technology. Multiple BCAC members talked about the importance of getting technology to older adults. They felt that the concentration of technology training has been geared towards people who are going into the workforce or are currently employed. An increasing number of older adults are interested in using computers at home. However, these individuals are missing both the adaptive technology and the skill set needed to use that equipment. The Committee stressed that technology is a critical tool for independence. Clients have the ability to receive needed goods and services that are otherwise difficult to obtain. Provided example included online grocery shopping and access to online vendors such as Amazon. One client suggested that there is a large population of older people living alone. Access to online services is particularly important for this age group.

A second concern was the issue of unreturned phone calls. One focus group participant mentioned that certain staff members return phone calls right away, while others do not return their calls. As a result, clients end up calling supervisors. This strategy puts an additional strain on the Bureau’s management team. The Director of BESB mentioned that messages left on direct lines cannot be tracked. He can only identify calls that come in via the main switchboard. This means that the Bureau currently has no mechanism to confirm if calls were received and/or returned. CPPSR offers some suggestions to address this issue in section seven of this report.

A third concern is improving outreach to underserved populations. One individual referenced the demographic influence that Connecticut’s two casinos have had on the Southwest region of the State. Language barriers may hinder outreach efforts. For example, there is a growing Haitian population in Connecticut that speaks French Creole. Furthermore, one BCAC member highlighted the importance of recognizing cultural barriers. Some cultures tend to deal with disabilities within the family, a concern that was reaffirmed by CCSU in an interview with one of the VR counselors. VR Counselors should be knowledgeable about—and sensitive to—how certain cultures view disability.

Finally, focus group participants expressed a need for a job placement specialist. The group was informed that a Counselor Coordinator was hired in October of 2013. This hire will be responsible for helping people get jobs and needed services. Mr. Richmond, the incumbent, should be instructed to engage federal partners when they have job openings. He should also help clients who have given up on finding employment. Further suggestions about how to best use the Counselor Coordinator are offered at the conclusion of this report.
It is worthy of mention that BCAC members were very complimentary of BESB’s services. While not specifically related to VR, one individual praised the Bureau for helping with general daily skills. This client has learned basic organizational skills, cooking skills, and alternate ways to deal with day-to-day tasks. CRIS Radio, a collaborative partner of the Bureau, is thankful that counselors are informing clients about their service. It is estimated that 90% of new applications come from BESB referrals.

VI. VR Staff Interview Summary

In April of 2014, CPPSR conducted semi-structured, in-depth interviews with three counselors working in BESB’s Vocational Rehabilitation division. The VR employees who participated in the interview process made several recommendations. CPPSR is presenting these recommendations in a broad context to help BESB identify actionable solutions:

Finding 1: VR counselors are responsible for a diverse range of time-sensitive tasks. Some of these tasks are clerical responsibilities that take away from quality casework time. Bill paying tasks were cited as being particularly time consuming.

Solution: We suggest that the Counselor Coordinator adapt an “open door policy” to assist counselors with identifying priorities. We also suggest developing a college internship program to help with BESB’s day-to-day operations. This would allow additional time for counselors to focus on getting their clients jobs.

Finding 2: Counselors expressed interest in being more integrated into the agency’s policy-making process.

Solution: Our findings suggest that management values the expertise of its VR counselors. We suggest that management verbally reaffirm this position to its staff. We also suggest that, when possible, that the leadership continue to engage the counselors in the policy brainstorming and implementation processes.

Finding 3: Counselors are concerned that clients call management as a means of overriding their decisions. A unified front should be presented in these scenarios.

Solution: Utilize middle management, specifically the Counselor Coordinator, to deal with these situations. When a client calls management, that call should be redirected to the Coordinator. This person should then meet with the counselor to come up with a mutually agreeable solution. This approach would help establish a greater sense of teamwork among the staff.

Finding 4: One counselor expressed that he/she did not feel technologically mobile, especially during the client intake process. This person reported not having access while “on the go.”

Solution: A separate finding suggests that technology requests from VR counselors are taken seriously and usually approved. Management should verbally reaffirm this position. We suggest that the Director convene a meeting focused on technology. Counselors should be encouraged to discuss what technology they see as being necessary. If technological gaps are ultimately identified, management should work to fill them.

Finding 5: One counselor expressed frustration over not being able to accept electronic signatures from clients. This counselor reported driving a long distance just to secure a signature.
Solution: A separate finding suggests that BESB can accept electronic signatures from clients. This position should be reaffirmed to VR staff members.

Finding 6: Counselors find the new case management system frustrating. A common report states that the system’s built-in authorization process is cumbersome and time consuming.

Solution: Offer this feedback to appropriate decision-makers in the Department of Rehabilitation Services. Encourage the DORS leadership to make the system more user-friendly.

VII. Further Recommendations

Based on the data collected for this Assessment, CPPSR has a few recommendations for improving the VR program. First, we have some broad suggestions on how to improve agency outreach. CPPSR sees social media as a valuable way for the Bureau to extend its name recognition and knowledge of services offered. As state law permits, CPPSR suggests setting up and maintaining a Facebook account. There is no charge to establish an account. The Bureau could then post regular announcements regarding special events and outreach efforts. By “ friending” other agencies or business-oriented networks, the Bureau may come to learn of new outreach opportunities. We also recommend, as state law permits, that BESB create a series of YouTube videos. These videos could highlight BESB’s mission, available services, and client success stories. These videos could be posted on the BESB website and Facebook page. Links to the videos could also be distributed via e-mail. If someone calls BESB wanting to learn more about the Bureau’s mission, video links could serve as valuable promotional material. Clients could also participate in making videos and share their personal stories about the Bureau. We realize that some of the decisions regarding the use of social networking platforms rest with the Commissioner of the Department of Rehabilitation Services. It is our suggestion that the Commissioner consider the Bureau as a test case for social media outreach. We find that both VR staff and the Bureau’s management team are interested in utilizing digital technology.

Activating LinkedIn accounts for VR counselors was a positive first step. Continued advancements should be investigated, especially in light of the Bureau’s enthusiasm towards integrating this new technology. Along the lines of digital technology, we recommend that the BESB website be improved. The website is unorganized and visually unappealing. This could discourage potential consumers, as well as potential employers, from pursuing a relationship with the Bureau. Having a strong digital presence is important in today’s technological age. Should the BESB pursue this suggestion, it is critical that the Bureau conforms to the standards adopted by the State of Connecticut Website Accessibility Committee (WCAG A, footnote 16). We suggest that documents and reports should be organized with clear headings. We also recommend having headings on the home page targeted to specific populations. For example, “Information for Consumers” or “Information for Employers” would offer website visitors some direction. If the Bureau is in a position to pursue social media outreach, including that information on the website would be extremely valuable.

CPPSR finds great merit in the newly instituted college mentorship program. This is a positive development that may ultimately assist students in important career trajectory decisions. Interviews with VR staff members highlighted some potential improvements to the program. Instead of starting the mentorship program during a client’s freshman year, establish the mentor/mentee relationship one year earlier. The junior or senior year of high school would be ideal. The mentor could then assist with critical decisions such as what college/university to attend and navigating the first day of school. Capturing the transition period from high school to college would maximize the value of this
new program. This same mentor may then assist the student with career questions as they prepare to transition to post–college life.

Also in the realm of higher education, we suggest that the Bureau consider establishing an internship program with local colleges and universities. Students majoring in social work, sociology, and political science may have interest in gaining real–world experience at the Bureau. Many departments housed in Connecticut’s state university system have internship coordinators. This individual is a valuable point–person for connecting the Bureau with students. Students could work for either a semester or, more ideally, an entire academic year. We see an internship program as a valuable pipeline for addressing some long–standing concerns that BESB has been facing. One prominent example is the issue of phone calls going unreturned. CPPSR is not aware of any technology that could serve as an immediate fix to this dilemma. Consequently, we suggest that the Bureau turn to the power of people. College interns could assist with the day–to–day operations of BESB. This could include things such as helping with billing paperwork, tracking phone calls, and directing clients to the appropriate staff member. We realize that part of the difficulty with addressing these needs comes in training new workers. If BESB could secure interns for an academic year, this training would be worth the time investment. Many internship programs base themselves on a “for credit only” arrangement. To present a more competitive internship program, we suggest that the Bureau consider offering a semester stipend in addition to the possibility of earning college credit. Such a program would also allow for BESB to identify new talent worthy of full–time positions.

CPPSR views the recent re–emergence of the Counselor Coordinator position as a positive development. During the BCAC teleconference, BESB’s Director mentioned that the incumbent will be responsible for helping clients get jobs and needed services. We perceive that this employee can serve as a critical liaison between upper management and the VR staff. As an example, a client recently called upper management to challenge a decision that a VR counselor made regarding technology training. These types of calls should be redirected to the Counselor Coordinator. In close consultation with the VR counselor handling the case, a decision can be made on how to address the dispute. This team–oriented approach will enhance the sense of camaraderie and teamwork within the Vocational Rehabilitation division.

VIII. Conclusion

Connecticut’s Bureau of Education and Services for the Blind has done an excellent job of providing services and employment opportunities for the blind population of the State. When clients get jobs, those placements are quality employment opportunities. The average wage for BESB clients in the Vocational Rehabilitation program is extremely competitive. While this may partially be attributed to the high cost of living in Connecticut, it may also be that BESB takes steps to ensure that its clients maintain a quality standard of living. Additionally, in fiscal year 2012, 47 out of 111 cases closed with employment resulted in the client receiving health insurance. Moving forward, with the implementation of the Affordable Care Act, this metric may become less significant. Still, we see this as a positive measure of the Bureau’s commitment to placing clients in viable, long–lasting employment opportunities. Counselors have a true passion for helping their clients.

The client satisfaction data also reveal positive trends. The survey results from 2012 and 2013 indicate that the Bureau is very popular among its clientele. As previously mentioned, the Bureau posted excellent satisfaction ratings in many key service areas. Notably, satisfaction ratings have improved over the last two years, even as funding has decreased. Not only has the Bureau been able to serve more individuals with less grant funding, but it was highly ranked in several of our comparisons with other states that did not have similar grant decreases.
Table 1: BESB Clientele, FY 2009–2013

<table>
<thead>
<tr>
<th>Year</th>
<th>Total</th>
<th>Children</th>
<th>Female</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>12,166</td>
<td>1,071</td>
<td></td>
</tr>
<tr>
<td>2010</td>
<td>12,426</td>
<td>1,097</td>
<td></td>
</tr>
<tr>
<td>2011</td>
<td>10,942</td>
<td>1,074</td>
<td></td>
</tr>
<tr>
<td>2012</td>
<td>10,735</td>
<td>1,123</td>
<td></td>
</tr>
<tr>
<td>2013</td>
<td>11,034</td>
<td>1,100</td>
<td></td>
</tr>
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</table>

Table 2: BESB Vocational Rehabilitation Participants, FY 2013

<table>
<thead>
<tr>
<th>Category</th>
<th>Total</th>
<th>Percentage of Total</th>
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</thead>
<tbody>
<tr>
<td>Participants</td>
<td>954</td>
<td>100%</td>
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<tr>
<td>Minorities</td>
<td>326</td>
<td>34%</td>
</tr>
<tr>
<td>African–American</td>
<td>182</td>
<td>19%</td>
</tr>
<tr>
<td>Hispanic/Latino</td>
<td>115</td>
<td>12%</td>
</tr>
<tr>
<td>Asian</td>
<td>19</td>
<td>2%</td>
</tr>
</tbody>
</table>

Table 3: BESB Vocational Rehabilitation Participants, FY 2012

<table>
<thead>
<tr>
<th>Category</th>
<th>Total</th>
<th>Percentage of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Participants</td>
<td>967</td>
<td>100%</td>
</tr>
<tr>
<td>Minorities</td>
<td>327</td>
<td>34%</td>
</tr>
<tr>
<td>African–American</td>
<td>183</td>
<td>19%</td>
</tr>
<tr>
<td>Hispanic/Latino</td>
<td>114</td>
<td>12%</td>
</tr>
<tr>
<td>Asian</td>
<td>19</td>
<td>2%</td>
</tr>
</tbody>
</table>

Table 4: State of Connecticut Minority Statistics, 2012

<table>
<thead>
<tr>
<th>Category</th>
<th>Total</th>
<th>Percentage of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Participants</td>
<td>970</td>
<td>100%</td>
</tr>
<tr>
<td>Minorities</td>
<td>328</td>
<td>34%</td>
</tr>
<tr>
<td>African–American</td>
<td>184</td>
<td>19%</td>
</tr>
<tr>
<td>Hispanic/Latino</td>
<td>115</td>
<td>12%</td>
</tr>
<tr>
<td>Asian</td>
<td>19</td>
<td>2%</td>
</tr>
</tbody>
</table>

Table 5: National Minority Statistics, 2012

<table>
<thead>
<tr>
<th>Category</th>
<th>Total</th>
<th>Percentage of Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Participants</td>
<td>972</td>
<td>100%</td>
</tr>
<tr>
<td>Minorities</td>
<td>330</td>
<td>34%</td>
</tr>
<tr>
<td>African–American</td>
<td>186</td>
<td>19%</td>
</tr>
<tr>
<td>Hispanic/Latino</td>
<td>116</td>
<td>12%</td>
</tr>
<tr>
<td>Asian</td>
<td>19</td>
<td>2%</td>
</tr>
</tbody>
</table>

Table 6: Comparison of Vocational Rehabilitation Employment Outcomes between BESB and States with Similar Grant Amounts, FY 2012

Table 7: Comparison of Vocational Rehabilitation Employment Outcomes between BESB and States Serving Similar Amounts of Individuals, FY 2012
Native–American/Pacific Islander – 9 – <1%

Table 3: BESB VR Participants FY 2012 (footnote 19)

POPULATION – NUMBER – PERCENTAGE OF TOTAL

Total VR – 958
Minorities – 321 – 33.5%
African–American – 184 – 19.2%
Hispanic/Latino – 118 – 12.3%
Asian – 19 – 2%
Native–American/Pacific Islander – 5 – <1%

Table 4: State of Connecticut Minority Statistics FY 2012 (footnote 20)

POPULATION – NUMBER – PERCENTAGE

Total Population – 3,591,765 – ~ 1% of national
Minority Population – 1,160,140 – 32.3%
African–American – 402,278 – 11.2%
Hispanic/Latino – 510,031 – 14.2%
Asian – 150,854 – 4.2%
Native American – 17,959 – 0.5%
Pacific Islander – 3,592 – 0.1%
Other – 75,427 – 2.1%

Table 5: National Minority Statistics (2012)

POPULATION – NUMBER – PERCENTAGE

Total – 313,873,685
Minorities – 122,096,863 – 38.9%
African American – 41,117,453 – 13.1%
Hispanic/Latino – 53,044,653 – 16.9%
Asian – 16,007,558 – 5.1%
Native American – 3,766,484 – 1.2%
Pacific Islander – 627,747 – 0.2%

Table 6: Comparison of Vocational Rehabilitation Employment Outcomes between BESB and States with Similar Grant Amounts FY 2012 (footnote 21)

CT – OR – IA – SC – AR – NM

Employment Rate:
CT 88.8% – OR 78.13% – IA 77.88% – SC 77.88% – AR 73.99% – NM 50.9%

Number Closed with Employment:
CT 111 – OR 100 – IA 81 – SC 257 – AR 313 – NM 35

Percent Closed with Employment at 35 Hours Per Week or More:
CT 39.2% – OR 18.75% – IA 41.35% – SC 31.21% – AR 38.53% – NM 12.1%

Average Hourly Rate:

Average Time to Close Months with Employment:
CT 28.5 – OR 38.6 – IA 28.0 – SC 17.3 – AR 22.1 – NM 63.9

Other 7,532,968 – 2.4%

Table 7: Comparison of Vocational Rehabilitation Employment Outcomes between BESB and States Serving Similar Amounts of Individuals FY 2012 (footnote 22)

CT – OR – IA – ID – MN

Employment Rate:
CT 88.8% – OR 78.13% – IA 77.88% – ID 75.47% – MN 50.94%

Number Served:
CT 125 – OR 128 – IA 104 – ID 106 – MN 159
Number Closed with Employment:

CT 111 – OR 100 – IA 81 – ID 80 – MN 81

Percent Closed with Employment at 35 Hours Per Week or More:

CT 39.2% – OR 18.75% – IA 41.35% – ID 45.0% – MN 43.21%

Average Hourly Rate:


Average Time to Close Months with Employment:

CT 28.5 – OR 38.6 – IA 28.0 – ID 27.1 – MN 45.6

Footnotes

1. BESB, "Annual Report on Services to Individuals who are Blind or Visually Impaired,"


6. BESB, "Annual Update on Services to Individuals from Minority Backgrounds" Under “Underserved Populations CT–B–FFY 2013,”


8. One such example is BESB’s alliance with Aspire.


11. Oregon had the second–best positive employment outcome figure at 78.13%.

12. This analysis excludes RSA data from states that combine disabilities.


20. U.S. Bureau of the Census, "Connecticut," under "Quick Facts http://quickfacts.census.gov/qfd/states/09000.html. This is a prediction based upon the 2010 US Census. All numbers that ended in .5 or above were rounded up to the next whole number.


B. WHO ARE MINORITIES;

Individuals from underserved populations are tracked in the Vocational Rehabilitation Program to ensure that they are engaged in services and fully understand the scope of available services that can be provided. Before any individual from a minority background is inactivated from the Program with an unsuccessful outcome, a supervisory review process is required. The Vocational Rehabilitation Supervisor confirms that the individual was provided with information in his or her preferred language and accessible format. Additionally, the Supervisor reviews the case record of services to confirm documentation is present, substantiating that the individual was afforded the opportunity to make informed decisions in regards to participation in the Vocational Rehabilitation Program.

The Vocational Rehabilitation Program has two Counselors who are bicultural and fluent in Spanish. Throughout the past fiscal year, these two staff members each served half of the state, with each of these Counselors serving the Spanish-speaking clients within their assigned territory. The Vocational Rehabilitation Program also employs a Counselor who is African-American and who serves a caseload in traditionally underserved communities. These staff members engaged in extensive outreach activities, working with employers, community rehabilitation providers and community based organizations to share information on Bureau services and to secure work assessments, internships and job placements. Among the employers were Capital Cleaners, Neighborhood Studios, Neighborhood Housing, Kimmy's Homemaker and Companion Services, Caring Connection, Dress for Less Inc., Center for Latino Progress, Stub Hub, New Britain Recreation Center, Adult Education Center in Hartford, and Sean Patrick's Plants. Community rehabilitation providers that assisted with training and job placement services included Futures, CW Resources, Marrakech and the Chrysalis Center.

A key component of successful strategies in job placement is to work with community based organizations that can assist with housing, mental health supports, medical services and benefits as well as family support services. Outreach efforts have included working with Neighborhood Housing, New Opportunities, Dads Matter Too, Acts 4 Ministries, Mi CASA, Family Services of Woodfield, Boys and Girls Village, Merton House Soup Kitchen, and the Bridgeport Senior Center.

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

According to current data on the U.S. Census Bureau website, 31.6% of the overall populations of Connecticut identify race or ethnicity from a minority background. This data further breaks down to 11.5% of the overall population as African-American, 15% as Hispanic or Latino, 0.5% as American
Indian/Alaska Native, 4.5% as Asian, and 0.1% as Pacific Islander. Analysis of the demographics of clients in the Vocational Rehabilitation Program found that 39.9% indicated race or ethnicity from a minority background, exceeding the overall demographic of 31.6% for Connecticut. This can be further broken down as 21.7% identifying their race or ethnicity as African–American; 15.5% identifying their race or ethnicity as Hispanic or Latino; 2.7% identifying their race or ethnicity as Asian, and less than 1% identifying their race or ethnicity as American Indian/Alaska Native or Pacific Islander. As this data illustrates, outreach efforts to underserved populations by the Bureau have been effective in reaching and serving individuals from traditionally underserved populations.

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

Vocational Rehabilitation Counselors and Rehabilitation Technologists coordinate services with the One Stop operators to assist VR clients in successfully accessing services such as job seeking skills classes, resume development and access to employer job openings.

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

BESB is actively engaging blind youth in the State of Connecticut. In fiscal year 2011, the Bureau’s registry accounted for 10,942 blind individuals. Out of that number, 1,074 were children. The 2012 report reveals that 1,123 out of 10,735 individuals on BESB’s registry were children. This reflects a 3% increase in their enrollment. While the registry grew 2.7% in FY 2013 (totaling 11,034), the number of children decreased to 1,100 (footnote 9). This represents a drop of less than 1%. The amount of children served since the last Assessment saw a statistically insignificant increase of .09%.

For fiscal year 2016, plans are in place to dedicate two of the existing Vocational Rehabilitation Counselors to work exclusively with caseloads of Pre–Employment Transition–Age students. The service delivery model will have one Counselor covering the Southwestern portion of the State based on the demographic of where many of the students are located. The other Counselor will cover the remaining portion of the State. Dedicating two Counselors to work exclusively with the Pre–Employment Transition–Age students will ensure a strong focus on preparing students for careers and higher education after exiting high school.

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

Other than providing training to staff of community rehabilitation programs on blindness related technology and adaptations for accessing training and employment, no needs to establish, develop or improve upon these programs have been identified.
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.

BESB conducts career exposure camps, mentoring programs, college days and skills acquisition events, and works with school district staff to incorporate these activities into the IEP or service plan of the students. The VR program also explores job exposure and job options that school districts offer to students with disabilities.

K. ANNUAL ESTIMATES

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

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

The Department of Rehabilitation Services, Bureau of Education and Services for the Blind is a comprehensive service delivery organization, providing a wide range of rehabilitative services to children and adults who are legally blind or visually impaired within Connecticut. Presently the Bureau has identified 11,854 individuals who meet these criteria and are listed on the Bureau’s Blind Registry. Of that number, 10,766 of these individuals are adults and 1,088 are children. Through outreach efforts, the Bureau has worked to ensure that all individuals who are legally blind have access to and knowledge of the services provided by this organization.

The Vocational Rehabilitation (VR) Program provides a wide range of services to eligible individuals. Guidance and counseling, mobility training, rehabilitation technology, adaptive equipment, rehabilitation teaching, job coaching, on–the–job training, low vision services, as well as a variety of skills assessments, are among the services provided.

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

A. THE VR PROGRAM;

Of the total number of individuals on the Bureau’s registry, 992 clients are presently registered with the Vocational Rehabilitation Program, with 797 of these individuals found eligible for services. The majority of the remaining 195 individuals are in referral status or applicant status moving towards eligibility determinations.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

Of the total number of eligible individuals, 27 clients have been determined eligible for supported employment services.
C. EACH PRIORITY CATEGORY, IF UNDER AN ORDER OF SELECTION;

Not applicable.

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

Not applicable.

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

In fiscal year 2014, there were a total of 1,016 participants in the Vocational Rehabilitation Program. The Vocational Rehabilitation Program expended $1.39 million in purchased client services during the fiscal year. Additionally, $598,000 was expended for the improvement and maintenance of Business Enterprise locations. Total Program costs, including all purchased services, staffing, and administrative operations were approximately $5.56 million for the year. For Fiscal Year (FY) 2015, budget projections indicate that approximately $5.51 million will be expended on combined Program costs, including an estimated $1.69 million in purchased services to serve approximately 1,100 clients, and $3.82 million in administrative and operational costs. This estimate includes inflationary adjustments, inclusion of indirect cost charges of 12.5 percent to the Vocational Rehabilitation Program, as well as projected costs to serve transition age students who are visually impaired as well as who are legally blind.

With the availability of $4.12 million in Title I carry over funds from FY 2014 in addition to the federal Title I allotment of $3.1 million (representing 15 percent of the total Title I allotment received by Connecticut) and state matching funds of approximately $900,000, the Program did not need to enter into an Order of Section in FY 2015 and is not projecting the need for an Order of Selection in FY 2016.

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, objectives, strategies and measures of performance were developed in collaboration with the State Rehabilitation Council. These goals reflect the vision of Governor Dannel P. Malloy and the accompanying priorities and strategies of the statewide workforce system and the regional partners to contribute towards the achievement of the Governor’s vision. Additionally, this document details the strategies that will be utilized by the Vocational Rehabilitation Program to contribute towards the achievement of these shared goals through the provision of services to individuals with significant visual impairments and to employers across the state.
Governor Dannel P. Malloy’s Vision: Connecticut will create and sustain the global economy’s best-educated, most-skilled, most-productive workforce.

Overarching Goals:

Promote Business Growth: Connecticut businesses in key sectors (economic drivers) must have the skilled, talented employees needed to compete effectively, prosper and create jobs for CT workers.

Strengthen Current Workforce: Workers must have the skills and credentials needed to prosper and advance in careers that support their families.

Develop Future Talent: Connecticut youth must be prepared and ready for career and post-secondary success as productive contributors to a competitive state economy.

System Transformation: Connecticut’s multi-faceted workforce system must align and integrate goals, strategies, policies, investments, services, infrastructure and accountability.

Objective 1. Analyze economic conditions, including existing and emerging in-demand industry sectors and occupations.

Strategy: Identify employment needs of employers – knowledge, skills, abilities in key industries and occupations.

Measure: Documentation of coordination with CTDOL, Office of Research to obtain data and information.

Strategy: Analysis of current workforce unemployment data, labor market trends, workforce’s educational and skill levels (including individuals with barriers/disabilities).

Measure: Documentation of coordination with CTDOL, Office of Research to obtain data and information.

Strategy: Analysis (strengths, weaknesses, capacity) of CT’s workforce development activities (including education and training), to address identified education/skill needs and employment needs of employers.

Measure: Coordination with CTDOL, Office of Research to obtain data and information.

Objective 2. Implement strategies for workforce partners to prepare educated/skilled workforce.

Strategy: Establish performance accountability measures and align strategies across the workforce programs to support economic growth and self-sufficiency, and how Connecticut will assess workforce system effectiveness.

Measure: Performance measures established with each partner program’s anticipated contribution to the measures noted.

Objective 3. Operationalize the Service Delivery System
Strategy: Review statewide policies, programs, and recommended actions to support comprehensive streamlined workforce system.

Measure: Vocational Rehabilitation provides policies to workforce partners for review.

Strategy: Develop/continuously improve workforce system: identify coordination/alignment barriers (avoid duplication); develop career pathways strategies; develop outreach/access strategies for individuals and employers; develop/expand industry/sector partnership strategies; identify regions/designate local areas; develop One–Stop system continuous improvement strategy; develop staff training strategies.

Measure: Vocational Rehabilitation staff participate in regional and statewide workforce meetings that focus on implementation of coordinated One–Stop service delivery system.

Strategy: Develop and update comprehensive State performance accountability measures.

Measure: Vocational Rehabilitation provides data on performance in identified accountability categories.

Strategy: Identify/disseminate info on best practices for: effective operation of One–Stop centers; development of effective local boards; effective training programs responsive to real–time labor market analysis.

Measure: Vocational Rehabilitation provides to the state and regional workforce system evidence based practice on successful job placement and retention strategies for individuals with significant disabilities.

Strategy: Develop and review statewide policies to coordinate services through One–Stop system: criteria and procedures for WIBs to assess effectiveness and continuous improvement; guidance to allocate One–Stop center infrastructure funds; policies on roles/contributions of One–Stop partners.

Measure: Documentation of Vocational Rehabilitation staff participation in the review and development of coordination of services to people with significant disabilities with One–Stop center staff and partners.

Strategy: Develop strategies for technological improvements to One–Stop system to: enhance digital literacy skills; accelerate acquisition of skills and credentials; strengthen staff professional development; ensure accessibility of technology.

Measure: Documentation of Vocational Rehabilitation adaptive technology consultations and recommendations for equipment to make the One–Stop centers accessible to individuals with significant disabilities.

Strategy: Develop strategies to align technology and data systems across One–Stop partner programs.

Measure: Documentation of Vocational Rehabilitation staff participation in statewide meeting regarding the development of a common–front end data collection system.
Strategy: Develop allocation formulas to distribute funds to local areas for adult and youth programs.

Measure: Documentation of Vocational Rehabilitation staff participation in cost allocation formula reviews that follow prescribed federal requirements.

Strategy: Prepare annual performance reports.

Measure: Vocational Rehabilitation report on performance measures distributed.

Strategy: Develop statewide workforce and labor market information system.

Measure: Vocational Rehabilitation staff provide data on job placements for clients served by the program.

Strategy: Develop other policies to promote statewide objectives and enhance system performance.

Measure: Documentation of BESB participation in the development of state policies and objectives.

Strategy: Alignment of funded activities.

Measure: Vocational Rehabilitation clients gain access to core services offered by the One–Stop centers with information provided in accessible formats by the centers.

Strategy: Alignment with activities not covered by Plan, to assure coordination, avoid duplication.

Measure: Independent Living services are offered and provided to eligible individuals with disabilities who are being served by the One–Stop centers.

Strategy: Coordination of activities, comprehensive services, including support services.

Measure: Vocational Rehabilitation staff members participate in regional and statewide planning and implementation meetings to coordinate the provision of vocational rehabilitation services to eligible clients served by the One–Stop delivery system.

Strategy: Engagement with community colleges, career/technical schools, to leverage resources.

Measure: Vocational Rehabilitation staff become participating members in regional teams that develop certificate and training programs at community colleges and career/technical schools to ensure curriculum accessibility for individuals with significant disabilities.

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

In addition to the participation of the Vocational Rehabilitation Program in contributing to the aforementioned, comprehensive statewide goals for the Workforce system, the following, goals, objectives, strategies and measures specific to the Vocational Rehabilitation Program have been developed with the full participation and guidance of the State Rehabilitation Council. These goals, objectives and accompanying strategies reflect on the priority to provide comprehensive, timely and quality services to clients of the Vocational Rehabilitation Program, including those clients who are
receiving supported employment services. Based on a review of the findings and recommendations in the Statewide Assessment and the Consumer Satisfaction Survey, as well as a review of the most recent Section 107 report and the performance achieved on established program measures in existence at the time of this plan's development, these priorities have taken into account this information to shape the efforts of the Council in establishing focus areas for the coming year.

Goal A: Increase employment opportunities for eligible individuals of the Vocational Rehabilitation Program.

Objective: BESB will collaborate with BRS and at least one major employer with a statewide presence to implement a Disability Resource Team to assist the employer with job recruitment and retention services.

Strategy: BESB Job Developer will coordinate with BRS Job Development Team to identify and work with employer(s) to implement a Resource Team.

Measure: Team is developed and implements resource meetings with employer(s).

Objective: BESB Counselors join job development teams implemented through the regional workforce boards to gain access to employers within the regions who are seeking job candidates.

Strategy: Counselors contact the Job Developers of the regional One Stop Center to become part of their employer outreach teams.

Measure: Each counselor serves as part of a regional job development team.

Objective: Vocational Rehabilitation clients obtain proficiency to utilize web–based job search websites.

Strategy: Rehabilitation teachers and/or fee for service vendors teach no less than ten job seeking clients how to navigate and utilize at least one job search website on the internet.

Measure: Documentation of utilization by each client.

Objective: Each BESB Counselor with job development responsibilities shall engage clients on their caseloads in job fair attendance.

Strategy: Vocational Rehabilitation Counselors will share information on job fairs within their regions with job seeking clients on their individual caseloads and facilitate the attendance of clients at job fairs.

Measure: Documentation of no less than 5 clients per Counselor caseload attending a job fair.

Goal B: Provide coordinated services to students with disabilities to prepare for careers and post–secondary education after exit from high school.

Objective: The Vocational Rehabilitation Program shall designate two full–time Counselors to exclusively serve clients that are in the Pre–Employment Transition Services (PETS) category.
Strategy: Junior high and high school clients will be assigned to one of the counselor caseloads to receive specific, qualifying PETS services with dedicated PETS funding.

Measure: Documentation of caseload assignments.

Objective: PETS eligible students and their parents/guardians shall receive a resource guide that explains all of the BESB services that can be provided to prepare for careers and post-secondary education.

Strategy: The Vocational Rehabilitation Program shall develop a transition resource guide to post on the Bureau’s webpage of the DORS website and to distribute to PETS eligible clients and their parents/guardians in their preferred format.

Measure: Case record documentation that the resource guide has been mailed or delivered to each PETS eligible client and their parents/guardians.

Objective: PETS eligible clients are provided timely notice of opportunities from the Vocational Rehabilitation Counselors and/or the Transition Coordinator to participate in work exposure programs, paid employment, internships, college preparatory programs, technology training programs, life skills programs and related career development camps, seminars and initiatives, both in state and out of state.

Strategy: Vocational Rehabilitation Counselors and the Transition Coordinator working with the PETS clients provide timely information on available services and programs so that clients and their guardians can make informed decisions on attendance at programs, activities and related transition experiences of interest.

Measure: Case record documentation of the services being authorized.

Objective: The Vocational Rehabilitation Program develops and implements outreach and public education programs for potentially PETS eligible clients and their parents/guardians.

Strategy: Vocational Rehabilitation Transition Coordinator designs and delivers outreach and public education programs to populations where PETS eligible clients are likely to be found, such as, but not limited to school districts.

Measure: Documentation of the programs being provided.

Objective: The Vocational Rehabilitation Program and the State Rehabilitation Council co–sponsor leadership development activities and camps for groups of PETS eligible clients. Strategy: The State Rehabilitation Council and the Vocational Rehabilitation Program provide co–sponsorship funding for the Youth Leadership Forum, and similar programs if available.

Measure: Documentation of the funds committed.

Goal C: Utilize Innovation and Expansion authority to engage in continuous improvement initiatives, to increase access to services and activities that can benefit groups of individuals with visual impairment or legal blindness, to increase access to career information, adaptive technology, self-advocacy, and public awareness of the employment potential of individuals served by BESB.
Objective: The Vocational Rehabilitation Program shall provide funding for electronic access to career and news information.

Strategy: Funding provided to have NFB Newsline available to Vocational Rehabilitation clients.

Measure: Documentation of purchase order for NFB Newsline.

Objective: Provide access to the latest adaptive technology devices for clients to try out for assessment purposes. Strategy: Purchase new adaptive technology devices for the BESB Technology Lab and the Technology Lab at the Southeastern Connecticut Community Center of the Blind.

Measure: Documentation of purchase order for technology devices.

Objective: The State Rehabilitation Council utilizes an entity experienced in administering consumer satisfaction surveys to conduct the fiscal year 2016 Consumer Satisfaction Survey and the results are used to develop continuous improvement initiatives.

Strategy: The State Rehabilitation Council selects a vendor, reviews the results of the survey, and works with Program staff to implement strategies that address the results and trends identified in the survey.

Measure: Documentation of purchase of survey, Consumer Satisfaction Report received and reviewed with Program staff.

Objective: State Rehabilitation Council representatives participate in state, regional and national conferences and programs that provide opportunities to increase public awareness of the employment capabilities of BESB clients, increase the Council members knowledge and understanding of the public Vocational Rehabilitation Program, and create opportunities for learning best practices that can develop into new goals and strategies for the BESB Vocational Rehabilitation Program to explore and implement, if applicable.

Strategy: State Rehabilitation Council Chair is provided with information about upcoming conferences, seminars and activities from the Bureau Director and designates a Council member or members to participate and share information with the full membership.

Measure: State Rehabilitation Council members attend CSAVR, NCSAB and other national, regional or statewide conferences or seminars that address the components stated in the objective.

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;

The comprehensive needs assessment and the consumer satisfaction survey results were utilized in considering and developing these goals.
B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND

The bureau has factored in our role in achieving statewide WIOA performance measures in establishing the goals for the VR program.

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDING AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

The State Rehabilitation Council has reviewed the comprehensive needs assessment, the consumer satisfaction survey results and trends in outcomes and services provided in addressing the goals that were developed.

M. ORDER OF SELECTION

Describe:

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES.

The Bureau is not operating under an order of selection and provides services to all eligible individuals.

B. THE JUSTIFICATION FOR THE ORDER.

Not applicable.

C. THE SERVICE AND OUTCOME GOALS.

Not applicable.

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

Not applicable.

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

Not applicable.
2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT.

Not applicable.

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

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

It is the primary goal and priority of the Vocational Rehabilitation Program to consider supported employment as an option in all circumstances where the provision of these services will increase the likelihood of placement success for people with significant, multiple barriers to employment.

The Vocational Rehabilitation Program for individuals who are blind received $45,000 in Title VI, Part B funds for fiscal year 2014. In Fiscal Year (FY) 2014, there were 3 clients who achieved employment outcomes in supported employment settings. The funding source for long–term support for 2 of these situations was the Department of Developmental Services, with the client’s family being the provider of long–term support in the third situation since the client works at a family–run business. Community rehabilitation providers were utilized for onsite training in all three situations.

Fourteen (14) new clients were found eligible for supported employment services during the fiscal year, bringing the total number of clients that have been found eligible for supported employment services to 30. Of the 30 clients that were eligible for supported employment services during the fiscal year, 3 clients achieved employment outcomes, 1 individual was in plan status, 1 individual was placed in employment status, 1 individual was moved to services interrupted status due to medical issues and 24 individuals were in a service status. Of this total number of eligible individuals, Title VI, Part B funds have been utilized for 8 individuals during the fiscal year.

Community rehabilitation providers continue to be utilized most frequently as the providers of extended services for the employment programs coordinated. In the current and upcoming year, this approach will continue to be utilized. This is based on the history of job placement outcomes from preceding fiscal years that has continually demonstrated the proven ability of community rehabilitation providers to employ job coaches and vocational instructors necessary for the provision of long–term employment supports, combined with their willingness to periodically assume the cost of providing extended services when other public funding options are not available. This arrangement is especially important, given the limited availability of third party funding from other public agency providers.

In addition to the option of utilizing community rehabilitation providers for the provision of extended services, the successful utilization of natural supports through a client’s family and the use of a volunteer organization in placement situations in prior years have shown promise as a practice to replicate to expand options for the provision of support services. It is a high priority goal to identify all possible providers of long–term funding to cover the cost of providing the supports over an extended period of time. In addition to seeking out community rehabilitation providers who can financially assume the role of becoming the provider of extended services, the Vocational Rehabilitation Program will continue to explore the option of utilizing volunteer groups, employers, and families
where feasible to offer natural supports as an option. The Program will also continue to contract with community rehabilitation providers who can access public and private funds in order to secure supported employment placements.

The Vocational Rehabilitation Program will continue to distribute funds to providers and employers who can offer the long–term assurances that supports will be in place to enable people with the most significant disabilities to participate in integrated employment with competitive wages and benefits. Vocational Rehabilitation Program staff will continue to participate in Planning and Placement Team meetings early in the transition process to identify the need for supported employment services, and to identify providers, both private and public, that may offer services while a student is preparing to transition from public or private education into employment. Vocational Rehabilitation Counselors will also utilize supplemental evaluations through community rehabilitation providers to identify the need for supported employment services prior to the development of Individualized Plans for Employment in situations where it is uncertain if long–term supports will be necessary to ensure a successful placement outcome.

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

In order to facilitate the identification of supported employment options for transitioning high school students, the two Vocational Rehabilitation Counselors assigned to work with this specific client population participate in Planning and Placement Team meetings (PPTs) and work in cooperation with the Children’s Services Program at BESB. The number of students who are legally blind or visually impaired who are age fourteen and older continue to be tracked by the Vocational Rehabilitation Program to ensure that services are offered and made available. There are approximately 140 students of transition age who are presently being served in the Vocational Rehabilitation Program. With the implementation of the Workforce Innovation and Opportunity Act (WIOA), there are new provisions pertaining to serving youth with disabilities, and in particular, for youth with significant disabilities who require supported employment services, the Vocational Rehabilitation Program can fund the cost of extended services for up to 4 years in situations where no other funding options are available. Provisions within WIOA require that 50 percent of Title VI B funds are reserved to exclusively serve youth with significant disabilities to assist with meeting this priority.

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 Bureau works collaboratively with the Department of Developmental Services, the Department of Mental Health and Addiction Services, employers and community providers to identify and secure alternative sources of long–term funding and support, where available.
Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES.

The following strategies support the goals and objectives that have been identified with the participation of the State Rehabilitation Council (SRC), and reflect the commitment of the Bureau to increase employment opportunities for people who are legally blind or visually impaired through the provision of Vocational Rehabilitation and Supported Employment Services.

Methods To Be Used to Expand and Improve Services:

Utilizing the results and recommendations from the Comprehensive Needs Assessment, as well as the Section 107 Review conducted by Rehabilitation Services Administration, the Program has identified areas that need further expansion and revision to better serve clients. Shortening the timeframe for the development of the Individualized Plan for Employment was recommended in the Section 107 Review. This recommendation was implemented in Bureau policy subsequent to a public hearing process and prior to the passage of the Workforce Innovation and Opportunity Act. The Act prescribes a time frame of 90 days for plan development to occur. The Program is utilizing this new requirement to ensure the timely movement of case services subsequent to determinations of eligibility.

To augment the capacity of maintaining adequate levels of contact with clients, the Program embraced the recommendation of the Center for Public Policy and Social Research to contact graduate level programs that offer Master’s Degrees in Rehabilitation Counseling and closely related fields to seek internship and practicum students who could assist the Program in contacting clients, following up on service requests and maintaining higher levels of contact than what is possible with the existing staffing levels. This approach has been very successful, with students from Springfield College and Central Connecticut State University coming to the Bureau for their graduate field work in the Vocational Rehabilitation Program.

The Vocational Rehabilitation Program further addressed case management activities through the reestablishment of the Vocational Rehabilitation Counselor Coordinator position, which had been vacant for several years. A major focus of this position is to assist the Counselors with case management strategies. Utilizing the newly developed case management computerized dashboard, the Coordinator, Supervisor and the Counselors are able to track the timely movement of client services and timeframes for case status changes. The dashboard is capable of analyzing trends by caseload to further assist in identifying where additional activity is required.

The other major focus of the Coordinator position is to serve as the statewide job placement point of contact with employers. The Coordinator organizes the Bureau’s participation in job fairs held by partner agencies of the workforce system, coordinates meetings between employers and Counselors in situations where an employer has locations that cross Counselor territories, and also
serves as the point of contact with the national job matching system operated by the Council of State Administrators of Vocational Rehabilitation (CSAVR).

The results of the Comprehensive Needs Assessment also found that while the Bureau’s website contained a considerable amount of important and useful information, it was organized in a way that made it difficult to search for information by topic. An extensive review of the website was subsequently conducted and substantial revisions were implemented. The Bureau’s website is now organized by type of service, with subcategories under each major service heading. Policy manuals are grouped by program type as well so visitors to the website can locate and search the applicable policies more conveniently than in the past.

The Comprehensive Needs Assessment also recommended that BESB develop a presence in social media, possibly uploading information on services to You Tube. This recommendation has been explored and has been conservatively implemented. To date, there have been 5 BESB mentor videos uploaded to You Tube for public viewing, but plans for greater expansion in the use of social media have become part of the larger discussion at the agency level. It is anticipated that the agency and the Bureau will expand further into social media in future years.

Results of the Consumer Satisfaction Survey indicated that levels of satisfaction with low vision services were on the decline. Over the past several years, the number of doctors on the approved provider list has decreased, due to retirements and also due to doctor dissatisfaction with the paperwork burden required to obtain payments from the agency for fee schedule rates that are less than what the doctors can receive by seeing private pay patients. More Low Vision doctors would add increased options for clients and hopefully also reduce wait times for clients to get a low vision appointment, since many of the current doctors on the low vision provider list limit the number of BESB referred clients they will see each month. Toward that end, the Bureau Director sought and obtained an opportunity to speak at the statewide Optometric conference on the topic of seeking additional low vision providers. Subsequent to that event, three doctors have expressed an interest in becoming approved low vision providers. Efforts are underway to have their applications processed so they can be utilized.

2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS.

The Vocational Rehabilitation Program employs two full time Rehabilitation Technologists who are available to provide individualized assessments on adaptive technology options and solutions so that clients can make informed decisions as to the best option for their particular vocational training and employment situations. The Technologists are able to provide these assessments at the employer site, training facility or home of the client by utilizing a portable array of technology devices that are maintained by the Bureau.

Additionally, the Bureau maintains a fully equipped adaptive technology laboratory in Windsor that is available for both assessments and training sessions. In collaboration with the Southeastern Connecticut Community Center of the Blind, an additional technology laboratory is located at their facility in New London.

The Bureau further employs two full time Rehabilitation Teachers, who provide training in the use of adaptive devices that have been provided for client use in training and employment. Their services
are available in addition to the use of both in state and out of state vendors that offer fee for service training in the use of technology devices.

Through the Assistive Technology Act, BESB works closely with the Bureau of Rehabilitation Services to provide outreach and referrals of clients who are deaf and blind so that clients who meet the eligibility requirements of the Deafblind Technology Grant can apply for and received specialized adaptive equipment to increase their access to communication.

3. THE OUTREACH PROCEDURES THAT WILL BE USED TO IDENTIFY AND SERVE INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES, INCLUDING THOSE WITH THE MOST SIGNIFICANT DISABILITIES, AS WELL AS THOSE WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM.

The Vocational Rehabilitation Program has two Counselors who are bicultural and fluent in Spanish. Throughout the past fiscal year, these two staff members each served half of the state, with each of these Counselors serving the Spanish–speaking clients within their assigned territory. The Vocational Rehabilitation Program also employs a Counselor who is African–American and who serves a caseload in traditionally underserved communities. These staff members engage in extensive outreach activities, working with employers, community rehabilitation providers and community based organizations to share information on Bureau services and to secure work assessments, internships and job placements. Among the employers utilized in the past year were Capital Cleaners, Neighborhood Studios, Neighborhood Housing, Kimmy’s Homemaker and Companion Services, Caring Connection, Dress for Less Inc., Center for Latino Progress, Stub Hub, New Britain Recreation Center, Adult Education Center in Hartford, and Sean Patrick’s Plants. Community rehabilitation providers that assisted with training and job placement services included Futures, CW Resources, Marrakech and the Chrysalis Center.

A key component of successful strategies in job placement is to work with community based organizations that can assist with housing, mental health supports, medical services and benefits as well as family support services. Outreach efforts have included working with Neighborhood Housing, New Opportunities, Dads Matter Too, Acts 4 Ministries, Mi CASA, Family Services of Woodfield, Boys and Girls Village, Merton House Soup Kitchen, and the Bridgeport Senior Center.

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).

Vocational Rehabilitation Counselors participate in Planning and Placement Team (PPT) meetings of clients who are in junior high or high school and assist in the development of Individualized Education Programs (IEP’s) for students. The services that are detailed in the IEP of each student are factored into the development of each client’s Individualized Plan for Employment (IPE), which must be developed within ninety (90) days of the determination of eligibility for vocational rehabilitation services, or by the time the client exits high school, whichever comes sooner. Vocational Rehabilitation Counselor involvement begins as early as age 14, with referrals to the Program initiated by the Education Consultants of the Bureau’s Children’s Services Program and Teachers of the Visually Impaired that work directly for school districts. The client is assigned to one
of the two Vocational Rehabilitation Counselors that are exclusively dedicated to serving pre–
employment transition services eligible clients. Assignments are based on geographic location of the
client.

Since BESB maintains a registry of all students who are legally blind or visually impaired within
Connecticut, the process for identifying and referring clients from Children's Services to the
Vocational Rehabilitation Program is streamlined and efficient. The electronic case management
system for the Bureau has a built in tracking system for identifying clients by age range to further
facilitate the referral of clients who desire to participate in vocational rehabilitation services. The
Vocational Rehabilitation Counselors work with the students, educators, parents or legal guardians
and the Program’s Education Projects Coordinator to identify careers of interest, develop career
exploration opportunities, work and job shadowing experiences, mentoring activities and leadership
development programs.

In addition to serving on the statewide transition taskforce, the Vocational Rehabilitation Program’s
Educational Projects Coordinator is also an active member of the Board of Directors of the Youth
Leadership Project that oversees the Youth Leadership Forum. The forum is a yearly event that
Teaches students with disabilities leadership and self–advocacy skills.

BESB continues to conduct career exposure camps for high school students who are visually
impaired or legally blind. These programs include opportunities to interact with former recipients of
vocational rehabilitation services who are successfully employed in a variety of careers. Some of
these programs are held on college campuses, where the students gain a firsthand perspective of
residential campus life in addition to gaining insight into a variety of careers that former clients are
now engaged in.

Vocational Rehabilitation Program staff members continue to participate and present information at
in–service training programs organized by the Bureau for public school teachers and guidance
counselors on issues affecting students who are blind or visually impaired. The Children’s Services
Program of the Bureau further provides a comprehensive training series every year for school district
staff to learn about low vision aids and adaptive technology, braille instruction, expanded core
curriculum activities and resources that are available to facilitate the education and transition of
students served by BESB.

The Vocational Rehabilitation Program has also established a goal of participating in Planning and
Placement Team meetings early in the transition process to identify the need for supported
employment services, and to identify providers, both private and public, that may offer services while
a student is preparing to transition from public or private education into employment.

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

Other than providing training to staff of community rehabilitation programs on blindness related
technology and adaptations for accessing training and employment, no needs to establish, develop
or improve upon these programs have been identified.
6. STRATEGIES TO IMPROVE THE PERFORMANCE OF THE STATE WITH RESPECT TO THE PERFORMANCE ACCOUNTABILITY MEASURES UNDER SECTION 116 OF WIOA.

The Workforce Innovation and Opportunity Act established new measures of performance for the partner programs to collectively work towards achieving. The Vocational Rehabilitation Program is participating in discussions on the implementation of these new performance measures with the other partners at both the state and the regional level. At this point in the development process, it is premature to discuss how to improve performance on measures that have not been established and implemented at the partner agency level. This Bureau shall have an active and integral role in contributing towards the achievement of the regional and statewide performance measures by working collaboratively with the other workforce partners to coordinate services and to leverage the resources and employer contacts that will be mutually available to the partner programs.

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

The Vocational Rehabilitation staff’s expertise on blindness related topics, including how adaptive technology can be utilized to make core services of the One Stop Centers and training programs accessible, will also benefit the partner programs. This level of technical assistance to the partners will resolve many barriers, both anticipated and unanticipated by the partner program staff, in regards to training materials and tasks that require adaptive technology to access.

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

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

Employer outreach and engagement are key components of the workforce system to achieve success in the performance measures and toward that end, the benefits of becoming part of a unified approach toward employer outreach will serve the Vocational Rehabilitation Program and the partner programs particularly well. Being a part of regional job development teams will ensure that Counselors of the Bureau are at the forefront of discussions with employers who are seeking to fill job vacancies as well as those employers who are considering expansion in this state.

An additional potential benefit that is anticipated will be a coordinated approach toward the use of social media to expand the reach of all partner programs in communicating the availability of the myriad of services that are offered through the partner programs. Expanding the use of social media to educate the public about services was a recommendation contained in the Comprehensive Needs Assessment and through a coordinated effort across partner programs, this recommendation is likely to experience a greater level of growth than it may have experienced as a separate and distinct goal for this Bureau.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

Access to career information and job openings is a key component of the Innovation and Expansion activities that have been established as priorities for the Vocational Rehabilitation Program. The opportunity to become part of a larger, organized and comprehensive approach to access job search
engines is particularly beneficial. BESB staff can contribute to this initiative by offering technical assistance on accessibility requirements so that equal access among program participants can be achieved.

Programs serving youth, including youth from unserved and underserved populations is another priority that has been identified in the Innovation and Expansion initiatives for this Bureau. The Vocational Rehabilitation Program staff can provide information to the partner programs on the types of leadership development camps and initiatives that it had designed and utilizes, so the partner programs that serve youth can assess if similar models would be beneficial to their clients.

Additionally, youth training, employment and leadership programs offered by partner agencies may be readily accessible to clients of the Vocational Rehabilitation Program, opening new opportunities that were previously unknown or unavailable to clients of this Bureau.

Expansion of the availability of adaptive technology in training programs, core services and apprenticeship programs is another category where there is considerable opportunity for growth. Bureau staff will bring their knowledge of blindness related technology accommodations into discussions with the partners so that solutions can be identified and implemented in the planning stages of new initiatives, ensuring equal access to services.

C. OVERCOME IDENTIFIED BARRIERS RELATING TO EQUITABLE ACCESS TO AND PARTICIPATION OF INDIVIDUALS WITH DISABILITIES IN THE STATE VR SERVICES PROGRAM AND THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM.

Perhaps the most significant barrier is within the category of training materials that are utilized across a broad spectrum of vendors and service providers utilized by the partner programs and the One Stop Centers. Materials are often created in formats that do not readily lend toward conversion into accessible text to speech formats for those clients who are not able to access print. This is particularly seen in training materials that are distributed electronically, where PDF files are a common format of the documents being distributed. Being at the front end of discussions with partner programs on how to make training materials accessible from the onset will bring about a seamless training opportunity for clients of this Bureau. In this scenario, training materials in accessible formats would be prepared in advance and distributed to seminar and training program participants who are blind at the same time that other participants receive their materials. Rehabilitation Technologists are available to participate in the review of the training materials and to offer recommendations on how to make the information accessible.

P. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

Describe:
1. AN EVALUATION OF THE EXTENT TO WHICH THE VR PROGRAM GOALS DESCRIBED IN THE APPROVED VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

A. IDENTIFY THE STRATEGIES THAT CONTRIBU TED TO THE ACHIEVEMENT OF THE GOALS.

The following summary details the goals and objectives established with the participation of the State Rehabilitation Council (SRC) and the outcomes for each of these goals.

GOAL A (the desired outcome)

CLIENT SERVICES GOAL: Individuals who are blind acquire the necessary skills and training to obtain and retain employment in a challenging economy.

Objectives (The reasons the goal is of high importance):

1. Due to the continuation of a challenging economic climate, individuals who are blind continue to experience fewer opportunities to access and maintain employment, requiring a greater diversity of skills and flexibility in adapting to employer needs.

2. Employment provides individuals who are blind the opportunity to be contributing, self-sufficient members of society.

3. Career advancement is an important aspect of career development, resulting in greater likelihood of achieving self-sufficiency.

4. For individuals who are losing vision or whose job duties change, assistance to maintain employment is often necessary.

5. For individuals who are blind and who experience multiple barriers to employment, on-the-job training and long-term job supports enable achievement and maintenance of employment.

Strategies (The methods for achieving the objectives):

1. Vocational Rehabilitation clients will be trained in the use of new internet-based job search engine technologies to identify and apply for job openings.

2. The Vocational Rehabilitation Program will facilitate a job seekers skills training on resume writing and interviewing techniques.

3. Vocational Rehabilitation staff that have job placement as a primary responsibility will each conduct ongoing employer outreach activities.

4. Vocational Rehabilitation clients will receive training in the use of new smart-phone and tablet technologies that have built in accommodation features.
5. Vocational Rehabilitation staff will conduct training sessions for disability coordinators at Connecticut colleges to become familiar with the supports and services that are available through Vocational Rehabilitation for students who are blind.

6. Vocational Rehabilitation staff will develop a support and mentoring group for college students who are blind.

Measures (the activities that will be achieved):

1. Vocational Rehabilitation staff will conduct or coordinate two informational sessions on the use of the major job search sites and provide individualized training to ten clients, consistent with the individual’s vocational goal.

Summary of Activities: Two information sessions were held. One session was held in Bridgeport with 8 attendees and the second session was held in Windsor with 7 attendees. The sessions reviewed the accessible job search sites that are featured on the agency website in the document titled “JOB SEARCH WEBSITES THAT ARE ACCESSIBLE WITH SCREEN READERS.”

Evaluation of Progress: This measure was achieved.

2. Two job seekers training programs will be offered and delivered to Vocational Rehabilitation clients on resume writing and interviewing techniques and strategies.

Summary of Activities: One job seekers training program was conducted in Hartford in July with 6 participants and the second was held in New London with as many as 11 participants attending at one time during ongoing sessions conducted between February and July.

Evaluation of Progress: This measure was achieved.

3. Each Vocational Rehabilitation Counselor with job placement responsibilities shall engage in an average of 2 hours per week in job development and job placement outreach to employers, including the use of internet based employer networking sites.

Summary of Activities: More than 1,000 hours of employer outreach activity occurred in the fiscal year, provided by 9 Vocational Rehabilitation Counseling staff. On average, 2.39 hours per week per Counselor were provided.

Evaluation of Progress: This measure was achieved.

4. Vocational Rehabilitation staff will conduct or coordinate the delivery of two training sessions in the use of smart-phone and tablet technologies for clients of the Vocational Rehabilitation Program.

Summary of Activities: Two training sessions occurred, one in July on the use of Android devices and the other in August on the use of iPhone devices. Both sessions were held at the Bureau’s location in Windsor, with a distance learning option being offered so clients could participate remotely if they desired. While the iPhone training was attended by 6 clients, the Android training only had 2 client participants, although 5 staff members who are legally blind attended as well.

Evaluation of Progress: This measure was achieved.
5. Vocational Rehabilitation staff will conduct in–service training sessions on the services available through this agency for disability coordinators at no less than 5 institutions of higher education in Connecticut, focusing specifically on colleges where Vocational Rehabilitation clients are currently enrolled.

Summary of Activities: This particular objective was developed in response to prior Consumer Satisfaction Survey results and sought to better educate disability coordinators at institutions of higher education on the services that BESB can provide and also to explain the expectations that the Bureau has of the colleges in regards to providing reasonable accommodations. In total, 15 staff from 13 institutions of higher education in Connecticut and 1 additional staff from a college in New York were provided with training. It is noted that the Consumer Satisfaction survey results obtained at the close of fiscal year 2014 showed a marked increase in the level of satisfaction with higher education services, going from a mean satisfaction rating of 5.0 out of 10 in 2012, to 7.8 out of 10 in 2013, and then to 8.7 out of 10 in 2014.

Evaluation of Progress: This measure was achieved.

6. The Vocational Rehabilitation Program will develop and implement a mentoring program for college students with a focus on connecting freshman students with seniors or recently graduated students who can provide insight and guidance on how to overcome the challenges and obstacles often encountered at college.

Summary of Activities: This objective produced both a formal and an informal approach toward mentoring. A mentoring panel was developed to discuss experiences with incoming freshman students, occurring in January. Offered as an in–person and telephonic event, there were 4 students who participated out of 11 new freshman students. Challenges in getting participation in this formal event led to the development of a more informal approach of connecting incoming college students with college seniors and recently graduated students. Plans were also put in place to offer a mentoring panel for high school students at the 2015 college on–campus program as well.

Evaluation of Progress: This measure was achieved.

GOAL B (the desired outcome)

INNOVATION AND EXPANSION: Expand and promote vocational services to groups of individuals who are legally blind who want to obtain, retain or advance in employment.

Objectives (The reasons the goal is of high importance):

1. There is a broad range of Vocational Rehabilitation services that benefit whole groups of individuals who are legally blind, who want to obtain, retain, or advance in employment.

Strategies (The methods for achieving the objectives):

1. The Vocational Rehabilitation Program will cosponsor NFB Newsline for clients of the agency to access educational, career and occupational outlook information.

2. Community–based adaptive technology centers will receive updated adaptive technology for people who are blind to engage in vocational preparation and job seeking activities.
3. The Vocational Rehabilitation Program will support and fund State Rehabilitation Council activities that promote awareness of services and supports available to people who are blind.

4. The Vocational Rehabilitation Program will cosponsor and implement leadership development opportunities for transition school–to–work students who are legally blind.

5. The State Rehabilitation Council will implement a client satisfaction survey to identify areas where improvements are necessary to better meet the rehabilitation goals of clients served by the Program.

Measures (the activities that will be achieved):

1. The agency enters into a contract with the National Federation of the Blind for NFB Newsline.

Summary of Activities: In collaboration with the National Federation of the Blind of Connecticut, NFB Newsline has been available for clients to access on an ongoing basis throughout the year. CRIS Radio continues to broadcast Newsline programming. BESB services have been featured on CRIS Radio, and a new program on employment has been launched by CRIS Radio, with BESB staff providing input into the development of topic areas for the program. In total, during the fiscal year, more than 412,000 minutes of use of the Newsline service occurred.

Evaluation of Progress: This measure was achieved.

2. The Vocational Rehabilitation Program provides technical assistance and purchases updated equipment, as needed, for at least one community–based technology center.

Summary of Activities: The Bureau continues to provide support and technical assistance to the technology laboratory at the Southeastern Connecticut Community Center of the Blind, and provided a new monitor for their facility during the year. At the present time, there are no other community based technology laboratories that are directly supported by BESB. The Bureau maintains a fully equipped technology laboratory at the office location in Windsor that is utilized for assessments and training of clients.

Evaluation of Progress: This measure was achieved.

3. On behalf of the SRC, the client satisfaction survey is conducted by an entity experienced in administering such surveys, and the SRC utilizes the results of this survey to develop two measureable strategies for continuous improvement.

Summary of Activities: The SRC commissioned the Center for Public Policy and Social Research (CPPSR) at Central Connecticut State University (CCSU) to conduct a consumer satisfaction survey of VR service recipients for fiscal year 2014. The purpose of the survey was to evaluate the services that consumers received from the Vocational Rehabilitation Program at BESB. In 2014, nine out of ten clients (90%) reported that they would recommend BESB Vocational Rehabilitation Services to a friend. Similar to both 2012 and 2013 survey findings, Rehabilitation and Adaptive Equipment and Low Vision were the two most widely used BESB services. Personal Care Attendant remained the least used service. Four services experienced an increase in mean satisfaction rating, while four saw a decline in rating. Reader Services had the largest mean increase (8.67, up 1.67 in mean rating). Personal Care Attendant Services climbed to its highest rating in five years (9.0, up 1.0 in mean rating). Higher Education Services set its second–best rating in the history of the survey (8.7, up .9 in mean rating). This figure is only second to the all–time high of 8.86 set in 2003. Small Business
Services also increased in ratings (7.14, up .39 in mean rating). Among the services experiencing a decline in reported satisfaction, Low Vision Services saw the most sizable decrease (7.89, down .9 in mean rating). Transportation Services experienced a notable decline (7.25, down .46 in mean rating), as did Skills Training Services (8.67, down .42). Rehabilitation and Adaptive Equipment Services registered a modest decline (8.60, down .20 in mean rating). Overall satisfaction with BESB services decreased to 7.96, down .48 in mean rating. Ratings on the extent to which services met clients’ IPE also saw a decline .42 in mean rating, coming in at 7.89. Satisfaction with the extent to which services met client expectations dropped to 7.46, down .33 in mean rating. Finally, satisfaction with the extent to which services met the needs of clients decreased to 8.16, down .19 in mean rating.

Average ratings of counselors were mixed in 2014 with four dimensions of counselors improved, one remained unchanged, and four declined in mean ratings. The counselors’ ability to provide information in a format that could use increased the most in satisfaction, coming in at 9.36, up 1.27 in mean rating. Counselors’ ability to help clients understand the process for complaint resolution also saw substantial improvement, setting an all-time high for this survey at 8.85, up 1.14 in mean rating. The professionalism of counselors achieved a mean rating of 9.06, up .27 in mean rating. Counselors’ ability to identify career goals climbed to the second-best average in the history of the survey at 8.05, up .27 in mean rating. Reports of counselors’ ability to help clients understand their vocational rehabilitation rights remained unchanged from last year (8.47, zero change in mean rating). The remaining four dimensions of counselors experienced declines in mean satisfaction ratings. Counselors’ ability to develop an IPE could not sustain the record-high ranking set in 2013 (7.84, down .39 in mean rating). Ratings of the knowledge of BESB counselors experienced an identical decline in mean ratings, (8.28, down .39 in mean rating). Counselors’ ability to recognize the special needs of their clients dropped to 7.84, down .38 in mean rating. Finally, client satisfaction of referrals dropped for the second consecutive year (8.20, down .20 in mean rating).

In fiscal year 2014, a Comprehensive Needs Assessment was also conducted by CPPSR. A complete overview of their findings and recommendations were included in the fiscal year 2015 state plan submission. In summary, based on the data collected for the assessment, CPPSR recommended that BESB develop a greater use of the internet to get the message out to a broader audience, ideally by expanding into social media and perhaps even posting videos onto YouTube that could highlight success stories. CPPSR also recommended that the Bureau’s website be updated and made easier to use for identifying services by categories of interest. CPPSR found merit in the newly-instituted college mentorship program and encouraged further development in this area. They also recommended that the Bureau should establish an internship program with local colleges and universities so that students majoring in human services and rehabilitation could gain real-world experience at the Bureau, and help to create a pipeline for addressing some longstanding concerns that BESB has been facing with staffing levels necessary to maintain higher levels of contact and engagement with clients.

Utilizing the results of the Consumer Satisfaction Survey and the Comprehensive Needs Assessment, the State Rehabilitation Council and the Vocational Rehabilitation Program established several objectives for the 2015 state plan. These objectives included establishment of mentoring videos for posting on the internet, reorganizing the Bureau’s web site to make it more user friendly, and implementing an internship program with local colleges and universities to bring student interns into BESB. Strategies were also identified for increasing the level of client access to career information by adding to each Individualized Plan for Employment information on the career identified in the plan. Additionally, there was a strategy identified to place greater emphasis on
offering and utilizing supported employment services to facilitate access into careers for clients with the most significant disabilities.

Evaluation of Progress: This measure was achieved.

4. The Vocational Rehabilitation Program cosponsors two leadership development programs for clients.

Summary of Activities: The Vocational Rehabilitation Program and the State Rehabilitation Council were cosponsors of the Youth Leadership Forum, a weeklong leadership development residential program, with 4 clients participating and 2 former client participants returning as counselor mentors. Additionally, BESB was a cosponsor of the Governor’s Coalition for Youth with Disabilities Scholarship event, recognizing the high school achievements of 3 students served by the Bureau. BESB further collaborated with Oak Hill to provide a weeklong residential leadership development and mentoring camp for transition age youth at Harkness, with 8 clients participating.

Evaluation of Progress: This measure was achieved.

5. The Vocational Rehabilitation Program sponsors the participation of SRC members at conferences and events that promote advocacy, service delivery and information exchange of best practices in the field of rehabilitation.

Summary of Activities: The SRC chairperson attended the National Council of State Agencies for the Blind (NCSAB) and the Council of State Administrators of Vocational Rehabilitation (CSAVR) national conferences in April. The chairperson attended conference seminars as well as participated in the visit to Washington, DC to meet with Connecticut’s Congressional delegation to educate them on how the VR Program assists people who are blind to achieve employment and self-sufficiency.

Evaluation of Progress: This measure was achieved.

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

While it is noted that all of the goals and objectives were achieved, the relatively low numbers of clients participating in training sessions that were held on topics ranging from adaptive technology to job seeking skills was below expectation. Challenges such as availability of transportation, and varied skill levels of clients contributed to these difficulties in attracting larger numbers of clients to participate in group training activities. Arranging for similarly skilled clients to attend trainings at a particular location for one or more sessions proved to be logistically difficult, and sometimes frustrating for the clients and the trainers. Even when offering virtual training options, the number of participants was still small. While these group training goals were certainly worthwhile, the time and resources required to plan for and implement these sessions has made the Program question if it would be more productive to utilize the training opportunities offered by fee for service providers, in addition to providing individualized and customized training through Bureau staff.
2. AN EVALUATION OF THE EXTENT TO WHICH THE SUPPORTED EMPLOYMENT PROGRAM GOALS DESCRIBED IN THE SUPPORTED EMPLOYMENT SUPPLEMENT FOR THE MOST RECENT PROGRAM YEAR WERE ACHIEVED. THE EVALUATION MUST:

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

Supported Employment Program Goals and Outcomes:

It is the primary goal to identify all possible providers of long–term funding for extended services. In addition to seeking out community rehabilitation providers who can financially assume the role of becoming the provider of extended services, the Vocational Rehabilitation Program established the goal to encourage employers to offer natural supports. The Program also sought to contract with community rehabilitation providers who could access public and private funds for people with multiple disabilities in order to secure supported employment placements. In Fiscal Year (FY) 2014, there were 3 clients who achieved employment outcomes in supported employment settings. The funding source for long–term support for 2 of these situations was the Department of Developmental Services, with the client’s family being the provider of long–term support in the third situation since the client works at a family–run business. Community rehabilitation providers were utilized for onsite training in all three situations. The Bureau has achieved these objectives by successfully accessing other funding sources including natural supports through a family operated business.

The Vocational Rehabilitation Program also established a goal of modifying Bureau policy to clearly reinforce that a successful employment outcome in a supported employment setting requires that the individual is compensated at or above the minimum wage, but not less than the customary wage and level of benefits paid by the employer for the same or similar work performed by individuals who are not disabled. This proposed policy change reflected the priorities of the Bureau and the State Rehabilitation Council to move away from placement options where the individual was working toward competitive wages that could potentially never be offered by the employer. With the proposed policy change, a shift to only permitting employment outcomes where the individual was earning the competitive and customary wage ensured that clients would be afforded the same level of earnings offered to their non–disabled coworkers. Subsequent to a public hearing process, this policy was changed and went into effect for October 1, 2015.

The Vocational Rehabilitation Program has also established a goal of participating in Planning and Placement Team meetings early in the transition process to identify the need for supported employment services, and to identify providers, both private and public, that may offer services while a student is preparing to transition from public or private education into employment. This is an area that continues to require more effort. Of the 14 new clients who were found eligible for supported employment services during the fiscal year, none of them were of transition–age. With the new reorganization in the Vocational Rehabilitation Program, assigning two counselors to work exclusively with transition–age students, it is anticipated that discussions regarding the option for employment with supports will become a much larger focal point in Planning and Placement Team meetings, with anticipated improvements in this category of service delivery occurring as a result.
B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES.

The challenging economy continues to impact on the scope and variety of job placement options available to clients, making customized employment particularly difficult to secure. The need for long–term funding support is an additional step that is necessary for supported employment placements at the onset. These two variables in combination make the timing challenging in filling job vacancies with a client who requires long–term supports. Dedicating two counselors to work specifically with the transition–age client population will facilitate discussions on supported employment options much earlier in the Planning and Placement Team process, starting as early as junior high school. This should allow for increased time to explore and secure long–term funding commitments and also to develop job opportunities for clients.

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

The Workforce Innovation and Opportunity Act established new measures of performance for the partner programs to collectively work towards achievement. The Vocational Rehabilitation Program is participating in discussions on the implementation of these new performance measures with the other partners at both the state and the regional level. However, as these are new measures of performance, outcomes cannot be reported on retrospectively. Under the Workforce Investment Act, Vocational Rehabilitation Programs reported on their performance in achieving established Standards and Indicators. What follows is a summary of this Bureau’s performance on these measures for FY 2014.

The first indicator addresses the overall number of individuals achieving employment outcomes in FY 2013 and FY 2014 in total, in comparison to the number of individuals achieving an employment outcome in total for fiscal years 2012 and 2013. The Program increased the total number of individuals achieving employment outcomes from 224 to 227 for these time periods, thereby passing the first indicator. The second indicator addresses the number of individuals who exit the Program in employment versus the number of individuals who exit the Program not in employment subsequent to the development of an employment plan. Eighty–two percent of Program participants exited the Program in employment in FY 2014, thereby achieving the required passing level of 68.9 percent. The third indicator addresses the number of individuals that exit the Program in competitive employment job categories as a percentage of all employment outcomes. Of the 227 individuals that achieved employment outcomes during the two–year time period, 205, or 90.3 percent achieved competitive wages, passing the required indicator level of 35.40 percent. Performance indicator 4 asks for the percentage of individuals achieving an employment outcome who are classified as having a significant disability as defined by the Rehabilitation Act. The Program passed this indicator, achieving 100 percent. The fifth indicator examines the hourly earnings of the individuals who achieved employment, requiring that the average hourly earnings of these individuals reach at least 59 percent of the Connecticut average hourly wage. For this state, the average hourly wage was $30.26 in 2014, so to pass the indicator, the Program would need to achieve $17.85 per hour on average for the clients who achieved employment. The Program passed this indicator, with the average hourly earnings reaching $18.58, or 61 percent of the Connecticut average hourly rate. The final indicator is the only one the Program was not able to pass in 2014. It examines the percentage of clients that report self–sustaining earnings at Program completion compared to those who indicated self–sustaining earnings at application. Since this Program provides a significant level of assistance to individuals who are employed at application and who are seeking assistance to retain their current employment or find new employment, it is common for applicants of services to have
competitive wages at the time of application. To pass this indicator, 30.4 percent of individuals who exited the Program in employment needed to have transitioned from other sources of support at application to self-sustaining earnings at closure. The Program was not able to reach this required percentage, with 17.1 percent of individuals moving from other sources of support at application to self-sustaining wages at closure.

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

During the fiscal year, Innovation and Expansion funding was utilized to cover the cost of the NFB Newsline service. Innovation and Expansion funds were also utilized to cover the cost of the State Rehabilitation Council’s co-sponsorship of the Youth Leadership Forum. The Vocational Rehabilitation Program also was a separate co-sponsor of this leadership development camp for transition-age students. Innovation and Expansion funding was also utilized to secure the Center for Public Policy and Social Research to conduct and analyze the 2014 consumer satisfaction survey and to report their findings to the State Rehabilitation Council for use in developing Program goals and priorities. Additionally, Innovation and Expansion funds were utilized to purchase adaptive technology for the technology training facility located at the Southeastern Connecticut Community Center of the Blind. Innovation and Expansion funding also made it possible for the Program to be a co-sponsor of the Governor’s Coalition for Youth with Disabilities, an initiative that awards college scholarships to graduating high school students with disabilities who are college bound. Lastly, funding was utilized to facilitate the participation of the State Rehabilitation Council, through its Chair to participate in national activities at the conferences of the National Council of State Agencies for the Blind and the Council of State Administrators of Vocational Rehabilitation.

Q. QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES.

Include the following:

1. THE QUALITY, SCOPE, AND EXTENT OF SUPPORTED EMPLOYMENT SERVICES TO BE PROVIDED TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

The Bureau of Education and Services for the Blind is committed to providing competitive employment opportunities in integrated settings to all clients of the Vocational Rehabilitation Program. The Program utilizes Title VI, Part B Funds, federal Vocational Rehabilitation Program funds and State matching funds to cover the costs of client placement into supported employment, and ensure that participants are provided with the necessary long-term support to succeed in the competitive labor market.

Supported Employment refers to competitive integrated employment, including customized employment, that is individualized and customized consistent with the strengths, abilities, interests, and informed choice of a client with a most significant disability, and that includes ongoing support services. Supported employment services may be considered for individuals for whom competitive integrated employment has not historically occurred, or for whom competitive integrated employment has been interrupted or intermittent, and where there is a need for extended services after the transition from support provided by the Bureau, in order for the client to perform this work. Supported employment may also be provided in the form of transitional employment services for individuals
with the most significant disabilities due to mental illness, in addition to legal blindness or lessened visual acuity.

Supported Employment Services are ongoing support services, including customized employment, and other appropriate services:

(A) Organized and made available, singly or in combination, in such a way as to assist an eligible individual to achieve competitive integrated employment;

(B) Based on a determination of the needs of an eligible individual, as specified in an Individualized Plan for Employment (IPE); and

(C) Provided by the Bureau for a period of not more than 24 months, unless under special circumstances the eligible individual and the rehabilitation counselor jointly agree to extend the time to achieve the employment outcome identified in the IPE; and

(D) Following transition to extended services, as post–employment services that are unavailable from an extended services provider, and that are necessary to maintain or regain the job placement or advance in employment.

Prior to determining that an applicant is unable to benefit from vocational rehabilitation services, the Vocational Rehabilitation Program must conduct an exploration of the individual’s abilities, capabilities, and capacity to perform in competitive integrated work situations. This is accomplished through the use of trial work experiences, which must be provided in competitive employment settings to the maximum extent possible, consistent with the informed choice and rehabilitation needs of the individual. Trial work experiences include supported employment, on–the–job training, and other experiences using realistic integrated work settings. Trial work experiences must be of sufficient variety and over a sufficient period of time for the Bureau to determine that there is sufficient evidence to conclude that the individual cannot benefit from the provision of vocational rehabilitation services in terms of a competitive integrated employment outcome. The Vocational Rehabilitation Program will provide appropriate supports, including assistive technology devices and services and personal assistance services to accommodate the rehabilitation needs of the individual during the trial work experiences.

For individuals who have been found eligible for services, an IPE shall be developed as soon as possible, but not later than a deadline of 90 days after the date of the determination of eligibility, unless the Bureau and the eligible individual agree to an extension of that deadline to a specific date by which the IPE shall be completed. If the Bureau is operating under an order of selection, this timeframe will apply to each eligible individual to whom the Bureau is able to provide services.

The Bureau will conduct an assessment for determining vocational rehabilitation needs, if appropriate, for each eligible individual or, if the Bureau is operating under an order of selection, for each eligible individual to whom the Bureau is able to provide services. The purpose of the assessment is to determine the employment outcome, and the nature and scope of vocational rehabilitation services, including the need for supported employment services, to be included in the IPE. The IPE will be designed to achieve the specific employment outcome that is selected by the individual consistent with the individual’s unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice, and results in competitive, integrated employment. The IPE will be amended, as necessary, by the individual or, as appropriate, the individual’s representative, in collaboration with a qualified vocational rehabilitation counselor employed by the
Bureau if there are substantive changes in the employment outcome, the vocational rehabilitation services to be provided, or the providers of the vocational rehabilitation services. For a student with a disability, the IPE will consider the student’s Individualized Education Program or 504 services.

For a supported employment outcome to be considered, the employment must be within an integrated work setting in the community that is at a location where the employee interacts with other persons who are not individuals with disabilities (not including supervisory personnel or individuals who are providing services to such employee) to the same extent that individuals who are not individuals with disabilities and who are in comparable positions interact with other persons, and that, as appropriate, presents opportunities for advancement that are similar to those for other employees who are not individuals with disabilities and who have similar positions.

The outcome must also be for paid employment where the client will be compensated at a wage that is not less than the rate specified in Section 6(a)(1) of the Fair Labor Standards Act of 1938 (29 U.S.C. 206(a)(1)) or the rate specified in the applicable State of Connecticut minimum wage law. The wage should not be less than the customary rate paid by the employer for the same or similar work performed by other employees who are not individuals with disabilities, and who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills. The client will also have access to the same level of employer–offered benefits that are available to similarly situated employees within the company.

For a client for whom an employment outcome in a supported employment setting has been determined to be appropriate, the IPE or subsequent amendment developed to include supported employment must identify:

(A) The supported employment services to be provided by the Vocational Rehabilitation Program;

(B) The extended services needed by the eligible individual, which may include natural supports;

(C) The source of extended services, or to the extent that the source of the extended services cannot be identified at the time of the development of the IPE, a description of the basis for concluding that there is a reasonable expectation that such a source will become available;

(D) Periodic monitoring to ensure that the individual is making satisfactory progress toward meeting the weekly work requirement established in the IPE by the time of transition to extended services;

(E) The coordination of services provided under an IPE with services provided under other individualized plans established under other federal or state programs;

(F) The extent that job skills training is provided, and identification that the training will be provided at the job site; and

(G) Placement in an integrated setting for the maximum number of hours possible based on the unique strengths, resources, priorities, concerns, abilities, capabilities, interests and informed choice of the individual.
2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

Extended Services in supported employment refer to ongoing support services and other appropriate services that are:

(A) Organized or made available, singly or in combination, in such a way as to assist an eligible individual in maintaining supported employment;

(B) Based on the needs of an eligible individual as specified in an IPE;

(C) Provided by a state agency, a private nonprofit organization, employer, or any other appropriate resource, after an individual has made the transition from support provided by the Bureau, and;

(D) Provided to youth with the most significant disabilities by the Bureau for a period of time as established by policies adopted by the Bureau, not to exceed 4 years.

Ongoing Support Services in supported employment are identified based on a determination by the Vocational Rehabilitation Program of the individual’s needs as specified in an IPE, and are furnished by the Vocational Rehabilitation Program from the time of job placement until transition to extended services, unless post–employment services are provided following transition, and thereafter by one or more extended service providers throughout the individual’s term of employment in a particular job placement or multiple placements if those placements are being provided under a program of transitional employment. These services include an assessment of employment stability and provision of specific services or the coordination of services at or away from the worksite that are needed to maintain stability based on:

(A) at a minimum, twice–monthly monitoring at the worksite of each individual in supported employment; or

(B) if under special circumstances, especially at the request of the individual, the IPE provides for off–site monitoring, twice monthly meetings with the individual, consisting of:

(1) Any particularized assessment supplementary to the comprehensive assessment of rehabilitation needs;

(2) The provision of skilled job trainers who accompany the individual for intensive job skill training at the worksite;

(3) Job development and training;

(4) Social skills training;

(5) Regular observation or supervision of the individual;

(6) Follow–up services including regular contact with the employers, the individuals, the parents, family members, guardians, advocates or authorized representatives of the individuals, and other suitable professional and informed advisors, in order to reinforce and stabilize the job placement;

(7) Facilitation of natural supports at the worksite;
(8) Any other service identified in the scope of vocational rehabilitation services in Bureau policy.

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate  
Department of Rehabilitation Services, Bureau of Education and Services for the Blind, Vocational Rehabilitation Program

Name of designated State agency  
Department of Rehabilitation Services

Full Name of Authorized Representative:  
Brian S. Sigman

Title of Authorized Representative:  
Director of Education and Rehabilitation, BESB

States must provide written and signed certifications that:

1. The designated State agency or designated State unit (as appropriate) listed above is authorized to submit the VR services portion of the Unified or Combined State Plan under title 1 of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA*, and its supplement under title VI of the Rehabilitation Act.**  
Yes

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the designated State agency listed above agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan;  
Yes

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan*, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;**  
Yes

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement;  
Yes

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement.  
Yes

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law.  
Yes
7. The **Authorized Representative listed above** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement;  **Yes**

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

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

**FOOTNOTES**

**Certification 1 Footnotes**

* Public Law 113-128.

** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

**Certification 2 Footnotes**

* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

** No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

*** Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

**Certification 3 Footnotes**

* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes

**ADDITIONAL COMMENTS ON THE CERTIFICATIONS FROM THE STATE**

**CERTIFICATION REGARDING LOBBYING — VOCATIONAL REHABILITATION**

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:
(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the
undersigned, to any person for influencing or attempting to influence an officer or employee of an
agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of
Congress in connection with the awarding of any Federal contract, the making of any Federal grant,
the making of any Federal loan, the entering into of any cooperative agreement, and the extension,
continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or
cooperative agreement.

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

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

STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

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

Applicant's Organization      Department of Rehabilitation Services, Bureau of Education and
Services for the Blind

Full Name of Authorized Representative:   Brian S. Sigman

Title of Authorized Representative:   Director of Education and Rehabilitation, Bureau of
Education and Services for the Blind

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
e-mail 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: Department of Rehabilitation Services, Bureau of Education and Services for the Blind

Full Name of Authorized Representative: Brian S. Sigman

Title of Authorized Representative: Director of Education and Rehabilitation, Bureau of Education and Services for the Blind
ASSURANCES

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

1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

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

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

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

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

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

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

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

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


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

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

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

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

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

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

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

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


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

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

4. ADMINISTRATION OF THE PROVISION OF VR SERVICES:

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

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

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

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

Agency will provide the full range of services described above

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

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

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

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

H. COMPLY WITH THE REQUIREMENTS FOR THE CONDUCT OF SEMIANNUAL OR ANNUAL REVIEWS, AS APPROPRIATE, FOR INDIVIDUALS EMPLOYED EITHER IN
AN EXTENDED EMPLOYMENT SETTING IN A COMMUNITY REHABILITATION PROGRAM OR ANY OTHER EMPLOYMENT UNDER SECTION 14(C) OF THE FAIR LABOR STANDARDS ACT OF 1938, AS REQUIRED BY SECTION 101(A)(14) OF THE REHABILITATION ACT.

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

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

I. HAS DEVELOPED AND WILL IMPLEMENT,

A. STRATEGIES TO ADDRESS THE NEEDS IDENTIFIED IN THE ASSESSMENTS; AND

B. STRATEGIES TO ACHIEVE THE GOALS AND PRIORITIES IDENTIFIED BY THE STATE, TO IMPROVE AND EXPAND VOCATIONAL REHABILITATION SERVICES FOR STUDENTS WITH DISABILITIES ON A STATEWIDE BASIS; AND

II. HAS DEVELOPED AND WILL IMPLEMENT STRATEGIES TO PROVIDE PRE-EMPLOYMENT TRANSITION SERVICES (SECTIONS 101(A)(15) AND 101(A)(25)).

5. PROGRAM ADMINISTRATION FOR THE SUPPORTED EMPLOYMENT TITLE VI SUPPLEMENT:

A. THE DESIGNATED STATE UNIT ASSURES THAT IT WILL INCLUDE IN THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN ALL INFORMATION REQUIRED BY SECTION 606 OF THE REHABILITATION ACT.

B. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL SUBMIT REPORTS IN SUCH FORM AND IN ACCORDANCE WITH SUCH PROCEDURES AS THE COMMISSIONER MAY REQUIRE AND COLLECTS THE INFORMATION REQUIRED BY SECTION 101(A)(10) OF THE REHABILITATION ACT SEPARATELY FOR INDIVIDUALS RECEIVING SUPPORTED EMPLOYMENT SERVICES UNDER TITLE I AND INDIVIDUALS RECEIVING SUPPORTED EMPLOYMENT SERVICES UNDER TITLE VI OF THE REHABILITATION ACT.

C. THE DESIGNATED STATE UNIT WILL COORDINATE ACTIVITIES WITH ANY OTHER STATE AGENCY THAT IS FUNCTIONING AS AN EMPLOYMENT NETWORK UNDER THE TICKET TO WORK AND SELF-SUFFICIENCY PROGRAM UNDER SECTION 1148 OF THE SOCIAL SECURITY ACT.

6. FINANCIAL ADMINISTRATION OF THE SUPPORTED EMPLOYMENT PROGRAM:
A. The designated state agency assures that it will expend no more than 2.5 percent of the state’s allotment under Title VI for administrative costs of carrying out this program; and, the designated state agency or agencies will provide, directly or indirectly through public or private entities, non-federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under Section 603(d) of the Rehabilitation Act, in accordance with Section 606(b)(7)(g) and (h) of the Rehabilitation Act.

B. The designated state agency assures that it will use funds made available under Title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with Section 606(b)(7)(a) and (d), of the Rehabilitation Act.

7. Provision of Supported Employment Services:

A. The designated state agency assures that it will provide supported employment services as defined in Section 7(39) of the Rehabilitation Act.

B. The designated state agency assures that:

I. The comprehensive assessment of individuals with significant disabilities conducted under Section 102(b)(1) of the Rehabilitation Act and funded under Title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of Section 606(b)(7)(b) of the Rehabilitation Act.

II. An individualized plan for employment that meets the requirements of Section 102(b) of the Rehabilitation Act, which is developed and updated with Title I funds, in accordance with Sections 102(b)(3)(f) and 606(b)(6)(c) and (e) of the Rehabilitation Act.

Additional comments on the assurances from the state
VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and the Vocational Rehabilitation Program—and also submit relevant information for any of the eleven partner programs it includes in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program.* If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II and III of that document, where specified, as well as the program-specific requirements for that program (available on www.regulations.gov for public comment). The requirements that a State must address for any of the partner programs it includes in its Combined State Plan are provided in this separate supplemental document. The Departments are not seeking comments on these program-specific requirements, which exist under separate OMB control numbers and do not represent requirements under WIOA. For further details on this overall collection, access the Federal eRulemaking Portal at http://www.regulations.gov by selecting Docket ID number ETA-2015-0006.

* States that elect to include employment and training activities carried out under the Community Services Block Grant (CSBG) Act (42 U.S.C. 9901 et seq.) under a Combined State Plan would submit all other required elements of a complete CSBG State Plan directly to the Federal agency that administers the program. Similarly, States that elect to include employment and training activities carried by the Department of Housing and Urban Development and programs authorized under section 6(d)(4) and 6(o) of the Food and Nutrition Act of 2008 that are included would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.
APPENDIX 1. PERFORMANCE GOALS FOR THE CORE PROGRAMS

Include the State's expected levels of performance relating to the performance accountability indicators based on primary indicators of performance described in section 116(b)(2)(A) of WIOA.

Instructions: Performance Goals for the Core Programs

Each State submitting a Unified or Combined Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The State is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education on state adjusted levels of performance for the indicators for each of the first two years of the plan.
<table>
<thead>
<tr>
<th>Program</th>
<th>PY 2016 Proposed/Expected Level</th>
<th>PY 2016 Negotiated/Adjusted Level</th>
<th>PY 2017 Proposed/Expected Level</th>
<th>PY 2017 Negotiated/Adjusted Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adults</td>
<td>56.00</td>
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<td>Dislocated Workers</td>
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<td>Youth</td>
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<td>64.00</td>
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<tr>
<td>Adult Education</td>
<td>Baseline</td>
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<td>Baseline</td>
</tr>
<tr>
<td>Wagner-Peyser</td>
<td>56.00</td>
<td>Baseline</td>
<td>56.00</td>
<td>Baseline</td>
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<tr>
<td>Vocational Rehabilitation</td>
<td>Baseline</td>
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<td>Baseline</td>
<td>Baseline</td>
</tr>
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</table>

User remarks on Table 1
<table>
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<tr>
<th>Program</th>
<th>PY 2016 Proposed/Expected Level</th>
<th>PY 2016 Negotiated/Adjusted Level</th>
<th>PY 2017 Proposed/Expected Level</th>
<th>PY 2017 Negotiated/Adjusted Level</th>
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<tbody>
<tr>
<td>Adults</td>
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User remarks on Table 2
# Table 3: Median Earnings (Second Quarter After Exit)

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<tr>
<th>Program</th>
<th>PY 2016 Proposed/Expected Level</th>
<th>PY 2016 Negotiated/Adjusted Level</th>
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User remarks on Table 3
### TABLE 4. CREDENTIAL ATTAINMENT RATE

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<th>Program</th>
<th>PY 2016 Proposed/Expected Level</th>
<th>PY 2016 Negotiated/Adjusted Level</th>
<th>PY 2017 Proposed/Expected Level</th>
<th>PY 2017 Negotiated/Adjusted Level</th>
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<td>Adults</td>
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<td>Baseline</td>
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<td>Dislocated</td>
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<td>Workers</td>
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<td>Youth</td>
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</tbody>
</table>

**User remarks on Table 4**
## TABLE 5. MEASUREABLE SKILL GAINS

<table>
<thead>
<tr>
<th>Program</th>
<th>PY 2016 Proposed/ Expected Level</th>
<th>PY 2016 Negotiated/ Adjusted Level</th>
<th>PY 2017 Proposed/ Expected Level</th>
<th>PY 2017 Negotiated/ Adjusted Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adults</td>
<td>30.00</td>
<td>Baseline</td>
<td>31.00</td>
<td>Baseline</td>
</tr>
<tr>
<td>Dislocated Workers</td>
<td>38.00</td>
<td>Baseline</td>
<td>39.00</td>
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</tr>
<tr>
<td>Youth</td>
<td>55.00</td>
<td>Baseline</td>
<td>56.00</td>
<td>Baseline</td>
</tr>
<tr>
<td>Adult Education</td>
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<td>43.00</td>
<td>50.00</td>
<td>45.00</td>
</tr>
<tr>
<td>Wagner-Peyser</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Vocational Rehabilitation</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
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</tr>
</tbody>
</table>

**User remarks on Table 5**
### TABLE 6. EFFECTIVENESS IN SERVING EMPLOYERS

<table>
<thead>
<tr>
<th>Program</th>
<th>PY 2016 Proposed/Expected Level</th>
<th>PY 2016 Negotiated/Adjusted Level</th>
<th>PY 2017 Proposed/Expected Level</th>
<th>PY 2017 Negotiated/Adjusted Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adults</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
</tr>
<tr>
<td>Dislocated Workers</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
</tr>
<tr>
<td>Youth</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
</tr>
<tr>
<td>Adult Education</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
</tr>
<tr>
<td>Wagner-Peyser</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
</tr>
<tr>
<td>Vocational Rehabilitation</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
<td>Baseline</td>
</tr>
</tbody>
</table>

User remarks on Table 6
### TABLE 7. COMBINED FEDERAL PARTNER MEASURES

<table>
<thead>
<tr>
<th>Measure</th>
<th>PY 2016 Proposed/Expected Level</th>
<th>PY 2016 Negotiated/Adjusted Level</th>
<th>PY 2017 Proposed/Expected Level</th>
<th>PY 2017 Negotiated/Adjusted Level</th>
</tr>
</thead>
</table>

User remarks on Table 7