WIOA STATE PLAN FOR THE STATE OF TEXAS FY-2018

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OVERVIEW

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

OPTIONS FOR SUBMITTING A STATE PLAN

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

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

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

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

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

HOW STATE PLAN REQUIREMENTS ARE ORGANIZED

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

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

- State Strategy Implementation,
- State Operating Systems and Policies,
- Assurances, and
- Program-Specific Requirements for the Core Programs, and
- Program-Specific Requirements for the Combined State Plan partner programs. (These requirements are available in a separate supplemental document, Supplement to the Workforce and Innovation Act (WIOA) Unified and Combined State Plan Requirements. The Departments are not seeking comments on these particular requirements).

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

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

Introduction

The Texas Workforce Commission's (TWC) Combined State Plan for the Workforce Innovation and Opportunity Act (WIOA) for Program Years 2016-2019 was submitted to the US Departments of Labor and Education on April 1, 2016, and was approved on October 20, 2016. WIOA §676.145(a)(1) requires states to submit modifications to the Combined State Plan (CSP) at the conclusion of the first two-year period of a four-year plan. The modifications are to "reflect changes in labor market and economic conditions or other factors affecting the implementation of the Combined State Plan."

TWC has submitted plan modifications and amendments during the first two years covered by the plan. These modifications included the transfer of the state's vocational rehabilitation (VR) program from the Texas Department of Assistive and Rehabilitative Services (DARS) to TWC, the combination of the former DARS Division for Rehabilitation Services and Division for Blind Services into one designated state unit, and the redesignation of the Coastal Bend and Alamo local workforce development areas (workforce areas).

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Texas proposes through this Combined State Plan (plan) to implement jointly administered activities concerning the following core programs and two optional programs authorized by the Workforce Innovation and Opportunity Act (WIOA):

- The Adult, Dislocated Worker, and Youth programs
- The Wagner-Peyser Employment Service (ES) program, including the Agricultural Outreach Plan
- The Adult Education and Family Literacy Act program
- The Vocational Rehabilitation program
- The Senior Community Service Employment Program

Currently, the Texas Workforce Commission (TWC) has oversight authority for all of the aforementioned programs with the exception of the vocational rehabilitation program, which is currently housed at the Texas Department of Assistive and Rehabilitative Services (DARS). However, on June 19, 2015, Texas Governor Greg Abbott signed into law Senate Bill (SB) 208, which directs the transfer of several programs from DARS to TWC. Effective September 1, 2016, the General Vocational Rehabilitation program, Blind Vocational Rehabilitation program, and grant for Independent Living Services for Older Individuals Who are Blind, will transfer to TWC.

The Rehabilitation Council of Texas (RCT) also transfers to TWC on September 1, 2016. The RCT serves as the State Rehabilitation Council required under the federal Rehabilitation Act of 1973, as amended by WIOA. The RCT consults on the preparation of the vocational rehabilitation (VR) state plans and advises the agency administering VR programs on policy, the scope and effectiveness of VR services, and the development of state goals and priorities for the VR program.

As this plan covers the period of July 1, 2016, through June 30, 2020, the plan is written to represent a workforce system in which all core programs set forth in WIOA are under the purview of TWC. Both TWC and DARS have a demonstrated history of collaboration, ensuring that individuals in need of services receive the highest level of quality and attention, driving positive outcomes for system stakeholders. This collaboration will continue through the transition.

As part of the transition process, the agencies will look for opportunities to enhance efficiencies and streamline operations, while meeting all federal requirements and improving overall employment outcomes. TWC and DARS have publicly committed to ensuring that:

- there is no disruption of services to consumers;
- DARS employees transfer to TWC with no disruptions; and
- all federal requirements are met in order to maintain the current level of federal funding support for the programs.

TWC, in partnership with 28 Local Workforce Development Boards (Boards) and its contractors and service providers, forms Texas Workforce Solutions, a workforce development system available to employers, workers, job seekers, and youth throughout the state. Texas Workforce Solutions provides vital workforce development tools that help workers find and keep good jobs, and help employers hire the skilled workers they need to grow their businesses. Through one-stop centers (i.e., Workforce Solutions Offices) across the state, and in collaboration with workforce partners, including community colleges, adult basic education providers, local independent school districts, economic development groups, and other state agencies, Texas Workforce Solutions provides innovative services to support employers and workers. Collaboration and coordination across these agencies and local entities play a critical role in the success of the Texas workforce system.

The programs discussed in this plan reflect only a portion of the programs administered by TWC. Through the integrated workforce system in Texas, TWC also administers several other federal programs:

- Choices [the employment program for recipients of Temporary Assistance for Needy Families (TANF)]
- Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)

- Child Care and Development Block Grant Funds/Child Care Development Funds (CCDBG/CCDF)
- Trade Adjustment Assistance (TAA)

TWC also administers state-funded workforce development programs, including:

- Apprenticeship
- Skills Development Fund training (customized training for businesses)
- Self-Sufficiency Fund training
- Jobs and Education for Texans (JET) (grants for community colleges, nonprofit organizations, and school districts that provide opportunities for students to pursue new career and technical education programs in high-growth industries)

Through this highly integrated system, TWC intends to implement enhancements that continue to strengthen the state's workforce development system to put more Texans to work. The plan describes a four-year strategy that spurs skill and credential attainment, employment, retention, and earnings of participants, including those with barriers to employment, resulting in a higher quality workforce, reduced welfare dependency, and increased productivity and competitiveness in the state.

The plan complies with WIOA by aligning its core programs and two optional programs to the state's workforce investment, education, and economic development systems, as discussed in the unified strategic planning requirements, common performance accountability measures, and requirements governing the one-stop delivery system. As WIOA intended, the plan serves as a map to develop, align, and integrate the entire system across federal education, employment, and training programs. The plan enumerates the state's vision and strategic and operational goals for providing workforce services and continuously improving the quality and performance of its system.

I. WIOA STATE PLAN TYPE

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

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

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

COMBINED PLAN PARTNER PROGRAM(S)

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

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

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

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

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

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

II. STRATEGIC ELEMENTS

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

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

III. EMPLOYERS' EMPLOYMENT NEEDS

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

For the Texas economy to grow and prosper, employers must convey to job seekers the skills their businesses need. Conversely, job seekers must recognize and promote the skills they possess, or obtain new or upgraded skills to meet businesses' needs. The state's market-driven workforce development system plays a vital role in this process, acting as a hub for sharing information related to jobs and skills, facilitating connections between businesses and job seekers, and providing assistance with job search and training needs. Boards and their contractors work collaboratively to ensure that these services and assistance are available to all employers and job seekers, including veterans, individuals with disabilities, older adults, and others.

The Texas economy continues to outpace the national economy. Over the past year, Texas added jobs in 10 of the 11 major industries.

The opportunities that come with a growing economy and expanding workforce are many and varied. TWC and its workforce development partners will continue to collaborate with community and industry partners to expand these opportunities and find new ways to achieve positive results. The development of innovative workforce services to meet the needs of employers and workers is vital to the success of the workforce system.

As businesses expand their operations and new employers emerge during this period of rapid technology advancements, there is a growing opportunity to assist with workforce skills development and training. The gap between in-demand skills and available labor force skills must be addressed at all levels. This includes the availability of technical training opportunities as well as efforts to increase the number of skilled craft specialists. Increased development of regional collaborations with employers, Boards, community colleges, and other training providers will be engaged to address this opportunity.

TWC uses long-term projections data to identify industries likely to grow the fastest. Growth assumes, in part, an adequate supply of workers with relevant skills. Positive growth continues to drive demand for workers in Texas and across the nation. In some key occupations, local supply has at times struggled to keep up with demand. Texas remains driven by a continued economic shift toward high-skilled jobs in the business and professional services sector, while the state's rapid population growth and aging baby-boomer population increases demand for service-sector jobs, primarily Leisure and Hospitality and Education and Health Services. These three industries, in addition to Trade, Transportation, and Utilities, account for over 55 percent of the jobs in Texas.

The following industries in Texas are projected to experience the highest growth during 2014-2024.

Industry Title	2014 Emp	2024 Emp	Growth	% Growth
Health Care & Social Assistance	1,430,720	1,891,930	461,210	32.2%
Management of Companies & Enterprises	108,860	143,470	34,610	31.8%
Accommodation & Food Services	1,061,850	1,377,030	315,180	29.7%
Construction	638,530	815,920	177,390	27.8%
Professional & Technical Services	640,810	808,850	168,040	26.2%
Administrative & Waste Services	715,960	900,900	184,940	25.8%
Arts, Entertainment, & Recreation	122,750	150,190	27,440	22.4%
Wholesale Trade	535,170	653,600	118,430	22.1%
Transportation & Warehousing	460,380	561,080	100,700	21.9%
Educational Services, Public & Private	1,188,110	1,445,670	257,560	21.7%
Retail Trade	1,244,930	1,494,870	249,940	20.1%

Industry Title	2014 Emp	2024 Emp	Growth	% Growth
Other Services, Ex. Government	462,090	553,990	91,900	19.9%
Utilities	47,960	56,510	8,550	17.8%
Finance & Insurance	487,200	572,960	85,760	17.6%
Real Estate & Rental & Leasing	193,270	226,480	33,210	17.2%
Government	679,460	767,360	87,900	12.9%
Information	195,330	219,260	23,930	12.3%

Of these industries, Management of Companies and Enterprises continues to be an emerging industry because that industry has the second-highest growth rate for employment, but it is among the three smallest industries in Texas when ranked by 2014 employment. Utilities is the smallest industry noted in the chart above. Nonetheless, it is projected to grow at 17.8 percent from 2014-2024, adding 8,550 private-sector jobs during that time. This growth is likely due to the increased infrastructure needs for Texas' rapidly expanding population.

The occupations within the Utilities industry projected to add the most jobs that pay above the statewide median wage of $35,484 a year are listed below.

Occupational Title	2014 Emp	2024 Emp	Growth	% Growth
Electrical Power-Line Installers and Repairers	4,580	5,400	820	17.9%
Industrial Machinery Mechanics	1,150	1,630	480	41.7%
Power Plant Operators	2,590	3,060	470	18.1%
Customer Service Representatives	2,170	2,550	380	17.5%
Water and Wastewater Treatment Plant and System Operators	1630	1930	300	18.4%
Wind Turbine Service Technicians	210	510	300	142.9%
Control and Valve Installers and Repairers, Except Mechanical Door	1,460	1,720	260	17.8%
Supervisors of Mechanics, Installers, and Repairers	1,350	1,590	240	17.8%
General and Operations Managers	1,350	1,590	240	17.8%
Office Clerks, General	1,800	2,020	220	12.2%

Long-term projections data also points to the industries likely to have the largest absolute employment growth over the projected period. These "existing" industries are among the largest by estimated employment size.

The following industries in Texas are projected to experience the largest employment growth in 2014-2024.

Industry Title	2014 Emp	2024 Emp	Growth	% Growth
Health Care & Social Assistance	1,430,720	1,891,930	461,210	32.2%
Accommodation & Food Services	1,061,850	1,377,030	315,180	29.7%
Educational Services, Public & Private	1,188,110	1,445,670	257,560	21.7%
Retail Trade	1,244,930	1,494,870	249,940	20.1%
Administrative & Waste Services	715,960	900,900	184,940	25.8%
Construction	638,530	815,920	177,390	27.8%
Professional & Technical Services	640,810	808,850	168,040	26.2%
Wholesale Trade	535,170	653,600	118,430	22.1%
Transportation & Warehousing	460,380	561,080	100,700	21.9%
Other Services, Ex. Government	462,090	553,990	91,900	19.9%
Government	679,460	767,360	87,900	12.9%
Finance & Insurance	487,200	572,960	85,760	17.6%
Manufacturing	882,030	945,130	63,100	7.2%
Management of Companies & Enterprises	108,860	143,470	34,610	31.8%
Real Estate & Rental & Leasing	193,270	226,480	33,210	17.2%
Arts, Entertainment, & Recreation	122,750	150,190	27,440	22.4%
Information	195,330	219,260	23,930	12.3%

Of these industries, the first four (Health Care and Social Assistance; Accommodation and Food Services; Educational Services, Public and Private; and Retail Trade) indicate projected employment levels of more than one million jobs by 2024, and growth at well over 200,000 jobs.

The Health Care and Social Assistance industry employment has grown to 1,530,608 positions as of the first quarter of 2017, averaging a 3.1 percent annual growth over the past five years. According to long-term industry projections, Health Care and Social Assistance employment is expected to grow to approximately 1,892,000 jobs by 2024, posting the strongest growth of the industries listed in the previous table at 32.2 percent.

Ambulatory Health Care Services, which consists of doctors' and dentists' offices, outpatient care centers, and medical and diagnostic laboratories, was a driving force behind the growth seen in this industry. It comprises about 47 percent of the Health Care and Social Assistance industry and averaged an annual growth of 3.2 percent over the past five years.

The demand for health care workers in Texas is expected to continue to increase, as the state has growing populations of senior citizens and young people, both groups of which are the primary customers of health care and social assistance. This sector is also faced with training challenges, as employers are demanding more highly educated workers due to market demand and industry expectations. Additionally, this industry is confronted with high turnover in key occupations, which intensifies worker demand.

Occupational Title	2014 Emp	2024 Emp	Growth	% Growth
Registered Nurses	168,960	225,170	56,210	33.3%
Licensed Practical and Licensed Vocational Nurses	58,430	75,000	16,570	28.4%
Office Clerks, General	37,670	47,550	9,880	26.2%
Dental Assistants	23,620	30,090	6,470	27.4%
Medical and Health Services Managers	15,990	21,030	5,040	31.5%
Physical Therapists	11,380	15,580	4,200	36.9%
Medical Records and Health Information Technicians	12,700	16,750	4,050	31.9%
General and Operations Managers	11,770	15,700	3,930	33.4%
Radiologic Technologists	14,340	18,020	3,680	25.7%
Nurse Practitioners	6,850	10,460	3,610	52.7%

Long-term projections data is helpful in ranking occupations in Texas, without reference to industry both in terms of percentage growth and in absolute growth between 2014 and 2024.

The following occupations are projected to experience the highest growth among all industries in 2014-2024.

Occ Code	Occupational Title	2014 Emp	2024 Emp	Growth	% Growth
31-2011	Occupational Therapy Assistants	3,720	5,560	1,840	49.5%

Occ Code	Occupational Title	2014 Emp	2024 Emp	Growth	% Growth
29-1171	Nurse Practitioners	8,090	11,970	3,880	48.0%
29-2032	Diagnostic Medical Sonographers	4,570	6,650	2,080	45.5%
15-2031	Operations Research Analysts	7,980	11,570	3,590	45.0%
47-2171	Reinforcing Iron & Rebar Workers	3,830	5,520	1,690	44.1%
31-2021	Physical Therapist Assistants	6,110	8,760	2,650	43.4%
29-2031	Cardiovascular Technologists & Technicians	4,570	6,530	1,960	42.9%
29-1071	Physician Assistants	5,960	8,510	2,550	42.8%
27-3091	Interpreters & Translators	4,860	6,930	2,070	42.6%
35-2014	Cooks, Restaurant	88,320	124,570	36,250	41.0%
31-1011	Home Health Aides	63,550	88,710	25,160	39.6%
39-9021	Personal Care Aides	197,590	274,460	76,870	38.9%
15-1134	Web Developers	10,110	13,810	3,700	36.6%
35-3021	Combined Food Preparation & Serving Workers, Incl. Fast Food	285,560	386,490	100,930	35.3%
29-2099	Health Technologists & Technicians, All Other	6,550	8,860	2,310	35.3%
29-1123	Physical Therapists	13,110	17,660	4,550	34.7%
29-2057	Ophthalmic Medical Technicians	3,460	4,660	1,200	34.7%
31-2022	Physical Therapist Aides	5,540	7,450	1,910	34.5%
31-9092	Medical Assistants	55,600	74,690	19,090	34.3%

Occ Code	Occupational Title	2014 Emp	2024 Emp	Growth	% Growth
49-9044	Millwrights	3,180	4,270	1,090	34.3%
31-9097	Phlebotomists	8,550	11,480	2,930	34.3%
35-1012	First-Line Supervisors of Food Preparation & Serving Workers	77,860	104,410	26,550	34.1%
29-1061	Anesthesiologists	2,940	3,940	1,000	34.0%
29-1151	Nurse Anesthetists	3,070	4,110	1,040	33.9%
47-3013	Helpers—Electricians	8,680	11,620	2,940	33.9%

NOTE: Occupations in this list must have 2,500 or more employment in 2014.

The Strategic Workforce Assessment Program (SWAP), an Internet-based analysis tool created by Labor Market and Career Information (LMCI) staff, tabulates the knowledge, skills, and abilities appearing most often in the profiles of detailed work activities (DWAs) for groups of occupations, weighted by regional employment.

The following table shows the prime knowledge, skills, and abilities employers most commonly require for the occupations in the above table.

Prime Knowledge Areas	Prime Skills	Prime Abilities
Medicine and Dentistry	Complex Problem Solving	Oral Expression
Customer and Personal Service	Operation and Control	Problem Sensitivity
Administration and Management	Service Orientation	Written Expression
Food Production	Critical Thinking	Deductive Reasoning
Therapy and Counseling	Speaking	Information Ordering

Prime Knowledge Areas:

- Medicine and Dentistry—Knowledge of the information and techniques needed to diagnose and treat human injuries, diseases, and deformities. This includes symptoms, treatment alternatives, drug properties and interactions, and preventive health-care measures.

- Customer and Personal Service—Knowledge of principles and processes for providing customer and personal services. This includes customer needs assessment, meeting quality standards for services, and evaluation of customer satisfaction.
- Administration and Management—Knowledge of business and management principles involved in strategic planning, resource allocation, human resources modeling, leadership technique, production methods, and coordination of individuals and resources.
- Food Production—Knowledge of techniques and equipment for planting, growing, and harvesting food products (both plant and animal) for consumption, including storage/handling techniques.
- Therapy and Counseling—Knowledge of principles, methods, and procedures for diagnosis, treatment, and rehabilitation of physical and mental dysfunctions, and for career counseling and guidance.

Prime Skills:

- Complex Problem Solving—Identifying complex problems and reviewing related information to develop and evaluate options and implement solutions.
- Operation and Control—Controlling operations of equipment or systems.
- Service Orientation—Actively looking for ways to help people.
- Critical Thinking—Using logic and reasoning to identify the strengths and weaknesses of alternative solutions, conclusions, or approaches to problems.
- Speaking—Talking to others to convey information effectively.

Prime Abilities:

- Oral Expression—The ability to communicate information and ideas in speaking so others will understand.
- Problem Sensitivity—The ability to tell when something is wrong or is likely to go wrong. It does not involve solving the problem, only recognizing that there is a problem.
- Written Expression—The ability to communicate information and ideas in writing so others will understand.
- Deductive Reasoning—The ability to apply general rules to specific problems to produce answers that make sense.
- Information Ordering—The ability to arrange things or actions in a certain order or pattern according to a specific rule or set of rules (for example, patterns of numbers, letters, words, pictures, mathematical operations).

The following occupations in Texas are projected to experience the largest employment growth between 2014 and 2024.

Occ Code	Occupational Title	2014 Emp	2024 Emp	Growth	% Growth

Occ Code	Occupational Title	2014 Emp	2024 Emp	Growth	% Growth
35-3021	Combined Food Preparation & Serving Workers, Incl. Fast Food	285,560	386,490	100,930	35.3%
41-2031	Retail Salespersons	382,500	473,300	90,800	23.7%
39-9021	Personal Care Aides	197,590	274,460	76,870	38.9%
29-1141	Registered Nurses	197,270	258,880	61,610	31.2%
43-4051	Customer Service Representatives	240,270	299,810	59,540	24.8%
43-9061	Office Clerks, General	346,800	401,950	55,150	15.9%
35-3031	Waiters & Waitresses	204,630	256,870	52,240	25.5%
41-2011	Cashiers	259,930	304,470	44,540	17.1%
37-2011	Janitors & Cleaners, Ex. Maids & Housekeeping Cleaners	174,440	218,880	44,440	25.5%
53-3032	Heavy & Tractor-Trailer Truck Drivers	187,610	226,580	38,970	20.8%
53-7062	Laborers & Freight, Stock, & Material Movers	172,150	209,070	36,920	21.4%
35-2014	Cooks, Restaurant	88,320	124,570	36,250	41.0%
11-1021	General & Operations Managers	170,280	205,900	35,620	20.9%
25-2021	Elementary School Teachers, Ex. Special Education	138,870	172,990	34,120	24.6%
47-2061	Construction Laborers	129,800	163,250	33,450	25.8%
43-5081	Stock Clerks & Order Fillers	154,080	185,140	31,060	20.2%
43-6014	Secretaries & Admin Assistants, Ex. Legal/Medical/Executive	191,270	220,870	29,600	15.5%

Occ Code	Occupational Title	2014 Emp	2024 Emp	Growth	% Growth
13-2011	Accountants & Auditors	122,640	151,650	29,010	23.7%
43-6013	Medical Secretaries	83,880	110,800	26,920	32.1%
35-1012	First-Line Supervisors of Food Preparation & Serving Workers	77,860	104,410	26,550	34.1%
31-1011	Home Health Aides	63,550	88,710	25,160	39.6%
31-1014	Nursing Assistants	83,800	108,950	25,150	30.0%
25-2031	Secondary School Teachers, Ex Special/Career/Technical Ed	100,950	125,740	24,790	24.6%
41-4012	Sales Reprs, Wholesale/Mfg, Ex Technical/Scientific Products	117,870	141,780	23,910	20.3%
43-1011	First-Line Supervisors of Office & Admin Support Workers	115,090	138,930	23,840	20.7%

The table below shows the skills employers most commonly require for the occupations in the above table that are projected to add the most jobs in Texas during the reference period.

Prime Knowledge Areas	Prime Skills	Prime Abilities
Customer and Personal Service	Writing	Oral Expression
Clerical	Complex Problem Solving	Information Ordering
Administration and Management	Critical Thinking	Written Expression
Sales and Marketing	Speaking	Deductive Reasoning
Economics and Accounting	Management of Material Resources	Inductive Reasoning

Prime Knowledge Areas:

- Customer and Personal Service—Knowledge of principles and processes for providing customer and personal services. This includes customer needs assessment, meeting quality standards for services, and evaluation of customer satisfaction.
- Clerical—Knowledge of administrative and clerical procedures and systems such as word processing, managing files and records, stenography and transcription, designing forms, and other office procedures and terminology.
- Administration and Management—Knowledge of business and management principles involved in strategic planning, resource allocation, human resources modeling, leadership technique, production methods, and coordination of individuals and resources.
- Sales and Marketing—Knowledge of principles and methods for showing, promoting, and selling products or services. This includes marketing strategy and tactics, product demonstration, sales techniques, and sales control systems.
- Economics and Accounting—Knowledge of economic and accounting principles and practices, the financial markets, banking, and the analysis and reporting of financial data.

Prime Skills:

- Writing—Communicating effectively in writing as appropriate for the needs of the audience.
- Complex Problem Solving—Identifying complex problems and reviewing related information to develop and evaluate options and implement solutions.
- Critical Thinking—Using logic and reasoning to identify the strengths and weaknesses of alternative solutions, conclusions, or approaches to problems.
- Speaking—Talking to others to convey information effectively.
- Management of Financial Resources—Determining how money will be spent to get the work done, and accounting for these expenditures.

Prime Abilities:

- Oral Expression—The ability to communicate information and ideas in speaking so others will understand.
- Information Ordering—The ability to arrange things or actions in a certain order or pattern according to a specific rule or set of rules (e.g., patterns of numbers, letters, words, pictures, mathematical operations).
- Written Expression—The ability to communicate information and ideas in writing so others will understand.
- Deductive Reasoning—The ability to apply general rules to specific problems to produce answers that make sense.
- Inductive Reasoning—The ability to combine pieces of information to form general rules or conclusions (includes finding a relationship among seemingly unrelated events).

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'.

i. Employment and Unemployment

Texas Total Nonagricultural Employment grew at a 12.6 percent rate from October 2012 to October 2017. This represented a substantially faster growth rate than that of the entire United States, which expanded at a 9.1 percent rate over the same time frame. Leisure and Hospitality and Educational Services led all other major industries in Texas, with 22.2 and 22.0 percent growth respectively each over the five-year period. Texas Mining and Logging employment declined by 9.5 percent, primarily the result of declining oil prices, although that industry has shown monthly growth over the last 18 months. Information was the only other major industry in Texas to contract over the five-year period. Private Sector employment expanded at a 13.5 percent rate, nearly doubling the rate of Government employment growth, which expanded by 7.7 percent over five years. Industry Employment, 2012-2017

Industry	October 2012	October 2017	Change	% Change
Total Nonagricultural	11,009,600	12,394,900	1,385,300	12.6%
Total Private	9,180,100	10,423,900	1,243,800	13.5%
Goods Producing	1,746,900	1,847,900	101,000	5.8%
Service Providing	9,262,700	10,547,000	1,284,300	13.9%
Mining and Logging	277,000	250,700	-26,300	-9.5%

Industry	October 2012	October 2017	Change	% Change
Construction	594,900	720,400	125,500	21.1%
Manufacturing	875,000	876,800	1,800	0.2%
Retail Trade	1,192,600	1,321,300	128,700	10.8%
Transportation, Warehousing, and Utilities	454,200	543,800	89,600	19.7%
Information	197,700	189,900	-7,800	-3.9%
Financial Activities	668,600	765,200	96,600	14.4%
Professional and Business Services	1,432,100	1,685,900	253,800	17.7%
Educational Services	169,000	206,100	37,100	22.0%
Leisure and Hospitality	1,101,200	1,345,600	244,400	22.2%
Other Services	390,400	448,400	58,000	14.9%
Government	1,829,500	1,971,000	141,500	7.7%

Data Source: Current Employment Statistics

The Retail Trade and Mining and Logging industries each comprise a larger share of Texas employment than they do at the national level. Combined, the two industries account for 12.7 percent of Texas employment, while accounting for 4.5 percent of all jobs at the national level. Texas has a significantly lower share of Education and Health Services jobs compared to the United States (13.6 percent vs. 15.8 percent). Construction, Manufacturing, and Information represent the only industries that are growing faster at a national level than in Texas. While Mining and Logging employment has declined at both the state and national levels, the industry has contracted at a slower rate in Texas than across the entire United States.

Comparing Texas to US Industry Percent Share and Growth Rates, 2012-2017 (October)

Industry	*Texas % Share*	*US % Share*	*Texas Growth Rate*	*US Growth Rate*
Total Nonagricultural	100.0%	100.0%	12.6%	9.1%
Total Private	84.1%	84.8%	13.5%	10.5%
Goods Producing	14.9%	13.7%	5.8%	9.0%
Service Providing	85.1%	86.3%	13.9%	9.2%

Industry	*Texas % Share*	*US % Share*	*Texas Growth Rate*	*US Growth Rate*
Mining and Logging	2.0%	0.5%	-9.5%	-14.3%
Construction	5.8%	4.7%	21.1%	22.1%
Manufacturing	7.1%	8.5%	0.2%	4.3%
Wholesale Trade	4.8%	4.0%	10.4%	4.4%
Retail Trade	10.7%	10.8%	10.8%	6.4%
Transportation, Warehousing, and Utilities	4.4%	3.9%	19.7%	13.4%
Information	1.5%	1.8%	-3.9%	1.8%
Financial Activities	6.2%	5.8%	14.4%	8.6%
Professional and Business Services	13.6%	14.2%	17.7%	15.4%
Educational & Health Services	13.6%	15.8%	15.3%	11.4%
Leisure and Hospitality	10.9%	10.9%	22.2%	15.1%
Other Services	3.6%	3.9%	14.9%	6.2%
Government	15.9%	15.2%	7.7%	2.1%

Data Source: Current Employment Statistics

Since peaking during the great recession in late 2009 (at 8.4 percent), the unemployment rate for Texas has dropped considerably. Texas, for a variety of economic and demographic reasons, weathered the worst of the recession better than most other states. More recently, the unemployment rate in October 2017 stood at 3.9 percent, the lowest unemployment rate in the history of the series that began in 1976. This was slightly lower than the unemployment rate of 4.0% for the United States. The labor force participation rate (LFPR) is the percentage of the total civilian population that is either employed or unemployed but seeking work (that is, either working or actively seeking work). In October 2017, 62.9 percent of Texas' civilian noninstitutional population participated in the labor force. The United States had a slightly lower—62.7 percent—participation rate during the same period. As can be seen in the following Labor Force Participation Rate chart, participation rates have been declining over time for both Texas and the United States. This decline can be attributed to a variety of factors, including an aging population, an increase in disability, and an increase in young people who are delaying work to pursue higher education.

Data Source: Local Area Unemployment Statistics

ii. Labor Market Trends

The Texas industrial composition has significantly changed over time. Cotton, cattle, and petroleum, all dependent on land resources-dominated Texas economic development until the 1950s. Since then, Manufacturing, Retail, Wholesale, Financial Services, and Construction grew rapidly mirroring and serving the urbanization process. Despite the diversification of the state's economy, Texas remained heavily dependent on oil and gas and any fluctuations in oil prices had a major impact on the state, particularly in the 1970s and 1980s. Since the mid-1980s, the state's economy diversified considerably, making the Texas economy more resilient. The developments in the Barnett and Eagle Ford shale areas as well as the high oil prices from 2007 to 2009 insulated Texas from the full force of the economic downturn. Texas' industry composition continued changing away from the largest employers being Manufacturing and Retail toward Health Care. The dominant industry in Texas is now Health Care and Social Assistance because of the need created by a growing and aging population. As of 2017, oil and gas continue to dominate the Permian Basin area. Food manufacturing and petrochemical manufacturing continue to dominate the Panhandle and Southeast Texas, respectively. Retail dominates North Central Texas and Rural Capital, each of which surround large metro areas. Because of Texas A&M University, Education Services continues to dominate Brazos Valley. Finally, Capital Area saw a recent change to Professional and Technical Services being the dominant industry since the area has been attracting more and more tech companies over the last few years. Over the past year, Texas added jobs in 10 of the 11 major industries, including Mining and Logging; Construction; Manufacturing; Trade, Transportation, and Utilities; Financial Activities; Professional and Business Services; Education and Health Services; Leisure and Hospitality; Other Services; and Government. Total Nonfarm job growth has expanded in Texas year-over-year for 90 consecutive months ending October 2017.

TEXAS NONAGRICULTURAL WAGE AND SALARY EMPLOYMENT SEASONALLY ADJUSTED

Industry Title	Oct 2017*	Sep-17	Oct-16	Sep '17 to Oct '17 Absolute Change	Sep '17 to Oct '17 Percent Change	Oct '16 to Oct '17 Absolute Change	Oct '16 to Oct '17 Percent Change
Total Nonagricultural	12,394,900	12,323,400	12,078,800	71,500	0.6	316,100	2.6
Total Private	10,423,900	10,359,800	10,144,600	64,100	0.6	279,300	2.8
Goods Producing	1,847,900	1,841,100	1,758,500	6,800	0.4	89,400	5.1
Mining and Logging	250,700	247,500	214,300	3,200	1.3	36,400	17.0
Construction	720,400	715,900	703,200	4,500	0.6	17,200	2.4
Manufacturing	876,800	877,700	841,000	-900	-0.1	35,800	4.3
Service Providing	10,547,000	10,482,300	10,320,300	64,700	0.6	226,700	2.2

Industry Title	Oct 2017*	Sep-17	Oct-16	Sep '17 to Oct '17 Absolute Change	Sep '17 to Oct '17 Percent Change	Oct '16 to Oct '17 Absolute Change	Oct '16 to Oct '17 Percent Change
Trade, Transportation and Utilities	2,458,500	2,448,200	2,428,500	10,300	0.4	30,000	1.2
Information	189,900	191,200	200,600	-1,300	-0.7	-10,700	-5.3
Financial Activities	765,200	762,200	783,300	3,000	0.4	26,900	3.6
Professional and Business Services	1,685,900	1,679,600	1,635,900	6,300	0.4	50,000	3.1
Education and Health	1,682,500	1,680,500	1,649,000	2,000	0.1	33,500	2.0
Leisure and Hospitality	1,345,600	1,310,900	1,304,600	34,700	2.6	41,000	3.1
Other Services	448,400	446,100	429,200	2,300	0.5	19,200	4.5
Government	1,971,000	1,963,600	1,934,200	7,400	0.4	36,800	1.9

Data Source: Current Employment Statistics

The Texas annual growth rate surpassed that of the United States after a brief 14-month period starting in October 2015, in which the US annual growth rate was greater. For October 2017, the Texas annual growth rate stood 1.2 percentage points higher than that of the United States at 1.4 percent.

As of October 2017, the seasonally adjusted unemployment rate for Texas stood at 3.9 percent, and represents a series-history low for the state dating back to 1976. This rate was 0.2 percentage points lower than the rate of 4.1 percent for the United States. The unemployment rate for Texas has been lower than that of the United States in 119 out of the previous 130 months.

Data Source: Local Area Unemployment Statistics

As Texas employment continues to rise, so do average weekly wages. According to the Quarterly Census of Employment and Wages, average weekly wages for the second quarter of 2017, the most recent quarter available, have increased by 8.7 percent over five years ending 2017. As tracked by the Current Employment Statistics program, hourly earnings of production workers have increased annually in 11 categories, with the highest increase occurring for Telecommunications workers, with a 26.8 percent increase in wages, over the 12-month period.

iii. Education and Skill Levels of the Workforce

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

- Based on Census Bureau data from 2012 to 2016, 82.3 percent of Texans aged 25 years and older had attained an educational level of high school graduate or higher, compared to 87.0 percent nationwide. The percentage of Texans who had attained a bachelor's degree or higher stood at 28.1 percent, compared to 30.3 percent for the nation.
- Based on Census Bureau data from 2012 to 2016, 7.2 percent of Texans under the age of 65 years old were classified as having a disability, a figure that was slightly lower than the rate of 7.4 percent for the United States.
- Based on Census Bureau data from 2012 to 2016, only 6.1 percent of veterans over the age of 24 in Texas had attained less than a high school degree, compared to 17.7 percent of the same age cohort in the state as a whole. Similarly, 70.4 percent of Texas' veterans over the age of 24 had attained at least some college, as compared to 57.2 percent of Texans of that age group as a whole.

See the tables below for additional information on key Texas population characteristics, including education attainment for the general population and for veterans.

Key Texas Population Characteristics:

- In 2016, the Census Bureau estimated the population of Texas to be 26,956,435.
- As of May 2016, the Bureau of Labor Statistics estimated the Texas civilian labor force at 13,520,071 persons, second only to California among US states.
- As of May 2016, Texas' unemployment rate of 4.8 percent stood 0.5 percentage points higher than the unemployment rate for the United States, 4.3 percent.
- Texas' labor force, because of its size and diversity, is expected to mirror national trends, which project a decrease in the labor force of individuals ages 16 to 24 and 25 to 54, and an increase in ages 55 and older.
- Nationally, the labor force is projected to increase 6.8 percent by 2020, but the labor force workers ages 55 and older is projected to increase 38 percent.

Texas Population 18 to 24 years	%
Less than high school graduate	16.3%
High school graduate (includes equivalency)	31.2%
Some college or associate's degree	44.3%
Bachelor's degree or higher	8.1%
Texas Population 25 years and older	%
Less than 9th grade	8.9%

Texas Population 25 years and older	%
9th to 12th grade, no diploma	8.8%
High school graduate (includes equivalency)	25.1%
Some college, no degree	22.4%
Associate's degree	6.8%
Bachelor's degree	18.5%
Graduate or professional degree	9.6%
Texas Veterans 25 years and older	%
Less than high school graduate	6.1%
High school graduate (includes equivalency)	23.5%
Some college or associate's degree	40.8%
Bachelor's degree or higher	29.6%

Based on Census Bureau data from 2016, there were an estimated 644,181Texans between the ages of 18 and 64 at work with some kind of disability, or 5.3 percent of all employed Texans of that age. The estimated number of unemployed Texans with disabilities over this period was 85,045 individuals, which represented 12 percent of the total number of unemployed in Texas. Finally, the Census Bureau estimate from this period indicated that 23.3 percent of Texans ages 18 to 64 years old who were not in the labor force had some type of disability, an estimated 924,636 individuals.

	Estimate
Number of Texans, 18-64 years old	16,843,883
In the labor force:	12,876,798
Total Employed:	12,170,733
Employed with a disability	644,181
Employed with a hearing difficulty	180,127
Employed with a vision difficulty	165,951
Employed with a cognitive difficulty	184,980

	Estimate
Employed with an ambulatory difficulty	223,871
Employed with a self-care difficulty	46,206
Employed with an independent living difficulty	97,168
Employed with no disability	11,526,552
Total Unemployed:	706,065
Unemployed with a disability	85,045
Unemployed with a hearing difficulty	16,548
Unemployed with a vision difficulty	19,845
Unemployed with a cognitive difficulty	42,613
Unemployed with an ambulatory difficulty	28,295
Unemployed with a self-care difficulty	8,371
Unemployed with an independent living difficulty	22,717
Unemployed with No disability	621,020
Total Not in Labor Force:	3,967,085
Not in labor force, with a disability	924,636
Not in labor force, with a hearing difficulty	151,446
Not in labor force, with a vision difficulty	190,135
Not in labor force, with a cognitive difficulty	429,846
Not in labor force, with an ambulatory difficulty	541,044
Not in labor force, with a self-care difficulty	238,348
Not in labor force, with an independent living difficulty	430,521
Not in labor force, with no disability	3,042,449

iv. Skills Gaps

Describe apparent "skills gaps."

TWC does not have sufficient data to adequately address skills gaps for specific occupations at the state or regional level. However, anecdotal information suggests that the state is facing a shortage of skilled workers in occupations requiring postsecondary training. This includes trade occupations, such as carpenters, plumbers, welders, and electricians, as well as professional occupations such as doctors, accountants, and information technology professionals. Employers have reported difficulties hiring sufficient numbers of trained workers in advanced manufacturing occupations. The Federal Reserve Bank of Dallas has stated, "It is becoming more common that businesses in key industries in Texas are unable to find enough sufficiently trained workers to fill

available, middle-skill jobs." Further, Texas CEO magazine noted that "During the past decade, the number of mathematics and statistics degrees awarded in Texas rose less than 15 percent. During this period, the number of computer and math jobs in Texas increased nearly 45 percent. The result is full employment for computer and math talent." As noted earlier, anecdotal information suggests a growing need for additional highly skilled workers with specialized postsecondary training.

2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

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

A. THE STATE'S WORKFORCE DEVELOPMENT ACTIVITIES

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

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

Hurricane Harvey struck the Texas Gulf Coast on August 25, 2017. Storm surge, widespread catastrophic flooding, and destructive winds devastated coastal communities, the city of Houston, and surrounding areas in southeastern Texas.

The Federal Emergency Management Agency (FEMA), through Disaster Declaration 4332 and associated amendments, declared 50 Texas counties federal disaster areas. FEMA approved eight workforce areas to receive federal public and individual assistance. FEMA approved nine additional counties in seven workforce areas that sustained little or no storm damage to receive federal public assistance to help manage the influx of hurricane evacuees.

Federal, state, and local governments moved quickly to implement programs and policies that address the workforce system needs of the affected communities.

DOL granted the State of Texas $30 million in National Dislocated Worker Grant (NDWG) funds. DOL's quick response to the state's needs has allowed an unprecedented speed in the delivery of workforce services. These services include the creation of temporary employment to assist with the immediate needs of cleanup and recovery as well as addressing the long-term needs of individuals displaced from previous employment to retrain and upskill the labor force.

The temporary workers hired through the NDWG are helping affected communities repair public areas in a timely manner, which those communities would not be able to do with their normal operating budgets. It also provides humanitarian assistance through nonprofits to provide relief to individuals in need.

Training provided by the grant funds will focus on the shortage of skilled labor in the construction industry, specifically in residential construction. This has been identified as the most critical area of need from a workforce training perspective in the short and long term. Many innovative and accelerated short-term training courses already exist and can be easily replicated and deployed to areas hardest hit by the disaster. The courses complement longer-term training programs already in place, allowing individuals to become employed quickly and to continue to work while gaining valuable training both on the work-site and in the classroom, to prepare for longer-term recovery jobs.

Training for long-term recovery has been identified as a critical need. In response, Governor Abbott charged the Tri-Agency Workforce Partners, which include TWC, the Texas Education Agency (TEA), and the Texas Higher Education Coordinating Board (THECB), with developing an education and workforce training plan to support rebuilding communities affected by Hurricane Harvey and to help Texans get back to work. Some of the strategies that have been identified include the following:

- Engaging employers and trade associations to help identify specific jobs that are available, the type of training that is required for those positions, and the right number of individuals to be trained for the appropriate occupations.
- Promoting collaboration among groups within the building industry, such as Texas Association of Builders, North American Building Trades, and Associated Builders and Contractors to address workforce needs by developing and providing expedited training for individuals who will work in the cleanup and rebuild effort.
- Implementing the Upskill and Rebuild Initiative to provide recovery training grants that deliver immediate short-term training to equip dislocated workers with skills to support hurricane recovery efforts in construction initially, and other industry sectors, to accelerate employing individuals and rebuilding communities.
- Developing partnerships with training providers, apprenticeship programs, employer groups, trade associations, and other stakeholders to continually develop training programs that align with demand across industries and market conditions.
- Developing career pathway models that support students obtaining stackable credentials leading to fast-growing, high-demand occupations across industry sectors.
- Providing administrative flexibility and work with adult education and literacy providers to identify opportunities to develop short-term, fast-track Integrated Education and Training (IET) models to eligible individuals, focusing on the construction industry, and to examine opportunities to engage with preapprenticeship and apprenticeship training programs. Deploying these strategies quickly connect these students with employers.
- Maintaining a focus on small and rural communities and developing training programs in partnership with Local Workforce Development Boards (Boards), community colleges, and industry to ensure that displaced workers can obtain skills to quickly enter demand occupations.

Additional program and policy guidance for these grants has been captured in the Hurricane Harvey guide at http://www.twc.state.tx.us/files/partners/hurricane-harvey-operational-program-guidance-twc.pdf. Included in the operational guidance are specific questions and responses related to the implementation of these grants to support Boards' rapid implementation.

TWC also requested that the DOL Employment and Training Administration (DOL-ETA) waive certain WIOA requirements to allow the flexibility needed to provide workforce areas with resources to help workers, job seekers, employers, and youth recover from one of the costliest natural disasters in US history. A summary of the approved waivers is included in this plan under part 1 of Section C, State Strategy.

For the Texas economy to grow and prosper, employers must convey to job seekers the skills their businesses need. Conversely, job seekers must recognize and promote the skills they possess, or obtain new or upgraded skills to meet businesses' needs. The state's market-driven workforce development system plays a vital role in this process, acting as a hub for sharing information related to jobs and skills, facilitating connections between businesses and job seekers, and providing assistance with job search and training needs. Boards and their contractors work collaboratively to ensure that these services and assistance are available to all employers and job seekers, including veterans, individuals with disabilities, older adults, and others.

Job growth, sales tax collections, and building permits all signal that the Texas economy continues to outpace the national economy. Over the past year, Texas added jobs in 9 of the 11 major industries.

The opportunities that come with a growing economy and expanding workforce are many and varied. TWC and its workforce development partners will continue to collaborate with community and industry partners to expand these opportunities and find new ways to achieve positive results. The development of innovative workforce services to meet the needs of employers and workers is vital to the success of the workforce system.

As businesses expand their operations and new employers emerge during this period of rapid technology advances, there is a growing opportunity to assist with workforce skills development and training. The gap between in-demand skills and available labor force skills must be addressed at all levels. This includes the availability of technical training opportunities as well as efforts to increase the number of skilled craft specialists. Increased development of regional collaborations with employers, Boards, community colleges, and other training providers will be engaged to address this opportunity.

TWC uses long-term projections data to identify industries likely to grow the fastest. Growth assumes, in part, an adequate supply of workers with relevant skills. The Bureau of Labor Statistics (BLS), however, foresees that a combination of slower growth of the civilian non-institutional population and falling participation rates of youths and prime age workers will lower national labor force growth to some 0.5 percent annually. In Texas, growth is buoyed by improving programs for individuals with barriers to employment by identifying transferable skills valued by employers, as well as providing education and training to upscale their skills in high-growth sectors.

The following statewide goals and benchmarks issued by the Office of the Governor are related to the state's workforce development, education, and training activities:

Education—Public Schools*Priority Goal*

To ensure that all students in the public education system acquire the knowledge and skills to be responsible and independent Texans by:

- ensuring students graduate from high school and have the skills necessary to pursue any option including attending a university, a two-year institution, or other postsecondary training; serving in the military; or entering the workforce;
- ensuring students learn English, math, science, and social studies skills at the appropriate grade level through graduation; and
- demonstrating exemplary performance in foundation subjects.

Benchmarks

- Percentage of recent high school graduates enrolled at a Texas college or university
- Number of prekindergarten-age students served through the Texas Early Education Model

Education—Higher Education*Priority Goal*

To prepare individuals for a changing economy and workforce by:

- providing an affordable, accessible, and quality system of higher education; and
- furthering the development and application of knowledge through teaching, research, and commercialization.

Benchmarks

Percentage of nursing graduates employed or enrolled in nursing graduate programs in Texas

Health and Human Services*Priority Goal*

To promote the health, responsibility, and self-sufficiency of individuals and families by making public assistance available to those most in need through an efficient and effective system while reducing fraud.

Benchmarks

- Percentage of Texans receiving TANF cash assistance
- Percentage of adult welfare participants in job training who enter employment

Economic Development*Priority Goal*

To provide an attractive economic climate for current and emerging industries and market Texas as a premier business expansion and tourist destination that fosters economic opportunity, job creation, and capital investment by:

- promoting a favorable business climate and a fair system to fund necessary state services;
- addressing transportation needs;
- maintaining economic competitiveness as a key priority in setting state policy; and
- developing a well-trained, educated, and productive workforce.

Benchmarks

- Number of employees in targeted industry sectors
- Number of new small businesses created
- Number of new nongovernment, nonfarm jobs created
- Texas unemployment rate
- Number of Texans receiving job-training services

General Government

Priority Goal

To provide citizens with greater access to government services while reducing service delivery costs and protecting the fiscal resources for current and future taxpayers by:

- supporting effective, efficient, and accountable state government operations;
- ensuring the state's bonds attain the highest possible bond rating; and
- conservatively managing the state's debt.

Benchmarks

- Ratio of federal dollars received to federal tax dollars paid
- Number of state employees per 10,000 population
- Number of state services accessible by Internet Total savings realized in state spending by making reports/documents/processes available on the Internet and accepting information in electronic format

Core Program Activities to Implement the State's Strategy

The following activities support WIOA core programs and align with the state's strategies, as previously described.

TWC administrates the development and integration of workforce services in tandem with the Board's oversight and planning efforts. Service delivery is executed through Texas Workforce Solutions, which may contract with one-stop providers to operate a variety of program components. This network gives customers local access to workforce solutions and statewide services at approximately 200 Workforce Solutions Offices, four UI Tele-Centers, and numerous partner locations.

WIOA has reinforced Texas' progress toward integrating services for customers. WIOA §193(a)(3) provides that Boards' contracted workforce service providers and community partners are defined under prior consistent state law.

Sections 302.021 and 302.062 of the Texas Labor Code set forth the job training, employment, and employment-related educational programs and functions consolidated under the authority of TWC. In Texas, prior consistent state law defines the Boards' responsibility to develop, implement, and modify a plan for convening all relevant programs, identified as one-stop required-partner programs, including:

- Workforce Innovation and Opportunity Act (WIOA, formerly Workforce Investment Act (WIA))
- Wagner-Peyser Employment Service (ES)

- Unemployment Insurance (UI) Benefits Information
- Choices, the Temporary Assistance for Needy Families (TANF) employment and training program
- Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)
- Subsidized child care
- Trade Adjustment Assistance (TAA)
- Adult Education and Literacy (AEL) programs

The 84th Texas Legislature, Regular Session (2015), amended the Texas Labor Code by adding Title 4, Subtitle 4, which transfers the following programs from DARS to TWC on September 1, 2016:

- VR (WIOA, Title IV) programs
- Business Enterprises of Texas
- Grant for Independent Living Services for Older Individuals Who are Blind
- The Criss Cole Rehabilitation Center

Prior consistent state law further defines the following as required one-stop partner programs. Other than UI compensation, which is administered by TWC, the programs are not under the direct oversight of the Boards; therefore, Boards are required to establish memoranda of understanding (MOUs) with:

- Adult Education and Literacy (WIOA, Title II);
- Apprenticeship programs;
- National and Community Services Act Program;
- Non-Certificate Postsecondary Career and Technology Training programs; and
- Senior Community Service Employment Program.

TWC also recommends that Boards enter into MOUs with the following optional partner activities:

- Career and technical education programs authorized under the Carl D. Perkins Act of 2006
- Job counseling, training, and placement services for veterans, 38 USC 41
- Education and vocational training program through Job Corps administered by DOL
- Native American programs authorized under Title I of WIOA
- HUB-administered employment and training programs
- Employment and training activities carried out under the Community Services Block Grant Act
- Reintegration of offenders programs authorized under the Second Chance Act, 2007
- Migrant and Seasonal Farmworker programs authorized under Title I of WIOA

Additionally, Boards are encouraged to continually expand and enhance their network by forming partnerships outside of the Workforce Solutions Offices. Some agencies and services with which Boards establish additional cooperative relationships include the following:

- Local boards of education
- Local-level vocational education agencies
- Community-based Organizations (CBOs)
- Faith-based Organizations (FBOs)

- Texas Department of Housing and Community Affairs (TDHCA)
- Other appropriate training and employment agencies and services to expand local presence

TWC also requires Boards to jointly develop and adopt an MOU with HHSC. Although HHSC is a federal optional one-stop partner, the MOU fulfills state law regarding the coordinated interagency case management of recipients of financial assistance in employment and training activities and support services (Texas Human Resources Code §31.0128), and reflects Texas state law mandating their integration within TWC.

Pay-for-Performance Contract Strategy

TWC and Boards will maintain, where applicable, performance-based contracts. As in the past, however, TWC and Boards will consider developing, with stakeholder input, a WIOA pay-for-performance contracting strategy applicable to Title I programs, as defined in WIOA §3(47).

The development of a performance-based contract is contingent on the pay-for-performance contract strategy, which establishes specific benchmarks that must be achieved in order for the contractor to receive payment. WIOA calls for the benchmarks to be tied to the prime indicators of performance and adjustments thereof related to economic conditions and the population demographics.

TWC intends for pay-for-performance contract strategies to be implemented in accordance with further guidance regarding WIOA performance requirements. Additionally, DOL's guidance is sought for both state and local areas in developing the broader pay-for-performance contract strategy, including the scope and minimum requirements of the required feasibility study, as presented in the Notice of Proposed Rule Making (NPRM) (document no. 2015-05530).

TWC will continue to allow Boards to use performance-based contracts that are not WIOA pay-for-performance contracts. Furthermore, TWC will maintain the latitude provided for in WIOA to consider the development of a pay-for-performance contract strategy as guidance is issued.

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 strengths of operating an integrated workforce development system are significant. Texas' implementation of WIOA's six core programs supports a service delivery system that meets the needs of employers, and then works to ensure that relevant training and employment assistance is available for job seekers, including those with disabilities—regardless of the funding source.

However, the potential for funding reductions—particularly for programs with specific eligibility and use criteria—are likely to challenge the system. Boards work individually, together, and with other stakeholders to achieve cost efficiencies and a seamless service delivery system. Models exist that, if replicated or expanded, could significantly enhance participant access to a range of workforce and associated support services. Collaborative efforts aid in providing an adequate supply of workers that meet the skills requirements of available jobs, thus assisting the state's employers with retaining and enhancing a competitive economic advantage.

C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

TWC has emerged as a national leader in workforce development activities by fostering a locally determined workforce system—fundamental to putting Texans back to work and spurring the state's economic competitiveness. Texas is experiencing growth in new jobs and the labor market overall, and the need to strategically strengthen the workforce development system championed by TWC remains clear.

TWC aligns workforce development activities by establishing rigorous strategic planning requirements coupled with common performance accountability measures, and requirements governing Texas' one-stop delivery system. TWC coordinates and collaborates with the 28 Boards and their contracted workforce service providers and community partners. Collectively known as Texas Workforce Solutions, this network offers local access to integrated and statewide services to all employers, workers, and job seekers and youth, including individuals with disabilities and other barriers to employment.

Congressional action to reauthorize and reform WIA—now WIOA—allows the Boards to continue to apply and improve upon an integrated strategy for serving the Texas labor market. Texas has implemented a majority of programmatic changes mandated by WIOA, such as providing Temporary Assistance for Needy Families (TANF) participants with training and placement services by ES staff and using common performance measures across core programs for both adults and youth. WIOA clearly recognizes Texas' integrated workforce system by the inclusion of the permissible alternate entity language.

In advance of the Notice of Proposed Rulemaking to implement WIOA, TWC established several WIOA implementation workgroups in late 2014. The workgroups, made up of state and local staff and other interested parties, have sought to address strategic areas of implementation, such as fiscal challenges, performance measures, regional identification, and service delivery.

Recognizing that innovative, progressive services promote a stronger Texas, the Texas Workforce Solutions network has continued its strategy of providing value-added services, which improve customers' opportunities for growth.

Meeting the Needs

TWC is aware of the state's changing demographics and skills gaps, and continues to design programs to meet increasingly complex workforce needs. Through the Texas Workforce Solutions network, TWC connects job seekers and other populations with barriers to employment to numerous career and training resources to prepare them to enter or reenter the workforce of high-growth industry sectors. Although the service is targeted, its delivery is uniformly applied.

Leveraging an integrated workforce system, TWC also strives to create a seamless approach that attracts and retains in-demand employers. The agency understands that an employer may not care which funding source or program is covering the service it is receiving. By creating specific Business Service Units (BSUs) at each Board, the workforce system rallies a group of dedicated individuals to meet employer needs and present employers with services in ways that are beneficial and easy to understand. BSUs are Boards' frontline business advocates, often having strong ties to the local business communities. Furthermore, because Boards are predominantly composed of local business leaders, TWC taps a continuous flow of current and relevant information from employers. Board members are able to shape local policies and procedures to best fit the local marketplace.

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.

Mission

TWC's mission is to promote and support a workforce system that creates value and offers employers, individuals, and communities the opportunity to achieve and sustain economic prosperity.

Vision

TWC and its Texas Workforce Solutions partners will maximize the power of innovation and partnerships to boost superior business outcomes and realize a competitive advantage for all Texans in the global economy.

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—

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

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

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

TWC's vision is rooted in four strategic goals that take into account the state's economic conditions, workforce, and workforce development activities. The following four goals are

intended to address critical populations, including claimants, youth, individuals with barriers to employment, veterans, and individuals with disabilities.

1. Foster a dynamic, integrated, and market-driven workforce development system that gives employers and individuals ready access to a network of high-quality information and services.
2. Provide Texans access to literacy, education, vocational rehabilitation, and in-demand workplace skills necessary for self-sufficient employment and advancement.
3. Empower the current and future Texas workforce with the career information, knowledge, and skills necessary for employment and career advancement in high-skilled, high-wage careers.
4. Safeguard and maintain public trust in the Texas workforce system through sound fiscal stewardship, strong performance and accountability measures, and achievement of system-wide performance outcomes.

The Texas workforce development system's market-driven approach incorporates all potential customers, including employers and job seekers, as well as workforce service providers, economic development entities, universities, community colleges, and training providers. This approach ensures that all workforce system customers are valued, informed contributors to and drivers of the system, thus allowing state and local policymakers to strategically plan for the current and future needs of the state.

Texas Workforce Solutions continuously monitors and analyzes the needs of the state's workforce and businesses to ensure a solid approach that enables job growth, promotes a well-trained workforce, and ensures Texas' ability to compete on a global level.

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.)

Table 1. Employment (Second Quarter after Exit)

Program	PY 2018 Proposed/ Expected Level	PY 2018 Negotiated/ Adjusted Level	PY 2019 Proposed/ Expected Level	PY 2019 Negotiated/ Adjusted Level
Adults	76.10%	76.10%	76.30%	76.10%
Dislocated Workers	81.10%	81.10%	81.30%	81.10%
Youth	71.90%	71.90%	72.10%	71.90%

Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	69.00%	69.00%	69.20%	69.00%
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

Table 2. Employment (Fourth Quarter after Exit)

Program	PY 2018 Proposed/ Expected Level	PY 2018 Negotiated/ Adjusted Level	PY 2019 Proposed/ Expected Level	PY 2019 Negotiated/ Adjusted Level
Adults	73.10%	73.10%	73.30%	73.10%
Dislocated Workers	80.10%	80.10%	80.30%	80.10%
Youth	73.90%	73.90%	74.10%	73.90%
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	69.00%	69.00%	69.20%	69.00%
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

Table 3. Median Earnings (Second Quarter after Exit)

Program	PY 2018 Proposed/ Expected Level	PY 2018 Negotiated/ Adjusted Level	PY 2019 Proposed/ Expected Level	PY 2019 Negotiated/ Adjusted Level
Adults	$4,800	$4,800	$4,900	$4,800
Dislocated Workers	$7,300	$7,300	$7,400	$7,300
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	$5,200	$5,200	$5,300	$5,200
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

Table 4. Credential Attainment Rate

Program	PY 2018 Proposed/ Expected Level	PY 2018 Negotiated/ Adjusted Level	PY 2019 Proposed/ Expected Level	PY 2019 Negotiated/ Adjusted Level
Adults	65.00%	65.00%	65.20%	65.00%
Dislocated Workers	74.00%	74.00%	74.20%	74.00%
Youth	61.40%	61.40%	61.60%	61.40%
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

Table 5. Measurable Skill Gains

Program	PY 2018 Proposed/ Expected Level	PY 2018 Negotiated/ Adjusted Level	PY 2019 Proposed/ Expected Level	PY 2019 Negotiated/ Adjusted Level
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	52%	52%	53%	53%
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

Table 6. Effectiveness in Serving Employers

Program	PY 2018 Proposed/ Expected Level	PY 2018 Negotiated/ Adjusted Level	PY 2019 Proposed/ Expected Level	PY 2019 Negotiated/ Adjusted Level

Program	PY 2018 Proposed/ Expected Level	PY 2018 Negotiated/ Adjusted Level	PY 2019 Proposed/ Expected Level	PY 2019 Negotiated/ Adjusted Level
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	Baseline	Baseline	Baseline	Baseline
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

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.

Texas Government Code §2308.101 requires the state board, the Texas Workforce Investment Council (TWIC), to monitor the state's workforce investment system. As part of that responsibility, TWIC annually reports to the governor and the legislature on the degree to which the system is achieving state and local workforce goals and objectives. In January 2016, TWIC released the Texas Workforce System Strategic Plan for Fiscal Years 2016-2023, available at http://gov.texas.gov/twic/workforce_system.

State statutes require that TWIC evaluate six elements in the workforce system:

- Workforce agency program performance and alignment
- Formal and Less Formal performance measures
- Implementation of the system strategic plan
- Adult education actions and achievements
- Board activities and alignment
- Work development programs that focus on welfare-to-work initiatives

A primary focus of TWIC in Fiscal Year 2016 will be the first year of implementation of the new workforce system strategic plan and the development of a balanced scorecard approach to system evaluation. Work will continue on studies and reports to support the implementation of the system strategic plan and to design and launch system projects to strengthen the three strategic pillars that form the foundation of the strategic plan: customer services and satisfaction, data-driven program improvement, and continuous improvement and innovation.

Additionally, TWIC will evaluate programs to identify any gaps or duplications in planning or service delivery, and any other programs that adversely affect the seamless delivery of services. Any problems identified by TWIC will be included in the annual report on strategic plan implementation and the results of measures taken by TWIC to address those problems.

Program and other data from across the workforce system are critical in evaluating the extent to which workforce system programs, services, and products are meeting the needs of customers and stakeholders. The collection of key data, as well as the reporting and analysis of that data—in a consistent and useful manner—are essential in demonstrating outcomes, determining if changes are required or desired, and establishing benchmarks for future performance.

Under the new system strategic plan, TWIC will continue to work with system partners to build upon process improvements in an effort to fully systematize these processes. TWIC will review and update the definitions and methodologies. The system evaluation structure will be redesigned, yet will continue to address all elements required by statute.

C. STATE STRATEGY

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

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

Overview

TWC will continue implementation of its initial strategies. WIOA is still a very new program. Meaningful data should be available once TWC has had these strategies in place for a full plan period. Texas has experienced job growth in just the first full year of the plan period. (Texas added jobs in 10 of the 11 major industries, up from 9 of the 11 since the beginning of the plan year.) For this reason, no significant changes are planned that would impact TWC's strategies for the next two years.

The state's workforce system is complex, comprising numerous programs, services, and initiatives administered by state agencies and Boards, TWIC, independent school districts, community and technical colleges, and local adult education providers. System partners are responsible for the delivery of a wide range of workforce education and training programs and related services, as well as education programs that support career preparation and advancement.

The system is interrelated because the programs and agencies serve either a common customer or are charged with achieving similar employment and education outcomes for

their targeted customer groups. Therefore, the strategic planning process is designed to identify and focus on systemic issues that affect multiple parts of the system—either programs or agencies—and that address broad, big-picture workforce issues. TWIC and its system partners completed a year-long planning process, culminating with the development of the new system strategic plan. Because the system strategic plan focuses on issues that span agencies and programs, it fulfills a unique and complementary role in the workforce system and does not duplicate the purpose or scope of other agency or program plans.

Several priority issues were identified that will be addressed by system partners during the strategic plan period. In identifying these issues, TWIC examined both program and participant outcomes that are critical to Texas' workforce and competitiveness, in addition to the critical issues and interdependencies that cross agencies. The most recent update of the plan is available at http://gov.texas.gov/twic/workforce_system.

TWC Strategies

The Texas workforce system has matured significantly since 1995, when the legislature merged staff and programs from 10 different state agencies to create TWC. In 1993, the Texas legislature passed Senate Bill (SB) 642, the Workforce and Economic Competitiveness Act, the purpose of which was to transform the state's fragmented workforce development system into an integrated service-delivery network, thus improving the quality and effectiveness of services.

In 1995, Texas' workforce programs began to consolidate into a single, integrated system known today as Texas Workforce Solutions, coordinating among state and local levels. House Bill (HB) 1863 took effect in September 1995, merging 28 workforce programs across a number of state agencies into a singular agency, TWC.

In July 1999, TWC became the state entity in charge of implementing the federal Workforce Investment Act (WIA) of 1998. WIA provided for a number of "grandfather" provisions, recognizing that Texas previously established the framework of an integrated workforce system. These grandfather provisions allowed Texas to continue certain provisions under prior consistent state law. One of these provisions was specific to the designation of local workforce development areas (workforce areas). This provision allowed Texas' Boards to continue as long as they performed successfully and maintained sustained fiscal integrity.

In July 2014, when WIOA was enacted, Congress again recognized Texas' workforce system, with WIOA maintaining the provisions that allow Texas to continue under prior consistent state law. Absent any new direction from the Texas legislature, Texas will continue to operate under prior consistent state law. The Texas workforce system, therefore, was well positioned to implement WIOA.

TWC has emerged as a national leader in workforce development activities by fostering a locally determined workforce system—fundamental to putting Texans back to work and spurring the state's economic competitiveness. Texas is experiencing growth in new jobs and the labor market overall, and the need to strategically strengthen the workforce development system championed by TWC remains clear.

TWC aligns workforce development activities by establishing rigorous strategic planning requirements coupled with common performance accountability measures, and requirements governing Texas' one-stop delivery system. TWC coordinates and

collaborates with the 28 Boards and their contracted workforce service providers and community partners. Collectively known as Texas Workforce Solutions, this network offers local access to integrated and statewide services to all employers, workers, and job seekers and youth, including individuals with disabilities and other barriers to employment.

Congressional action to reauthorize and reform WIA—now WIOA—allows the Boards to continue to apply and improve upon an integrated strategy for serving the Texas labor market. Texas has implemented a majority of programmatic changes mandated by WIOA, such as providing Temporary Assistance for Needy Families (TANF) participants with training and placement services by ES staff and using common performance measures across core programs for both adults and youth. WIOA clearly recognizes Texas' integrated workforce system by the inclusion of the permissible alternate entity language.

In advance of the Notice of Proposed Rulemaking to implement WIOA, TWC established several WIOA implementation workgroups in late 2014. The workgroups, made up of state and local staff and other interested parties, have sought to address strategic areas of implementation, such as fiscal challenges, performance measures, regional identification, and service delivery.

Recognizing that innovative, progressive services promote a stronger Texas, the Texas Workforce Solutions network has continued its strategy of providing value-added services, which improve customers' opportunities for growth.

Meeting the Needs

TWC is aware of the state's changing demographics and skills gaps, and continues to design programs to meet increasingly complex workforce needs. Through the Texas Workforce Solutions network, TWC connects job seekers and other populations with barriers to employment to numerous career and training resources to prepare them to enter or reenter the workforce of high-growth industry sectors. Although the service is targeted, its delivery is uniformly applied.

Leveraging an integrated workforce system, TWC also strives to create a seamless approach that attracts and retains in-demand employers. The agency understands that an employer may not care which funding source or program is covering the service it is receiving. By creating specific Business Service Units (BSUs) at each Board, the workforce system rallies a group of dedicated individuals to meet employer needs and present employers with services in ways that are beneficial and easy to understand. BSUs are Boards' frontline business advocates, often having strong ties to the local business communities. Furthermore, because Boards are predominantly composed of local business leaders, TWC taps a continuous flow of current and relevant information from employers. Board members are able to shape local policies and procedures to best fit the local marketplace.

Targeted Service Populations

Employers

Texas' strong economic foundation is largely a credit to the diversity and stability of its private-sector businesses. The state boasts an estimated 485,000 total employers representing hundreds of public and private industries. The overwhelming majority of Texas employers are small businesses employing 100 or fewer workers. However, the

largest percentages of private-sector jobs are with those companies that employ more than 100 workers. It is vital that TWC and its workforce partners collaborate with local economic development entities to equip Texas employers, both large and small, with a highly skilled workforce that will keep jobs in Texas and keep companies competitive in the global marketplace.

Communities

Texas Workforce Solutions provides locally customized services that address the needs of each region of the state. The Boards comprise a cross section of local officials and businesspeople that form partnerships with local entities to deliver integrated services that address each community's unique needs. This workforce system now supports the delivery of Adult Education and Literacy (AEL) services within local communities to assist those individuals who need education and training in order to obtain the basic skills that will enable them to obtain sustainable employment and become self-sufficient.

Job Seekers

Providing employment services and developing innovative strategies to help individuals find employment opportunities in high-growth, high-wage industries are central to TWC's mission. TWC and its workforce partners offer services that lead to hundreds of thousands of job seekers entering employment each year. Services include job-search assistance, labor market and career planning information, training and education opportunities, and unemployment benefits to those who lose their jobs through no fault of their own.

Workers

With a workforce of 13 million eligible workers, TWC seeks to help Texans achieve and succeed in a quality work environment. The agency provides workforce development and training, apprenticeship programs, and employment support services for members of its labor force. The agency promotes long-term self-sufficiency by enabling parents to work or attend education and training to launch a career pathway, while their children receive quality child care. TWC also investigates wage claims, child labor law violations, and employment discrimination claims to ensure that workers receive fair treatment and compensation for their work.

Unemployment Insurance Claimants

TWC strongly encourages Boards to design services that provide early intervention with unemployment insurance (UI) claimants. Continued comprehensive services for claimants are promoted throughout the life of their claim cycle. To these ends, Boards dedicate staff to claimants, and to establish claimant protocols that include ongoing one-on-one reemployment services. The longer individuals draw UI, the more likely they are to exhaust their benefits. Therefore, it is incumbent upon Boards to reflect the key points within the UI claim cycle in its service delivery strategies.

Veterans

Veterans are a priority population for TWC. The agency's own workforce is made up of nearly 12 percent veterans, compared to an average of just over 5 percent by all other state agencies. The Texas Veterans Commission recognized TWC's hard work in September 2015 with the Public Entity (Government Agency) Large Employer of the Year award. TWC

promotes the hiring of veterans by others through a number of initiatives, including services and programs for U.S. armed service members returning from Iraq and Afghanistan.

Individuals with Disabilities

Approximately 12 percent of the Texas population is estimated to have some type of disability. TWC is committed to providing services to this population; TWC promotes competitive employment of individuals with disabilities coupled with the expectation that they are able to meet the same employment standards and responsibilities as other working-age adults. All working-age individuals with disabilities, including young adults, are offered factual information regarding employment as an individual with a disability, including the relationship between an individual's earned income and the individual's public benefits.

The VR program—currently housed at DARS, but moving to TWC on September 1, 2016—helps individuals with disabilities prepare for, find, and keep jobs, and helps students with disabilities plan the jump from school to work. Work-related services are individualized and may include counseling, training, medical treatment, assistive devices, job placement assistance, and other services.

TWC additionally promotes partnerships with employers to overcome barriers to meeting workforce needs with the creative use of technology and innovation. TWC takes steps to ensure that the staff of public schools, vocational service programs, and community-based organizations are trained and supported to assist all individuals with disabilities in achieving competitive employment. TWC also promotes the availability and accessibility of individualized training designed to prepare an individual with a disability for the individual's preferred employment. To this end, individuals with disabilities are given the opportunity to understand and explore options for education and training, including postsecondary, graduate and postgraduate education, vocational or technical training, or other training, as pathways to employment.

Foster Youth

Another priority population for TWC is foster youth. TWC funds transition centers serving both current and former foster youth, ages 14-25. The centers address critical life barriers facing youth who have or will soon age out of the foster care system. They provide access to education, employment training and services, life skills classes, mentoring opportunities, and appropriate support services.

Students and Their Parents

Providing today's youth with education, training, and workplace opportunities is essential to the state's future growth and success. In an effort to ensure that young people have the skills to meet future workforce needs, Texas must support programs that steer students toward in-demand careers from an early age. TWC supports programs that identify educational and career paths for students and their parents, including vocational and technical training, as well as those that require two-year, four-year, and higher education levels.

Educational materials and online tools that help parents, educators, and students identify career pathways are developed and distributed by TWC's Labor Market and Career Information (LMCI) department. TWC works closely with the Texas Education Agency (TEA) and the Texas Higher Education Coordinating Board (THECB) to help communities, schools, and students transition to the new career-focused HB 5 initiatives.

Targeted Economic and Workforce Development Opportunities

TWC's workforce development efforts align with the governor's economic strategies by allocating resources to support opportunities in vital industry clusters. The agency proactively supports science, technology, engineering, and math (STEM) education and training, to ensure that the future workforce is equipped with the knowledge and skills that are in demand by Texas employers. TWC also is committed to supporting job growth in Texas' diverse industries. Energy remains a significant industry in Texas, as demonstrated by the economic activity in the Eagle Ford Shale region and the recovery and growth of employment in the Permian Basin region. Other areas of the state are making strides in manufacturing, information technology, and health care, all of which require a highly skilled workforce.

In this spirit, TWC continues to partner with the Office of the Governor in conducting small business forums across the state. These forums present an opportunity for TWC to connect to small business owners and listen to their concerns and ideas. The forums also provide a chance for TWC representatives and Board staff to assist businesses by introducing new programs or explaining updates to existing programs. These forums have proven very successful and have occurred in all corners of the state.

TWC provides services and programs for U.S. armed service members returning from missions. The Texas Veterans Leadership Program employs peer mentors called Veterans Resource and Referral Specialists to direct returning veterans to resources and services that can help them reenter civilian life and the civilian workforce. Services include job search and employment assistance and identification of education and training resources. Veterans receive preference for jobs posted on TWC's online job matching website, WorkInTexas.com. Additionally, TWC's College Credit for Heroes initiative assists veterans by awarding college credit for experience gained and training completed during military service.

Furthermore, TWC is a diligent and responsible steward of available public resources. The Unemployment Compensation Trust Fund remains in good condition through an efficient bond strategy that keeps employer taxes predictable and stable. TWC continues to seek ways to effectively leverage state and federal funding options to improve current programs and provide additional services.

To provide needed services, TWC consistently leverages multiple funding sources. Federal funds make up the vast majority (85 percent) of TWC's budget. The remaining 15 percent comes from state sources. TWC receives federal funds from the U.S. Department of Labor Employment and Training Administration (DOLETA), the U.S. Department of Health and Human Services, the U.S. Department of Agriculture, and the U.S. Department of Education.

Implementing prior consistent state law set out in Texas Labor Code §302.061 and §302.062, TWC sources block grants from multiple funding streams to workforce areas to administer such programs as WIA (now WIOA), TANF/Choices employment services, SNAP

E&T, and subsidized child care under the federal Child Care and Development Fund. By receiving block grants, Boards are able to provide integrated services across programs and integrated case management. Boards are given the autonomy to use the block grants as needed, to determine the number of staff and Workforce Solutions Offices, etc., necessary to best serve their workforce area. Crafting a cohesive workforce system requires an integration of diverse programs coupled with linkages to facilitate delivery of a full range of services to employers, workers, and job seekers.

Texas is fortunate to have state funding for the Skills Development Fund—one of Texas' premier economic development tools—serve as an incentive to attract new firms to locate in Texas or to help existing companies expand. The Skills Development Fund successfully merges employer needs and local job training opportunities into a winning formula that benefits employers and provides needed skills to workers. Skills grants help incumbent workers upgrade their skills, or help create high-skill, high-wage jobs. The use of these grants for skills development is particularly significant because, unlike formula funding, these funds do not have to be used to serve categorical populations, i.e., the funds can target the workers whom employers identify as needing enhanced skills.

In 2014, TWC's three-member Commission adopted a program goal for AEL to support increases in employment, higher education transition, skill gains, and secondary completion through demonstrated approaches that integrate system services and leverage community partnerships. To meet this goal, AEL grantees implement a diversified service delivery system that delivers both foundational skills and career pathway transitions needed to support and prepare Texans to support their families, careers, and communities.

Integration with the service delivery system established under WIA is vital to the deployment of WIOA. Boards engage and are expected to support AEL grant recipients in various activities that promote student success in career and higher education goals.

TWC and DARS are currently working together to meet the WIOA state plan requirements calling for better integration of WIOA core programs at the state level. Effective September 1, 2016, TWC will assume responsibility for the administration of all WIOA core programs, with the transfer of VR services from DARS to TWC, in accordance with Senate Bill (SB) 208, 84th Texas Legislature, Regular Session (2015).

General and blind VR programs provide a range of services vital to the goal of helping individuals with disabilities prepare for, find, and keep meaningful jobs that pay a competitive salary. As part of the transition process, the agencies will look for opportunities to enhance efficiencies and streamline operations, while meeting all federal requirements and improving overall employment outcomes.

Continued Flexibility through Waivers

Texas has requested federal waiver opportunities in the past to seek relief from provisions that restrict flexibility and innovation or that make inefficient use of staffing resources. With input from Boards and other stakeholders, Texas has developed waiver requests covering a number of workforce issues, including:

- increased local control of program delivery;

- improved Board ability to respond quickly to changing needs within the workforce area;
- increased flexibility at the local level to serve business and industry;
- elimination of duplication with streamlined administrative processes to free up money for services; and
- increased accountability at the state, local, and service-provider levels

TWC also sought federal waiver opportunities following the natural disaster. On October 11, 2017, DOL-ETA approved TWC's WIOA waiver requests to help the agency and Boards respond to the aftermath of Hurricane Harvey. The following is a summary of TWC's six hurricane-related waivers.

Flexibility with WIOA local formula funds

This waiver allows Boards in disaster-affected workforce areas to use up to 100 percent of their available local adult, dislocated worker, and youth formula funds to provide certain statewide activities. Specifically, the waiver allows Boards to:

- use the adult and dislocated worker formula funds for employment and training activities; and
- use youth formula funds to support the development of alternative, evidence-based programs and other programs that enhance the choices available to eligible youth and which encourage youth to reenter and complete secondary education, enroll in postsecondary education and advanced training, progress through a career pathway, and enter unsubsidized employment that leads to economic self-sufficiency.

Capitalization of small businesses with NDWG funds

This waiver sets aside the prohibition on the use of funds for capitalization of businesses at WIOA §181(e) to allow use of NDWG funds to capitalize small businesses that were affected by Hurricane Harvey, up to $5,000 per affected business.

Flexibility with WIOA out-of-school youth expenditure requirement

This waiver reduces the requirement to spend 75 percent of youth formula funds on workforce activities for out-of-school youth to 50 percent in disaster-impacted workforce areas so that those Boards may meet the needs of in-school youth affected by the hurricane.

Youth follow-up services

This waiver allows staff in hurricane-affected workforce areas the flexibility to not provide follow-up services for youth participants if such participants cannot be located or contacted due to the hurricane.

Required WIOA Youth program elements

WIOA §129(c)(2) requires Boards to offer 14 program elements to youth participants. This waiver sets aside that requirement and allows disaster-impacted workforce areas to focus on the youth services or program elements that are most needed by disaster-affected youth.

Use of individual training accounts for in-school youth

WIOA limits the use of individual training accounts (ITAs) for youth to out-of-school youth. This waiver allows disaster-impacted workforce areas and those workforce areas servicing youth from disaster areas to provide ITAs to in-school youth ages 16 to 21.

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).

Alignment of Workforce Programs

After two years of WIOA implementation, TWC has not made significant changes to its strategies. The strategies in place now have been successful. For this reason, no significant changes are planned that would impact TWC's strategies for the next two years.

Texas is a recognized national leader in strategically integrating numerous, complex workforce programs, services, and initiatives. Integration among partners enables the Texas Workforce System to operate in the most efficient and cost-effective manner possible, while remaining both flexible and adaptable, and most importantly, market-based and customer-focused. Nonetheless, TWC and the Boards continue to refine and improve Texas' structure for aligning core and optional programs under WIOA and other available resources to realize the state's vision and achieve its goals.

Improved access and efficiency, along with value-added services, are a few of the many benefits customers receive from the state workforce system. System partners are responsible for the delivery of some 20 workforce education and training programs and related services, as well as education programs that support career preparation and advancement. Strategically, the programs and agencies serve either a common customer or are charged with achieving similar employment and education outcomes for their targeted customer groups, including:

- providing services that facilitate the match between employers and job seekers;
- providing employment, training, and retention services for eligible WIOA participants and prioritizing services to recipients of public assistance and other low-income individuals and individuals who are disabled and/or basic skills deficient, to spur financial self-sufficiency;
- developing adult education and family literacy programs that ensure all adults have the basic education skills they need to contribute to their families and communities;
- providing employment, training, and retention services to individuals with barriers to employment, including veterans, individuals with disabilities, trade-affected individuals, older individuals, ex-offenders, homeless individuals, long-term unemployed individuals, and youth;
- encouraging the use of training services that provide portable, transferable credit and credentials;
- providing support services, such as child care, UI, and transportation to enable eligible individuals to work or participate in employment and training activities;

- monitoring and evaluating compliance of local area service delivery for fiscal accountability and program effectiveness; and
- providing technical assistance to local Boards and training providers to ensure the most effective delivery of workforce services.

As frontline partners in the workforce system, the 28 Boards provide programs and services through a network of Workforce Solutions Offices. Boards work together and also collaborate with business, economic development, educational, and other entities to provide services funded by WIOA and other state and federal sources.

Elements of the Local Delivery Structure

- Board members and staff operate under prior consistent state law; as such, members and staff are primarily private-sector employers, with some representing local education agencies, labor organizations, community-based organizations, economic development councils, and one-stop partners, such as AEL and VR. Each Board develops a strategic and operational plan, with local plans subject to review by TWIC and approval by the governor. Boards designate one-stop partners, identify providers of training services, and monitor system performance against performance accountability measures.
- Board staff conducts the Board's day-to-day administrative operations. Boards operate with a high degree of local flexibility for service delivery design and partner with local training and educational institutions to ensure employment and training opportunities meet area employment needs.
- Workforce Solutions Offices provide a variety of online, in-house, and on-site services, including employer services, job search resources, labor market information, and referrals for customized training. In addition to traditional brick-and-mortar offices, mobile workforce units are a moving extension of the Workforce Solutions Office, offering on-site, rapid response assistance to area employers and communities.
- BSUs address the ever-increasing need for skilled workers in high-demand fields by offering job search assistance, skills training, and other workforce development services. Supported by state and federal funds, most basic services are provided free of charge to employers registered with the state and federal government. Some Boards also provide certain services, including workshops and seminars, at nominal fees. BSUs within an integrated workforce system offer a unique opportunity to ensure that all workforce services are structured to ensure that the business needs are considered when delivering services to job seekers and consumers.
- Texas Association of Workforce Boards (TAWB)—TAWB is a not-for-profit association representing Texas' Boards and more than 750 of the business, education, and community leaders who serve on the Boards. TAWB facilitates communication among the business community, educational providers, and state and federal officials, and provides a forum for members to share best practices.

The Boards are allocated funding from federal, state, and local sources to provide programs and services designed to meet the needs of employers, incumbent workers, and job seekers.

Current Activity

The Boards will develop new local plans under WIOA to align local goals and objectives set forth in the state's plan and also describe collaboration strategies with system partners.

To address limited financial resources yet still meet the needs of Texas' employers, Boards:

- leverage additional funding sources;
- develop, analyze, and share labor market information and regional economic studies;
- engage in planning and service delivery across workforce areas and/or with other workforce and community partners;
- incorporate new, and adapt current delivery-strategies, such as the use of mobile units and new technologies that make service more accessible; and
- strive for integrated, effective service delivery by sharing, modifying, and replicating effective training models and processes.

Events and projects provide the opportunity for Boards and system stakeholders to collaborate, innovate, and streamline services to improve workforce service delivery. Continuous improvement efforts by the Boards are facilitated and encouraged through activities such as:

- sharing best practices and other information at TWC's annual conference, workforce forums, and regional and local meetings; and
- maintaining user-friendly, online resources for topics including:
    - integrated workforce processes;
    - performance measures; and
    - program-specific monitoring toolkits, through the ongoing work of the Quality Assurance Network (QAN, a committee of the Texas Workforce Executive Director's Council that coordinates educational and networking activities for all 28 Texas Boards).

State Leadership in Workforce Initiatives

States have proven to be effective laboratories for innovative workforce initiatives. In Texas, TWC and the Boards can best serve the needs of Texas job seekers, employers, and communities. Boards are most familiar with local needs and opportunities through first-hand knowledge of local partners, and baseline community assessments that ensure extensive local one-stops and the system's initiatives deliver the maximum possible value. Texas believes that federal rules, grants, and base funding should emphasize state roles and maximize a state's flexibility to design effective and comprehensive initiatives.

TWC uses the governor's reserve statewide funding and AEFLA state leadership funding, in conjunction with other funding where feasible and appropriate, to encourage innovation at the local level through grants to Boards, institutions of higher education, community-based organizations, and other suitable entities. TWC prioritizes programs that assist specific populations and initiatives: veterans; youth; and STEM programs. TWC undertakes projects that encourage and improve growth industries, the earning capabilities of job seekers facing barriers to employment, and the effectiveness of Texas Workforce Solutions. Detailed information on strategic initiatives can be found in the operational section of the plan.

Concluding Comments

The strengths of operating an integrated workforce development system are significant. Texas' implementation of WIOA's six core programs supports a service delivery system that meets the needs of employers, and then works to ensure that relevant training and employment assistance is available for job seekers, including those with disabilities—regardless of the funding source.

However, the potential for funding reductions—particularly for programs with specific eligibility and use criteria—are likely to challenge the system. Boards work individually, together, and with other stakeholders to achieve cost efficiencies and a seamless service delivery system. Models exist that, if replicated or expanded, could significantly enhance participant access to a range of workforce and associated support services. Collaborative efforts aid in providing an adequate supply of workers that meet the skills requirements of available jobs, thus assisting the state's employers with retaining and enhancing a competitive economic advantage.

III. OPERATIONAL PLANNING ELEMENTS

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

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 Texas Workforce Investment Council (TWIC) was created in 1993 by the 73rd Texas Legislature. TWIC's purpose is to promote the development of a highly-skilled and well-educated workforce for the state of Texas, and to assist the governor and the legislature with strategic planning for and evaluation of the Texas workforce system.

The scope of TWIC's work is "workforce development," which is defined in TWIC's state statutes as "workforce education and workforce training and services." Workforce education includes articulated career path programs and the constituent courses of those programs that lead to a sub-baccalaureate license, credential, certificate, or degree.

State statute assigns TWIC four primary functions in the Texas workforce system: 1) strategic planning, 2) evaluation and performance measurement, 3) research and continuous improvement, and 4) review of state and local workforce plans in order to recommend final approval by the governor.

TWIC also serves as the state workforce investment board (state board) as required under federal workforce law. As the state board, TWIC operated under the Workforce Investment Act of 1998 (WIA) (Public Law 105-220) since Texas' early implementation of the act in 1999. On July 1, 2015, the Workforce Innovation and Opportunity Act of 2014 (WIOA) (Public Law 113-128) became effective, thereby establishing new federal workforce law and repealing WIA. TWIC continues to serve as the state board under WIOA.

In some states, prior consistent state law has determined that the state board will be largely responsible for system strategic planning and evaluation, and that the state workforce agency will be responsible for program administration.

Because of the significant workforce system reform initiated by the Texas legislature in 1993 and 1995, WIOA contains provisions that allow Texas to retain—or grandfather—major elements of its workforce system that are consistent with WIOA, including TWIC's composition and roles. As a result, the duties assigned to the state board under WIOA are implemented in a manner that is consistent with TWIC's role under state legislation enacted before WIOA. Accordingly, TWIC does not operate programs nor does it directly manage the

flow of state and federal funding to the system's state agencies. Rather, TWIC's focus is strategic, and its functions are guided by the duties and responsibilities established for TWIC by the Texas legislature.

As the state board, federal agencies periodically engage TWIC in its system oversight role to participate in program reviews. For example, in the past TWIC has participated in program reviews and site visits conducted by the U.S. Department of Labor (DOL) Region IV Office, DOL Office of Inspector General, Rehabilitation Services Administration, U.S. Department of Education Office of Adult and Vocational Education, and the Organization for Economic Cooperation and Development.

One of TWIC's key responsibilities is the development of an overarching strategic plan for the Texas workforce system. The state's workforce system is composed of a number of programs, services, and initiatives administrated by agencies and Boards, as well as independent school districts, community and technical colleges, and local adult education providers. System partners are responsible for the delivery of over 19 workforce education and training programs and related services, as well as education programs that support career preparation and advancement.

Texas workforce system partners include the following:

- Governor's Office of Economic Development and Tourism
- Texas Association of Workforce Boards
- Texas Department of Criminal Justice and its Windham School District
- Texas Education Agency
- Texas Health and Human Services Commission and its Department of Assistive and Rehabilitative Services
- Texas Higher Education Coordinating Board
- Texas Juvenile Justice Department
- Texas Veterans Commission
- Texas Workforce Commission

While the system strategic plan is intended to guide system partners in implementing workforce programs, services, and initiatives, it is intended to not duplicate partner agencies' strategic plans. Rather, the system plan is strategic in nature and is focused on the system, and is designed to focus on the most critical outcomes that will make significant progress in achieving the system vision.

Strategic Planning

Section 2308.104 of the Texas Government Code mandates TWIC to develop a "single strategic plan that establishes the framework for budgeting and operation of the workforce development system." The plan must include goals, objectives, and performance measures for the workforce system that involve programs of all state agencies that administer workforce programs. As such, the plan acts out the mission and vision for the Texas workforce system.

State statute also directs TWIC to "develop and implement immediate and long-range strategies to address problems identified within the workforce system."

The primary audience for the system strategic plan is TWIC's partner agencies with workforce programs and services. Covering the period of September 1, 2015-August 31, 2023, the system strategic plan has been devised on an eight-year time frame. This will allow system partners time to align with the new federal workforce requirements under WIOA, and to build programs, initiatives, and systems to achieve the system objectives. During the fourth year of implementation, TWIC will undertake an update of the plan's strategies, action plans, and performance measures, as well as an analysis of the workforce system. This will ensure the continued currency of the plan and will also determine if there are additional issues that should be included in the plan for years five to eight of the implementation period.

In developing the Texas workforce system strategic plan for Fiscal Year 2016-Fiscal Year 2023 (FY 2016-FY 2023), TWIC and its system partners built upon *Advancing Texas: Strategic Plan for the Texas Workforce System FY 2010-FY 2015.* Using a modified planning framework, plan development efforts focused on identifying critical issues and opportunities that system partners must address in the next five to eight years. These were analyzed to determine commonalities across system partners, and were then recast as system objectives. These system-level objectives require collaboration or alignment of programs, initiatives, and outcomes to achieve the stated objective. Structured to avoid duplication with partner agencies' strategic plans, the system strategic plan identifies and magnifies those key future achievements that are critical to the success of the Texas workforce system in serving its customers.

Over the course of the 18-month planning and development process, several strategic imperatives became apparent as key characteristics that serve as foundational or core elements that represent a best-in-class workforce system. These three imperatives serve as cornerstones upon which the capacity of the Texas workforce system should be built in order to successfully identify and respond to changing market conditions and needs of the workforce system customers. These overarching strategic imperatives are core competencies that must be embedded in all system elements to achieve this plan's vision and mission. Therefore, it is a key tenet of this plan that all workforce system partners have core competencies in and a commitment to:

- Customer Service and Satisfaction

  The ability to accurately assess customer satisfaction with and across workforce system elements and translate this data into useful actions is essential to best meet the needs of workforce system customers. While the overall system strategic plan focuses on a demand-driven system, and has particular emphasis on employers, customer service and satisfaction has multiple dimensions that must be factored into system-level planning. Employers, current and future workers, and system program and service providers are key customers of the Texas workforce system.

  The Texas workforce system must have the ability to identify and anticipate changing employer needs related to skills required to meet the dynamic, global economic framework in which Texas employers operate. Ensuring a work-ready and competent workforce that meets the geographically relevant needs of Texas employers is a core competency of the Texas workforce system.

The Texas workforce system must have the capacity to meet the needs of both current and future Texas workers—wherever they are in their careers. Customers must be assured that wherever they enter the workforce system, that there is a pathway *through* the system by instituting a "no closed door" culture to ensure successful outcomes or referrals for customers of the Texas workforce system programs and services. Any point of entry provides access to the full continuum of programs and services.

The Texas workforce system must promote and enable successful collaboration across system partners for the ultimate purpose of improving outcomes for Texas employers and the current and future workforce. The ability to serve Texans collaboratively is the responsibility of all system partners, and facilitating this collaboration is an integral part of this plan.

- Data-Driven Program Improvement

Program and other data from across the workforce system are critical in evaluating the extent to which workforce system programs, services, and products are meeting the needs of customers and stakeholders. The collection of key data, as well as the reporting and analysis of that data—in a consistent and useful manner—are essential in demonstrating outcomes, determining if changes are required or desired, and establishing benchmarks for future performance. To achieve these data-related organizational competencies relative to the performance measures noted in this plan, it is recognized that partner agencies may need to build or modify their existing data systems. By doing so, the Texas workforce system can measure what matters most and build the collection and analysis capabilities that are missing.

Information and data also serve a vital communication purpose, not only within the Texas workforce system but also to key stakeholders and others that participate in this process across multiple dimensions. Systems that improve the flow of data, information, and analysis that support effective decision-making across the spectrum of data users are essential to achieve effective and efficient programs, services, and outcomes. While this is a challenging task, it is nonetheless essential to the overall performance of the Texas workforce system.

- Continuous Improvement and Innovation

The Texas workforce system is part of a dynamic, competitive, and global marketplace. In order to achieve the vision and mission for the workforce system that is articulated in this plan, a commitment to continuous improvement and innovation is essential to ensure an adaptive and best practice-oriented workforce system. Actions that are essential to continuous improvement and innovation include the following:

  - Research and assess best-in-class practices throughout industry and workforce systems nationally and internationally.
  - Incorporate promising practices from outside the Texas workforce system.

- Analyze program and system performance and move quickly to correct the course, when appropriate, as indicated by empirical data and information.
- Streamline data, information, communications, and decision-making capabilities to ensure improvement and innovation become embedded into all system elements by ensuring core competencies are developed and nurtured throughout the system.

Crucial to the strategic planning process and in order to align with federal and state statute, the Texas workforce system strategic plan builds upon the system's core elements and contains system goals that TWIC and its planning partners use to create actionable objectives to meet the vision and mission of the system. Four goal areas and their corresponding system objectives and partner strategies have been identified through the processes previously noted.

Goal	System Objective
Focus on Employers	Increase business and industry involvement and expand licensure and industry certification.
Engage in Partnerships	Expand partnerships with system partners and stakeholders to promote collaboration, joint planning, and enhanced participant outcomes.
Align System Elements	Improve and enhance services, programs, and policies to facilitate effective and efficient transitions. Develop and implement policies and processes to ensure portable and transferrable credit and credentials.
Improve and Integrate Programs	Employ enhanced or alternative program and service delivery methods.

The Texas workforce system strategic plan calls attention to issues and opportunities that have cross-partner implications and hold significant strategic value to the overall success of the system's ability to meet its vision and mission. Throughout the course of the plan's development, consideration was given to identifying and assessing high-priority, high-impact issues by system partners, stakeholders, and TWIC for the fundamental purpose of improving performance and outcomes for the workforce system and its customers.

Through careful evaluation, TWIC and other stakeholders identified the following issues that cross the programs or services administered by multiple agencies (cross-partner issues) to be considered as part of the strategic planning process. The following 12 cross-partner issues and opportunities were derived from the 39 planning issues and opportunities previously identified by TWIC and its system partners during preplanning listening sessions and consultations:

- Facilitate effective and efficient transitions and enhance transition services.
- Increase employment outcomes.
- Expand partnerships with system stakeholders and promote collaboration and joint planning.
- Incorporate/expand options for dual credit and/or licensure and certification.

- Increase business and industry involvement.
- Align programs and services.
- Share timely data and information.
- Promulgate promising practices and reduce duplication.
- Recruit and/or provide professional development.
- Ensure portable and transferrable options.
- Address skills shortages.
- Institutionalize alternative service delivery methods.

In September 2015, the FY 2016-FY 2023 workforce system strategic plan was endorsed by TWIC and submitted to the governor for approval.

2. IMPLEMENTATION OF STATE STRATEGY

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

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, as appropriate.

TWC is the state agency in Texas that administers all core programs, with the exception of the Vocational Rehabilitation (VR) program, presently administered by the Texas Department of Assistive and Rehabilitative Services (DARS). TWC is also responsible for the partner programs included in this plan. Effective September 1, 2016, TWC will assume responsibility for the administration of all WIOA core and partner programs, with the transfer of VR services from DARS to TWC, in accordance with Senate Bill (SB) 208, 84th Texas Legislature, Regular Session (2015).

TWC and the 28 Boards, and their contracted services providers and community partners, continue to follow the principle of full integration of core programs. The strategy of alignment, coordination, and integration of education and employment and training programs is underway and virtually fully realized. Customers have local access to workforce solutions and statewide services at numerous Workforce Solutions Offices. Texas Workforce Solutions provides workforce development services that help workers find and keep good jobs and help employers hire the skilled workers they need to grow their businesses.

The DARS Division for Blind Services (DBS) and Division for Rehabilitation Services (DRS) administer the VR programs that help individuals with physical or mental disabilities prepare for, find, or keep employment. VR provides specialized services to help Texans with disabilities find the high-quality jobs or training needed to be successful in school and beyond in order to live independent lives. The VR programs also offer a variety of services to assist businesses with hiring, training, and retaining qualified individuals with disabilities.

The alignment across programs does not lack for coordination and cooperation in serving Texans. All allowable activities are provided, as appropriate, and colocated for the WIOA Adult, Dislocated Worker, and Youth and Wagner-Peyser Employment Service core programs. VR and Adult Education and Literacy core programs are not colocated with the Adult, Dislocated Worker, and Youth, and Employment Service core programs: though ideal, to do so would place a financial and operational burden on the workforce system. To best affect alignment, coordination, and integration, TWC, in coordination with the Boards, Tele-Center operators, and VR providers, will maintain the existing referral systems in place to meet the needs of our customers.

Texas maintains an advantage in the provision of services to employers, job seekers, and special population groups, including low-income and basic skills deficient individuals, as well as veterans, by the colocation of core programs. The advantages are as follows:

- By administering five of the six programs now—and the sixth in September 2016—TWC has set the stage for the provision of comprehensive and seamless provision of workforce services.
- Provides for a synergistic advantage of the elimination of duplication and added efficiency in the management of funds.
- TWC maintains its provision of WD Letters to the workforce areas, thereby conveying guidance and technical assistance consistently across programs, as appropriate.
- Administering five of the six programs provides the workforce system the advantage of guiding investments where they are needed most, which in turn, allows for more control in the provision of services to employers and job seekers.

Core Program Activities to Implement the State's Strategy

The following activities support WIOA core programs and align with the state's strategies, as previously described.

TWC administrates the development and integration of workforce services in tandem with the Board's oversight and planning efforts. Service delivery is executed through Texas Workforce Solutions, which may contract with one-stop providers to operate a variety of program components. This network gives customers local access to workforce solutions and statewide services at approximately 200 Workforce Solutions Offices, four UI Tele-Centers, and numerous partner locations.

WIOA has reinforced Texas' progress toward integrating services for customers. WIOA §193(a)(3) provides that Boards' contracted workforce service providers and community partners are defined under prior consistent state law.

Sections 302.021 and 302.062 of the Texas Labor Code set forth the job training, employment, and employment-related educational programs and functions consolidated under the authority of TWC. In Texas, prior consistent state law defines the Boards' responsibility to develop, implement, and modify a plan for convening all relevant programs, identified as one-stop required-partner programs, including:

- Workforce Innovation and Opportunity Act (WIOA, formerly Workforce Investment Act (WIA))

- Wagner-Peyser Employment Service (ES)
- Unemployment Insurance (UI) Benefits Information
- Choices, the Temporary Assistance for Needy Families (TANF) employment and training program
- Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)
- Subsidized child care
- Trade Adjustment Assistance (TAA)
- Adult Education and Literacy (AEL) programs

The 84th Texas Legislature, Regular Session (2015), amended the Texas Labor Code by adding Title 4, Subtitle 4, which transfers the following programs from DARS to TWC on September 1, 2016:

- VR (WIOA, Title IV) programs
- Business Enterprises of Texas
- Grant for Independent Living Services for Older Individuals Who are Blind
- The Criss Cole Rehabilitation Center

Prior consistent state law further defines the following as required one-stop partner programs. Other than UI compensation, which is administered by TWC, the programs are not under the direct oversight of the Boards; therefore, Boards are required to establish memoranda of understanding (MOUs) with:

- Adult Education and Literacy (WIOA, Title II);
- Apprenticeship programs;
- National and Community Services Act Program;
- Non-Certificate Postsecondary Career and Technology Training programs; and
- Senior Community Service Employment Program.

TWC also recommends that Boards enter into MOUs with the following optional partner activities:

- Career and technical education programs authorized under the Carl D. Perkins Act of 2006
- Job counseling, training, and placement services for veterans, 38 USC 41
- Education and vocational training program through Job Corps administered by DOL
- Native American programs authorized under Title I of WIOA
- HUB-administered employment and training programs
- Employment and training activities carried out under the Community Services Block Grant Act
- Reintegration of offenders programs authorized under the Second Chance Act, 2007
- Migrant and Seasonal Farmworker programs authorized under Title I of WIOA

Additionally, Boards are encouraged to continually expand and enhance their network by forming partnerships outside of the Workforce Solutions Offices. Some agencies and services with which Boards establish additional cooperative relationships include the following:

- Local boards of education
- Local-level vocational education agencies
- Community-based Organizations (CBOs)
- Faith-based Organizations (FBOs)
- Texas Department of Housing and Community Affairs (TDHCA)
- Other appropriate training and employment agencies and services to expand local presence

TWC also requires Boards to jointly develop and adopt an MOU with HHSC. Although HHSC is a federal optional one-stop partner, the MOU fulfills state law regarding the coordinated interagency case management of recipients of financial assistance in employment and training activities and support services (Texas Human Resources Code §31.0128), and reflects Texas state law mandating their integration within TWC.

Pay-for-Performance Contract Strategy

TWC and Boards will maintain, where applicable, performance-based contracts. As in the past, however, TWC and Boards will consider developing, with stakeholder input, a WIOA pay-for-performance contracting strategy applicable to Title I programs, as defined in WIOA §3(47).

The development of a performance-based contract is contingent on the pay-for-performance contract strategy, which establishes specific benchmarks that must be achieved in order for the contractor to receive payment. WIOA calls for the benchmarks to be tied to the prime indicators of performance and adjustments thereof related to economic conditions and the population demographics.

TWC intends for pay-for-performance contract strategies to be implemented in accordance with further guidance regarding WIOA performance requirements. Additionally, DOL's guidance is sought for both state and local areas in developing the broader pay-for-performance contract strategy, including the scope and minimum requirements of the required feasibility study, as presented in the Notice of Proposed Rule Making (NPRM) (document no. 2015-05530).

TWC will continue to allow Boards to use performance-based contracts that are not WIOA pay-for-performance contracts. Furthermore, TWC will maintain the latitude provided for in WIOA to consider the development of a pay-for-performance contract strategy as guidance is issued.

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.

Apprenticeship and Job Corps

The state-funded apprenticeship program serves employers and job seekers by training workers for well-paying jobs with promising futures. Texas law and rule support only DOL-registered apprenticeship training programs, which pay part of the cost of job-related classroom instruction. TWC coordinates the state's apprenticeship training program, applying approximately $1 million in WIOA statewide-discretionary funds to supplement state general revenue. The Texas legislature budgets approximately $1.5 million in general revenue each year of the current biennium. In FY 2015, 4,648 apprentices participated in the apprenticeship training program, exceeding the Legislative Budget Board (LBB) performance measure of 3,600.

In June 2014, TWC adopted new program rules, including a provision authorizing development and adoption of annual performance measures and targets for apprenticeship training. The new rules also changed the funding mechanism for determining eligible programs from strictly an application process to considering past performance of apprenticeship training. Apprenticeship programs have demonstrated that employers that invest in training have lower employee turnover, increased employee productivity, better employee problem-solving skills, and improved employee relations. The employer and employee are equally committed to the program's success.

Beginning in FY 2016, TWC's new Apprenticeship Training performance measure has increased from 4,400 to 6,111 individuals served/trained per year, as established with the approval of TWC's Legislative Appropriation Request of an additional $1.5 million in FY 2016 and FY 2017. With these additional funds, TWC can help address demand for apprenticeship jobs across Texas.

Job Corps, a DOL vocational training program for disadvantaged youth and young adults, is one of seven programs authorized under Title I of WIOA and a required partner in the local one-stop systems (WIOA §121(b)(1)(B)). Other required partners administer the Native American program and YouthBuild and MSFW programs. Currently, the Dallas Regional Office of Job Corps oversees seven centers in Texas, in addition to Job Corps centers in Arkansas, Colorado, Louisiana, Montana, New Mexico, North Dakota, Oklahoma, South Dakota, Utah, and Wyoming. Job Corps participants receive social, academic, career and technical education, and service-learning opportunities, primarily in a residential setting. Program objectives focus on participants obtaining secondary school diplomas or recognized credentials leading to careers in high-demand industries or occupations.

Child Care Services

Each day, more than 102,000 children from low-income families receive federally subsidized child care through TWC. TWC's Child Care Services program promotes long-term self-sufficiency by enabling parents to work or attend training activities while their children receive quality care. Boards design and manage the delivery of child care services for eligible participant families. TWC also provides consumer education to parents on quality child care available in their community and promotes child care quality improvement through the Texas Rising Star (TRS) program, which certifies child care providers that meet higher levels of quality beyond the minimum child care licensing standards. Additionally, TWC fosters child care quality improvement through activities that serve children with disabilities and strengthen professional development related to child health, safety, early learning, and literacy.

Foster Youth

TWC recognizes that helping foster youth and those aging out of foster care transition to independent living requires more than addressing the need for shelter, food, and safety. Intensive and coordinated efforts are required from public agencies and community organizations, professionals, community leaders, and concerned volunteers to support youth in becoming engaged, responsible, and economically self-sufficient adults.

To these ends, Boards are encouraged to establish relationships with local entities serving foster youth, in particular working with the Texas Department of Family and Protective Services (DFPS) Preparation for Adult Living (PAL) program. TWC recommends that Boards partner with PAL staff to set up the appropriate processes to refer foster youth to Workforce Solutions Offices for job readiness/job search assistance, career exploration, higher education enrollment assistance, housing assistance, and mentoring. As a result:

- eligible foster youth receive priority over all other eligible individuals—except veterans—in federal and state-funded services (this priority is applied within the priority order for WIOA adult services set forth in Training and Employment Guidance Letter No. 3-15; and
- workforce services are prioritized and targeted for youth transitioning out of the foster care system and for former foster youth.

The Boards' objectives include:

- increasing the employability of foster youth through education and training;
- arranging for or providing services that will help foster youth obtain and retain employment;
- matching foster youth with potential employers; and
- providing support and transitional services to:
    - youth in, or aging out of, foster care; and
    - former foster youth.

TWC has supported foster youth transition centers through partnerships with DFPS and their providers since 2004. The transition centers offer education, employment and training services, life-skills classes, mentoring opportunities, and appropriate support services through an all-in-one assistance system for older youth, homeless youth, and other at-risk youth, ages 15.5 to 25.

Temporary Assistance for Needy Families

TWC and the Boards are responsible for the employment and training activities of recipients of public assistance. Texas has established a work-first service delivery approach to assist recipients in the transition from dependency to self-sufficiency. Texas emphasizes personal responsibility, time-limited cash assistance benefits, and the goal of work instead of public assistance. TWC also partners with the Texas Health and Human Services Commission (HHSC) in interagency initiatives to implement welfare reform.

Choices is Texas' TANF employment and training program, which assists applicants, recipients, and former recipients of TANF, in preparing for, obtaining, and retaining

employment. One or both adults in a two-parent household are responsible for meeting the family's mandatory work requirement. Choices provides individuals with services necessary to meet the needs of local employers, including job-search and job-readiness classes, basis skills training, education, vocational training, and support services. From the point of applying for cash assistance through the delivery of benefits and employment services, Choices participants receive consistent messages:

- Government assistance is temporary.
- Texans are responsible for the support of themselves and their families.
- Employment is the goal.

In FY 2012, TWC established new program parameters to provide Boards with the flexibility to design and deliver services that assist Choices customers in entering employment quickly. Under 45 CFR §261.10, states have the flexibility to define what it means to "engage in work." For the purposes of the work participation rate, Texas considers a Choices-eligible individual to be engaged in work when participating in:

- unsubsidized employment;
- subsidized employment;
- OJT; or
- educational services—for Choices-eligible individuals who have not completed secondary school or received a GED credential.

The Workforce Orientation for Applicants (WOA) is an introduction to Workforce Solutions Office services. TANF applicants are required to attend a WOA as a condition of eligibility, unless exempted by HHSC. Once approved for benefits, TANF recipients must attend an Employment Planning Session (EPS).

During an EPS, Choices staff meets with TANF recipients to introduce them to Choices services, develop an in-depth assessment, and develop a Family Employment Plan. Participation for most recipients includes job-readiness activities and job-search activities as a means of testing the labor market and locating employment at the earliest opportunity. Job-readiness activities include the following:

- Self-esteem building
- Job search skills
- Labor market information
- Employment goal setting
- Résumé writing
- Interviewing techniques
- General workplace expectations
- Job retention skills

Almost all Choices participants engage in structured job-search activities, with the goal of unsubsidized employment at the earliest opportunity. Participants are responsible for making a designated number of employer contacts per week. Additionally, Workforce Solutions Office staff makes job referrals and provides job development activities to assist

participants in their job search. Those who become employed may also be enrolled in other workforce programs to receive postemployment services.

Noncustodial Parent Choices

The Noncustodial Parent (NCP) Choices program is a collaborative effort between TWC, the Office of the Attorney General (OAG) of Texas, Boards, Workforce Solutions Office staff, and family court judges. The program serves low-income unemployed or underemployed noncustodial parents (NCPs) who are behind on their child support payments and whose children are current or former recipients of public assistance. The program helps NCPs overcome barriers to employment and career advancement, become economically self-sufficient, and become able to make consistent child support payments.

The services provided to NCPs mirror the services for TANF recipients under the Choices program, including:

- job referrals and job development;
- support services;
- short-term training;
- subsidized employment/work experience;
- GED and English as a Second Language (ESL) classes; and
- retention and career advancement assistance.

Despite the fact that this is one of the hardest-to-serve populations, the NCP Choices program has seen positive employment, job retention, and child support results. The following program information was collected between August 2005 and July 2015:

- 24,492 NCPs served;
- 71 percent of participating NCPs entered employment; and
- 77 percent of participating NCPs entering employment retained employment for at least six months.

Additionally:

- custodial parents are 21 percent less likely to receive TANF benefits; and
- more than $191 million in child support was collected through August 2015, some of which was used to repay TANF, Medicaid, foster care, and child support collections programs.

TWC also encourages collaboration and coenrollment with other programs when appropriate to ensure the NCP receives a range of services.

Supplemental Nutrition Assistance Program Employment and Training

HHSC is the lead administering agency for SNAP in Texas. Under Texas law, TWC has been designated as the state agency to administer the SNAP E&T program. HHSC determines eligibility and status, and then electronically transmits this information to TWC. For its part, TWC partners with the Boards in managing the SNAP E&T program. Comprehensive services—including job search, training, workfare (i.e., community service), work

experience, vocational and basic education components, and support services—are designed to improve the recipient's ability to obtain and retain regular employment, increase earnings, and reduce dependency on public assistance.

Individuals with Limited English Proficiency

Individuals with limited English proficiency (LEP) are a large and growing population of job seekers in Texas. TWC continues to develop policy guidance and technical assistance to ensure meaningful access to workforce services for all customers. TWC integrates English literacy with civics education, workforce preparation activities, secondary education, and occupational skills training. This approach stresses contextualized learning to transition participants to postsecondary education, further skills training, or lead to employment.

TWC staff has simultaneously supported the creation of more accessible workforce development services at state, regional, and local events with the *LEP Guide for Workforce Professionals* (LEP Guide). The LEP Guide assists workforce, education, and training professionals in planning, developing, and implementing strategies to improve LEP customer outcomes. Boards, Workforce Solutions Offices, and education and training professionals use the LEP Guide as a blueprint for intake and case management, promotion of nontraditional occupations and entrepreneurial opportunities, evaluation of LEP training services, and LEP skills assessment.

Homeless Individuals

TWC strives to make services available to individuals with barriers to employment, including homeless populations, as identified by WIOA §171(b)(4). As part of this effort, TWC serves on the Interagency Council for the Homeless, a group charged with collaborating and planning the provision of services to the homeless and those at risk of becoming homeless. TWC also partners with grantees of DOLETA's Homeless Veteran Reintegration Program (HVRP) to offer job search and placement services, occupational training and counseling, and other vital assistance.

Additionally, Boards are charged with establishing collaborative partnerships with housing authorities and sponsors of local housing programs to address unmet housing needs of Choices recipients. Workforce Solutions Office staff performs initial and ongoing assessments to determine the employability needs of individuals; assessments must report unmet housing needs and whether those needs are a barrier to full participation in the workforce and progression to self-sufficiency.

Ex-Offenders

TWC is a member of the State Reentry Task Force, led by the Texas Department of Criminal Justice (TDCJ) and supported by other public and private entities, in addition to family- and faith-based organizations. TWC and TDCJ coordinate reporting data services between the criminal justice and workforce systems. Through a nightly automated interface, TWC receives information on adult ex-offenders and adjudicated youth and reentry activities conducted in the corrections system.

These populations are included in the term "individuals with barriers to employment," as used under WIOA §3(24). Ex-offenders have access to employment and vocational training services under Texas' universal workforce investment system. Additionally, fidelity bonding

for employment is offered and marketed for certain at-risk job seekers, including individuals in the ex-offender population.

C. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO INDIVIDUALS

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

Innovative, progressive services promote a stronger Texas, and Texas Workforce Solutions continuously works to provide value-added services to improve customers' opportunities for growth. To this end, the system is designed to integrate at the federal, state, and local levels the implementation, administration, service delivery, and evaluation of workforce development programs, including core programs under WIOA: the adult, dislocated worker, and youth formula programs administered by DOL under Title I of WIOA; the Adult Education and Family Literacy Act (AEFLA) program administered by the U.S. Department of Education (DOE), as reauthorized by Title II of WIOA; the Wagner-Peyser Act ES program administered by DOL, as amended by Title III of WIOA; and the VR program administered by DOE, as amended by Title IV of WIOA.

The Texas Workforce Solutions network helps individuals connect with employment and training opportunities in industries that offer growth and career advancement. The following are some of the many workforce development activities that Texans receive.

Employment Services

Workforce Solutions Offices provide a variety of free job-search resources, tools for individuals with disabilities and other barriers, networking opportunities for those seeking work, and other resources. The employment service delivery model rests on three broad types of assistance:

1. Basic career services. Basic career services consist of determining eligibility to receive assistance under the WIOA Adult, Dislocated Worker, or Youth programs; outreach, intake, and orientation to information and other services; and initial assessment of skill levels.

Job Matching Resources, such as WorkInTexas.com—the largest free job-matching network in Texas—and other labor exchange services, coupled with referrals to specialized business services, are an invaluable element of basic career services.

Career Planning Information is another service that provides workforce and labor market employment statistics (disseminated by TWC's LMCI department), performance and program cost information on eligible providers of training services, and information on local area performance.

Information is also provided on the availability of support services, including child care, assistance in filing for and obtaining information on unemployment compensation,

assistance in establishing eligibility for programs of financial aid for training, and education programs not part of WIOA.

Customers may use many of the basic career services in a self-directed manner, through resource rooms, as well as through WorkInTexas.com, TWC's job-matching system. WorkInTexas.com provides matching options based on skills and experience and also links to labor market and career development information. Merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with DOLETA regulations.

For job seekers requiring minimal staff assistance, Workforce Solutions Office staff is available to facilitate self-help services. Self-help services may range from résumé preparation to gathering labor market information and receiving career guidance, as well as referrals to other programs, such as educational services, bonding assistance, and transition assistance for individuals leaving the military.

Additionally, under the Board's direction, staff develops alternative service delivery points and trains volunteers and staff of other organizations to expand facilitated self-help services in places such as libraries, community-based organizations, and faith-based organizations.

2. Individualized career services. As consistent with program requirements and federal cost principles, individualized career services include the following:

- Comprehensive and specialized assessments of skill levels and service needs of adults and dislocated workers;
- Development of an individual employment plan;
- Group counseling;
- Individual counseling;
- Career planning;
- Short-term pre-vocational services;
- Internships and work experiences linked to careers;
- Workforce preparation activities;
- Financial literacy services;
- Out-of-area job search assistance and relocation assistance; and
- English language acquisition and integrated education and training programs.

Re-employment Assistance is another way TWC and its Texas Workforce Solutions partners seek to assist those who lose employment because of unforeseen circumstances. For example, TWC leverages available funding resources, such as National Emergency Grants (NEGs) from DOE to support the increased training capacity of Boards.

Workforce Training Programs are identified for some job seekers unable to find employment through basic labor exchange services. Such services represent a short-term opportunity to improve the skill levels of eligible job seekers and assist with a more rapid return to the workplace for workers with transferable skills.

When a job seeker remains unsuccessful in returning to employment, more extensive training may be the solution. TWC supports a variety of training programs to support a ready workforce equipped with the skills needed by Texas employers. Training services include occupational skills training, OJT, programs that combine workplace training with

related instruction, skills upgrading and retraining, and adult education and literacy services in combination with training.

3. Follow-up services. Follow-up services are provided, as appropriate—such as counseling on the workplace for participants in adult or dislocated worker workforce investment activities who are placed in unsubsidized employment—for up to 12 months after the first day of employment.

Labor Law Services

TWC's Labor Law Investigations Department ensures the timely payment of workers' wages and safeguards the safety, health, and well-being of children in the workplace through the administration of the Texas Payday Law and the Texas Child Labor Law. TWC does not have enforcement authority under the Texas Minimum Wage Act; however, it does disseminate information to the public.

Unemployment Insurance Claimants

TWC focuses on making unemployment insurance (UI) claimants a priority population and improving claimant reemployment without the use of additional funding. The workforce system's focus on this population provides:

- a faster return to work;
- employers with skilled workers who have recent work experience; and
- a positive impact on the UI trust fund.

TWC administers the UI program and workforce services, allowing for close coordination between the two programs. Computer linkages between WorkInTexas.com (the workforce job-matching system) and the UI automation system ensure that UI claimants have registered and comply with work search requirements. TWC administers the UI work test requirement through an automated link between WorkInTexas.com and the UI automation system. This link ensures that notification is made when UI claimants fail to comply with work search requirements, including negative referral results or failure to report a call-in or employment. UI claimants who fail the UI work test are held ineligible for benefits until they meet their work test requirements.

Claimants eligible for UI benefits must make a minimum of three work search contacts weekly, as described in TWC rule 815.28 (40 TAC Part 20). However, the rule allows each Board to modify the appropriate number of work search contacts required of UI claimants, according to the local labor market conditions. Boards establish the weekly work search requirements by county. They can raise the minimum required number of weekly work search contacts above three, and in rural counties, lower the number required.

Since the initial state plan was submitted, TWC has been awarded funding from DOL for the Reemployment Services and Eligibility Assessments (RESEA) grant. RESEA targets UI claimants determined likely to exhaust benefits using methods established for the Worker Profiling and Reemployment Services (WPRS) program. In Texas, the WPRS program has historically been referred to as the Rapid Reemployment Services (RRES) program, which RESEA is replacing. The intent of RESEA is to provide UI claimants with a wide array of available resources that support reemployment and connect them to career services,

including coenrollment in the WIOA Dislocated Worker program or other program services, as appropriate.

Much like RRES, RESEA connects participants with in-person assessments and reemployment services through local Texas Workforce Solutions Offices. Activities include developing an individual employment plan (EP), providing labor market information, identifying job skills and prospects, and reviewing claimants' continued UI benefit eligibility.

TWC has implemented RESEA by providing guidance to Boards about the program's service requirements. Boards were notified about the requirement to outreach 100 percent of claimants with a cutoff score higher than the score established by TWC for each Board. RESEA requires that the UI eligibility assessment and the individual EP services are completed in person. Remote service delivery methods, such as phone or Skype, are not allowed for these two services. However, in-person services may be provided at alternative locations, such as a mobile unit or library. Other services, including RESEA orientation, may be provided remotely.

Long-Term Unemployed

DOLETA defines "long-term unemployed" as someone who has been jobless for 27 weeks or longer. TWC strives to assist and place out-of-work individuals before they reach that point.

As part of this effort, TWC developed a performance measure that tracks a Board's success in placing job seekers in employment within 10 weeks of their initial monetary eligibility. Boards meet this measure by providing quality job posting and job development activities as well as increased outreach to participants to improve applications and referrals. Workforce Solutions Office staff also attempts to re-engage claimants after a period of unemployment, when claimants are usually more amenable to accepting assistance.

Additionally, TWC has dedicated statewide funding to assist this population in reconnecting to employment. A workgroup consisting of Board representatives recommended using WIA Incentive Grant Award Funds to assist Texas' long-term unemployed. These recommendations were approved by the Commission on November 4, 2014:

- $750,000 to be distributed to Boards that do not already have grant funding for serving the long-term unemployed, to be used in delivering services; and
- $115,417 to facilitate sharing best practices and strategies for serving the long-term unemployed.

Fourteen Boards are participating in this initiative and are currently providing services to long-term unemployed individuals. TWC is monitoring the Boards' use of these funds, the strategies implemented, and the results in connecting with long-term unemployed individuals.

Employment Discrimination

TWC's Civil Rights Division (CRD) enforces laws that prohibit employment and housing discrimination in Texas. Overseen by the Commission, CRD receives, investigates, and seeks to mediate, settle, conciliate, or litigate employment discrimination complaints filed on the basis of race, color, sex, national origin, age, religion, or disability. In Fiscal Year (FY) 2014,

CRD investigated and closed 646 employment complaints. Of those complaints, 91 were no-fault settlements, and 79 were withdrawals with settlement.

Adult Education and Literacy

The state's Adult Education and Literacy (AEL) program transitioned from the Texas Education Agency (TEA) to TWC in FY 2014. TWC completed essential rulemaking in winter 2013, and restructured the local provider system and state and professional development services that deliver teacher training and program support and innovation. The transition of the AEL program to TWC strengthens and expands TWC's workforce development and education capacity by aligning a statewide system of AEL providers with the network of Workforce Solutions Offices.

To strengthen the program's career and postsecondary education and training outcomes, TWC is implementing strategies that include enhanced enrollment and performance criteria, incentives for innovative acceleration, and integration and transition models, such as the Accelerate Texas integrated education and training model (implemented in coordination with THECB). The objective of Accelerate Texas is to build capacity and expand deployment of career pathway programs, which support robust employment, higher education transition, skills gains, and secondary completion through demonstrated approaches that integrate system services and leverage community partnerships.

Strategic integration with the service-delivery system established under WIOA is vital. Boards engage and support AEL grant recipients in various activities that promote student success in career and higher education goals.

Types of workforce system integration and alignment through Boards and their Workforce Solutions Offices include:

- executing responsibilities as the AEFLA grant recipient (three Boards) and strategic managing organization (four Boards) in AEL consortia;
- strategic and program design guidance for career pathways through analysis of employment statistics and local labor market information, regional economic development, and industry or occupational demand studies;
- colocation of classes in Workforce Solutions Offices; and
- referral and coenrollment in other workforce programs to support student retention, transition, and employment success.

Youth Services

Texas shares the purposes of WIOA, including fostering integrated systems, coordinated services, career pathways, and multiple forms of engagement with businesses to benefit all customers, particularly youth. These ends recognize that career and personal success is a result of lifelong learning and continued growth in skill and abilities.

Boards develop a strategic and operational plan for implementing WIOA youth programs consistent with the governor's vision of strengthening the academic and future workplace outcomes for youth facing challenges and barriers to success. Boards design activities consistent with the specific eligibility criteria for two groups described in the WIOA Title I youth formula-funded program: in-school youth (ISY) and out-of-school youth (OSY).

Boards are encouraged to conduct thorough analysis of local gaps in youth-serving programs, and then identify the most appropriate education or training, or employment activities, to undertake. Certain services of WIOA youth programs are required, as proposed by regulation §681.460 of WIOA §129(c)(2), including the following:

- Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to a high school diploma or its recognized equivalent or postsecondary credential;
- Alternative secondary school services or dropout recovery services;
- Paid and unpaid work experiences that have academic and occupational education as a component, such as summer and nonseasonal employment, pre-apprenticeship programs, internships and job shadowing, and on-the-job-training, in the private for-profit or nonprofit sectors;
- Occupational skills training, which includes priority consideration for training programs that lead to recognized postsecondary credentials in in-demand industries or occupations in the local area;
- Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation;
- Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors;
- Support services, such as linkages to community services, assistance with transportation, child and dependent care, assistance with housing, needs-related payments, assistance with educational testing, reasonable accommodations for youth with disabilities, referrals to health care, and assistance with uniforms or other appropriate work attire and tools;
- Adult mentoring for at least 12 months;
- Follow-up services for not less than 12 months after completing participation;
- Comprehensive guidance and counseling, such as drug and alcohol abuse, as well as referrals to counseling, as appropriate;
- Financial literacy education;
- Entrepreneurial skills training;
- Services providing 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
- Activities that help youth prepare for and transition to postsecondary education and training.

Every individual meeting criteria for ISY or OSY eligibility may participate in the above services, if formally enrolled in the program and appropriate for the participant's assessment and individual service strategy. Continuous performance assessment, technical assistance, and monitoring are fundamental to the Boards' compliance with the design framework service of local youth programs, as proposed in regulation §681.420.

Outreach specialists dedicated to the Migrant and Seasonal Farmworker (MSFW) community collaborate with Boards to inform youth in this targeted population of educational, training, and employment services. Concurrently, local youth-serving agencies

facilitate counseling of MSFW youth on programs to complete their secondary education and prepare for economically sustaining employment.

Boards recognize that successful implementation of WIOA's purposes rests on youth programs that reconnect OSY to education and jobs. The OSY population consists in large part of high school dropouts who are likely to face significant barriers to employment. As required by WIOA, Boards expend a minimum of 75 percent of the youth formula funds on serving OSY (in contrast to the 30 percent required under WIA).

Youths who are no longer in the public school system and are seeking to enter the labor market may face extraordinary barriers. Boards work to design services that:

- acknowledge the challenges and characteristics of inexperienced job seekers;
- obtain and use information concerning the conditions of employment affecting youth and labor laws restricting their employment;
- develop and maintain effective relationships with schools, colleges, and other training providers; and
- develop employment opportunities for youth with career potential.

Individuals with Disabilities

At the federal, state, and local levels, TWC continues to make great strides toward a streamlined and coordinated one-stop delivery system serving adults and youth with disabilities and employers that employ these individuals. TWC's executive director and the commissioner of assistive and rehabilitative services (transferred to TWC as of September 2016) participate as ex officio members of the Governor's Committee on People with Disabilities. TWC also serves on state-level interagency councils and workgroups supporting gateways for individuals with disabilities, such as the Employment First Task Force and the Texas Department of Aging and Disability Services' (DADS) Promoting Independence Advisory Council. Other memberships have included the Texas Department of Assistive and Rehabilitative Services' (DARS) Medicaid Infrastructure Grant Advisory Council, and HHSC's House Bill 1230 Workgroup on Transition Services for Youth with Disabilities. TWC will also continue to coordinate with the State Independent Living Council (SILC) and the Centers for Independent Living (CILs) to serve mutual consumers who need employment assistance as well as assistance with independent living resources. In this vein, TWC has collaborated with a number of agencies in developing guidance, such as a transition and employment guide for Texas students with disabilities.

On a local level, MOUs established between Boards and one-stop partners set forth the operation of the one-stop delivery system to seamlessly and meaningfully serve individuals with disabilities. The elements included in each MOU describe the referral processes between partners and funding of infrastructure costs for one-stop offices and the process for negotiation of the MOUs, as proposed under regulations §678.500 through §678.510 of WIOA.

All Workforce Solutions Offices and affiliate one-stop centers that are grant recipients adhere to the nondiscrimination, equal opportunity, and religious activities requirements, as proposed in the regulations implementing WIOA's nondiscrimination and equal opportunity provisions. TWC's offices and website are physically and programmatically accessible to individuals with disabilities participating in and/or benefiting from WIOA

programs and activities. Under the state's Methods of Administration (MOA), TWC guarantees that all recipients will comply, and are complying, with the nondiscrimination and equal opportunity requirements of WIOA and its implementing regulations.

Further strengthening the workforce delivery system, the 84th Texas Legislature, Regular Session (2015), passed legislation to transfer VR services currently housed within DARS to TWC by September 1, 2016. To this end, Texas, as appropriate, will seek any required federal approval for TWC to administer:

- the VR program for individuals with visual impairments;
- the VR program for individuals with other disabilities;
- the grant for Independent Living Services for older individuals who are blind; and
- the Criss Cole Rehabilitation Center.

Texas will also seek federal approval for the following:

- for TWC, beginning on September 1, 2016, to administer the program for vending facilities operated by blind persons, including the Business Enterprises Program under the Randolph-Sheppard Act; and
- to designate within TWC the combined state unit that is currently responsible for administering the state's VR program. The designated unit will be responsible for VR of individuals with disabilities and will have its own full-time director and a staff substantially employed full-time on rehabilitation work.

Legislation passed by the 84th Texas Legislature also requires TWC, not later than October 1, 2017, to integrate into a single VR program the VR program for individuals with visual impairments and the VR program for individuals with other disabilities. To facilitate this integration, TWC will:

- reorganize service delivery to achieve an integrated VR program to meet customers' individualized needs;
- develop a plan to support specialization of VR counselors in serving different customer populations;
- redesign performance measures;
- consolidate policies; and
- recommend the adoption of any necessary rules.

Services to Veterans

TEXAS VETERANS LEADERSHIP PROGRAM

The Texas Veterans Leadership Program (TVLP) is a TWC resource and referral network connecting returning veterans of Iraq and Afghanistan with the resources and tools they need to lead productive lives and enjoy the full benefits of the society they have willingly served. TVLP recruits veterans as Veterans Resource and Referral Specialists (VRRSs) to lead peer-to-peer outreach to veterans transitioning to civilian life. VRRSs target veterans who are unemployed or underemployed or struggling with lingering problems related to military service. Twenty VRRSs are stationed across 28 workforce areas to work alongside Workforce Solutions Office staff and local TVC staff. Two VRRSs work with the Army Career

and Alumni Program at Fort Bliss and Fort Hood, Texas. TVLP also collaborates with community-based organizations to meet the needs of veterans. Since July 2008, TVLP has contacted 19,374 veterans, of which services were given to 15,990 veterans of Operation Iraqi Freedom, Operation Enduring Freedom, and Operation New Dawn.

COLLEGE CREDIT FOR HEROES

CCH seeks to maximize college credits awarded to veterans and active duty service members for their military experience through streamlined degree paths and workforce certifications to expedite transition into the Texas workforce.

Since its initiation in 2011, CCH has undergone a phased-in expansion across the state. Fourteen Texas colleges and universities have established accelerated curricula for veterans and active duty service members in fields such as emergency medical services, surgical technology, respiratory therapy, nursing, information technology (IT), firefighting, advanced manufacturing, logistics, wind engineering, and oil field technology.

CCH also created an online application and database where veterans and active duty service members can receive an official evaluation of credit to be used at colleges and universities. As of October 1, 2015, the website has received over 90,000 visits and more than 10,000 requests for evaluations. Texas veterans and active duty service members have earned an average of 25 credit hours each through the CCH website.

Additionally, the program aims to expand the network of partnering colleges and universities through memoranda of understanding partnerships. The award of academic credit is contingent on approval from a receiving Texas college or university; therefore, increasing awareness among these institutions is essential. Institutions that become partners commit to review CCH evaluations and to maximize the award of college credit to veterans and active duty service members for their military experience and training.

To date, the network of CCH partner schools has grown to more than 42 institutions of higher education, with more looking to join.

Descriptions of all developed programs are available at http://www.twc.state.tx.us/svcs/vetsvcs/college-credit-heroes.html. Phase IV of the CCH program began August 11, 2015, with approval to set aside $1.4 million in federal WIOA funds. Phase IV expands the program by awarding funds for additional college partners to create accelerated curricula in new fields and replicate CCH programs at new schools.

HIRING RED,WHITE & YOU!

Hiring Red,White & You! (HRWY) is a statewide hiring event that brings employers and veterans and their spouses together. In the first three years, HRWY has connected more than 31,000 veterans with 4,700-plus employers. TWC sends out press releases, both in English and Spanish; TVC and TWC use social media to advertise the job fair; and flyers and messages are posted on each veteran job seeker's page in WorkInTexas.com. In addition, public service announcements featuring country singer Aaron Watson and former Texas Longhorn deep snapper and Green Beret Nate Boyer have been distributed to cable companies to air across the state.

VETERANS AND INDUSTRY PARTNERSHIP

TWC has dedicated training dollars from the state's Skills Development Fund to focus on training veterans in parts of the state where demand is high for occupations in the growth industries. Sixteen community colleges have received funds to partner with industries and Boards in identifying high-demand occupations and training veterans for those jobs. Priority is given to occupations within the following industries:

- Advanced Manufacturing
- Information Technology
- Petrochemical Training

TEXASWIDEOPENFORVETERANS.COM

TWC launched a veteran's online portal in December 2014 usingWIA Incentive Grant Award Funds. TexasWideOpenForVeterans.com (https://www.texaswideopenforveterans.com/twc-wofv/) provides information targeted to veterans about the state's economic, educational, and employment opportunities.

The site has received more than 25,320 visits from users across all 50 states and abroad. Of these visits, 36 percent were via a mobile device and 16 percent were returning visitors. Through the "Contact Us" form, TWC has assisted both veterans and employers by addressing their comments, questions, and concerns in an efficient and timely manner.

UNEMPLOYMENT COMPENSATION FOR EX-SERVICE MEMBERS (UCX)

The Unemployment Compensation for Ex-Service Members (UCX) program is designed to expedite the rapid reemployment of ex-military personnel. This program addresses the challenges of:

- active duty soldiers preparing to separate from the military;
- National Guard and Army Reserve service members returning from deployment; and
- soldiers who have already separated and are drawing UCX.

STATE OF TEXAS SOLDIER EMPLOYMENT INITIATIVE

The State of Texas Soldier Employment Initiative (STSEI) ended June 30, 2015. The four-state pilot program, established through a DOL grant, targeted service members who were preparing to separate or had recently separated from the U.S. Army, Army Reserve, or Army National Guard. In collaboration with the U.S. Army and DOLETA, STSEI provided enhanced employment services to members who were eligible for or receiving UI benefits through the UCX program.

TWC and TVC initially hired four STSEI staff members; each was assigned to serve members stationed at Fort Hood, Fort Bliss, Camp Mabry, and Ellington Field. In mid-2014, TVC reduced its STSEI staff. TVLP retained one staff member to serve Fort Bliss and one to serve Fort Hood. Together, the STSEI program reached out to approximately 23,000 Army UCX claimants. The average number of weeks that Army UCX claimants drew UCX benefits decreased from approximately 24 weeks in September 2012 to 15.8 weeks in April 2015. The eight-week decline represented a savings of close to $245 million.

STSEI also resulted in the *Texas Skills to Work* website https://texasskillstowork.com/. This online tool assists transitioning service members with translating their military experience into civilian terms. The tool can be used to improve a veteran's résumé as well as connect the veteran with civilian jobs that require military skill sets through the Conference Board's Help Wanted Online (HWOL) database. HWOL uses Internet "spidering" technology to aggregate job postings from corporate Internet sites and other job boards.

Migrant and Seasonal Farmworkers

Texas is one of the top five states with the highest population of year-round migrant and seasonal farmworkers (MSFWs). An assessment of agricultural employment in the state and a detailed description of services provided to agricultural employers and MSFWs may be found in the Wagner-Peyser Agricultural Outreach Plan (AOP).

Senior Community Service Employment Program

In Texas, the Office of the Governor has designated TWC as the state grantee for the Senior Community Service Employment Program (SCSEP) under Title V of the Older Americans Act of 1956 (42 USC 3056 et seq.). Texas' SCSEP Program Year 2016 Annual Grant Application is integrated with the SCSEP portion of this plan, in accordance with the optional programs and activities described in§103(a)(2) of WIOA.

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 needs and to achieve the goals of industry or sector partners in the state. The activities described shall conform to the statutory requirements of each program.

Texas businesses receive value-added assistance through an integrated workforce system. Businesses have access to pools of job seekers at all levels of education and experience, allowing potential employers to tailor new hires to the requirements of the job and build a better workforce. Close ties to the local labor market enable Boards to conduct outreach by working with businesses to provide opportunities for work experience and on-the-job training (OJT), and allow low-skilled workers to build skill sets relevant to the current market. Additionally, Boards are well positioned to work with other community partners, such as economic development organizations, to expand opportunities to all customers.

Dedicated Business Service Units (BSUs) provide businesses access to customized service options that address their specific business needs. BSUs offer a range of services designed to help employers with hiring and training needs to maximize their competitiveness, including:

- applicant recruitment, screening, and referral;
- listing and maintaining job orders through WorkInTexas.com;
- assistance with and participation in job fairs;
- information resources (e.g., labor market and business statistics, employment and labor law, UI);

- testing and prescreening job candidates;
- basic employment skills training and referral to education and training providers;
- customized training—including training through the state-funded Skills Development Fund—and OJT skills training;
- assistance with and information on the Work Opportunity Tax Credit; and
- rapid response and downsizing assistance in the event of closings or mass layoffs.

System-wide improvements continue, including expanding employers' access to grants under the Skills Development Fund. Programs backed by the fund build skill competencies to meet current and future demand in high-growth industry sectors. In crafting solutions for Texas employers, community-based organizations and technical colleges partner with TWC and local employers to provide job training when a specific need is identified. Training enables incumbent employees to advance their skills and/or creates new jobs with the partnering business. TWC works with the employer and training provider to ensure that the program meets specific performance measures and benefits both the employer and trainee. From the Skills Development Fund's inception in 1996 through 2014, grants have created or upgraded more than 316,000 jobs throughout Texas. The grants have assisted 4,074 employers with their customized training needs. The legislature allocated $48.5 million to continue the Skills Development Fund programs for the 2016-2017 biennium.

TWC closely measures performance to evaluate the Boards' effectiveness in meeting the needs of employers. These measures include:

- assisting employers in filling vacancies; and
- expediting the return of UI claimants to work, thereby protecting the state's unemployment trust fund as well as containing the UI tax rates of employers.

TWC's Office of the Commissioner Representing Employers also reaches out to businesses by sponsoring Texas Business Conferences, an annual series of 12 to 15 employer seminars around the state. The seminars present practical, up-to-date information for operating a successful business and managing employees. Topics include: Texas employment law and the basics of hiring, employee policy handbooks, handling unemployment claims, independent contractors, and federal and Texas wage and hour laws.

TWC's Skills for Small Business and Skills for Veterans initiatives provide further training opportunities for both employer and employee. Other activities include TWC's partnership with the Office of the Governor's Economic and Tourism division to host the Governor's Small Business Forums, and with the Texas A&M Engineering Extension Service (TEEX) to provide geographic mapping technology, SitesOnTexas.com. This website assists employers in planning for business expansion, job retention, and workforce training.

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS

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

The recent addition of the state's adult education and literacy (AEL) program to TWC allows the agency to examine new approaches to engage the state's education and training

providers, thereby encouraging adults in areas of literacy and numeracy while also preparing them for sustainable employment and financial self-sufficiency. As part of its partner engagement with educational institutions, TWC is involved in a unique collaboration with the Texas Education Agency (TEA) and the Texas Higher Education Coordinating Board (THECB) that assesses the curriculum requirements for public schools as well as legislation fostering early college high schools. TWC shares relevant labor market and career information to assist with decisions on directing resources toward a curriculum that will meet the occupational needs of the state. Support of early childhood education and professional development, along with English as a Second Language (ESL) and other AEL programs, are critical collaborations as well. The partnership between THECB and TWC through the CCH program has enabled veterans to receive college credit for the experience and training received while serving in the armed forces. Additionally, THECB and TWC are working together to implement the new Texas Fast Start program to promote rapid delivery of workforce education and development.

Other significant engagements with educational institutions include Texas State Technical College (TSTC), the Texas Engineering Extension Service (TEEX), and community colleges. TWC administers the state's Skills Development Fund and collaborates with Texas community and technical colleges and TEEX to support job-training programs among these training and education providers. Through this collaboration, employers that need to find skilled workers or upgrade the skills of their current workforce are provided customized training solutions. In partnership with more than 100 businesses, TWC has awarded grants that support the creation of some 5,800 new jobs and the elevation of skills of more than 10,000 incumbent workers through skills training. The Skills Development Fund has continued to expand and now supports certain dual-credit courses offered by school districts in partnership with public junior colleges, public state colleges, and/or public technical institutions, which accelerates a student's ability to obtain a degree.

On a local level, Boards annually publish in area newspapers an invitation to community colleges, area career and technical education schools, and other training providers, encouraging submission of applications for determination as an eligible training provider.

TWC must encourage the state's education and training providers to identify and leverage deliverable services beyond those provided solely through the workforce system's funding. Among the practices, local adult education programs form partnerships joining educational, workforce development, and other human services agencies to collaboratively develop AEL services.

For example, flexibility with federal funding may apply to such initiatives as improving access to postsecondary credentials. TWC strongly supports partnerships that increase opportunities for adult learners to transition to postsecondary credentials, including registered apprenticeship certification and industry-recognized certificates and licenses and certifications that are portable and stackable. Current initiatives strategically position the statewide system for innovation in new directions related to full system integration and postsecondary education outcomes, as measured by high school equivalency, college and career readiness, enrollment in nonremedial, for-credit courses in postsecondary educational institutions, and occupational and industry skill standards and certification widely used and recognized by business and industry. These initiatives include:

- Integration of services to support alignment of AEL activities with other core programs in the workforce system and linkages to employers and community-based organizations through workforce events, ongoing technical assistance efforts, and sharing of best practices developed across the state;
- Continued development of content and models for integrated education and training career pathways, and other postsecondary transition models and workplace projects, including apprenticeships with employers; and
- Building on past success through the Accelerate Texas Model. Started by THECB in 2009 and coopted in 2014 by TWC, Accelerate Texas is designed to build capacity and expand deployment of successful career pathway programs that lead to increased employment, higher education transition, and skill gains and secondary completion through demonstrated approaches that integrate system services and leverage community partnerships.

F. PARTNER ENGAGEMENT WITH OTHER EDUCATION AND TRAINING PROVIDERS.

Describe how the State's Strategies will engage the State's other education and training providers, including providers on the state's eligible training provider list, as partners in the workforce development system to create a job-driven education and training system.

See III.A.2.E., Partner Engagement with Educational Institutions

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).

See III.A.2.E., Partner Engagement with Educational Institutions

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.

TWC must encourage the state's education and training providers to identify and leverage deliverable services beyond those provided solely through the workforce system's funding. Among the practices, local adult education programs form partnerships joining educational, workforce development, and other human services agencies to collaboratively develop AEL services.

For example, flexibility with federal funding may apply to such initiatives as improving access to postsecondary credentials. TWC strongly supports partnerships that increase opportunities for adult learners to transition to postsecondary credentials, including registered apprenticeship certification and industry-recognized certificates and licenses and certifications that are portable and stackable. Current initiatives strategically position the statewide system for innovation in new directions related to full system integration and postsecondary education outcomes, as measured by high school equivalency, college and

career readiness, enrollment in nonremedial, for-credit courses in postsecondary educational institutions, and occupational and industry skill standards and certification widely used and recognized by business and industry. These initiatives include:

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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.

TWC's market-driven approach engages all potential customers, including economic development entities. TWC's Office of Employer Initiatives (OEI) and its network of regional Texas Workforce Solutions partners hold listening events throughout Texas to hear about the good work that is being done and the workforces challenges that each region faces. Through these meetings, new initiatives are launched and new industry-aligned strategies are formulated. OEI also partners with the TEA and THECB in regional meetings with employers, higher education and public education leaders, economic development and local workforce professionals, and other key community leaders to discuss regional economic priorities, employer workforce needs, and the career planning and preparation needed for Texas students to be ready for success in college or a career.

Additionally, TWC helps coordinate presentations and resources for the Governor's Small Business Forums held throughout the state by the Economic Development and Tourism Division of the Governor's Office. The forums provide businesses with information regarding available governmental services, workforce training programs, contracting opportunities, best practices and methodologies, exporting products and services, and any other areas relevant to small business inception and growth. OEI is primarily funded through general revenue, as part of the executive budget.

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.).

WIOA emphasizes the importance of labor market and system performance information in driving strategic and operational decision-making in the workforce system. TWC has long recognized the importance of using data to drive decision-making and has made availability and evaluation of data a key part of its strategic development and oversight processes and consumer education efforts.

State Operating Systems

State operating systems are primarily divided into three categories:

- LMCI Exploration
- Participant Eligibility, Service Tracking, and Case Management
- System Oversight

Labor Market Information and Career Exploration Systems

TWC's LMCI department provides information about general and specific trends within the labor market in Texas regarding different industries, occupations, employment levels, and wages. This information is critical to the strategic planning processes of TWC and the local Boards and to improving the way Texans make career and educational decisions by providing useful and reliable information about careers, educational training options, and jobs. The department's products range from online career information to a variety of specialized economic development and regional planning tools.

The Texas Rapid Access to Career and Economic Resources (TRACER) website provides employment statistics to assist job seekers and employers in making informed decisions. TRACER is based on a standardized structure established by America's Labor Market Information System. TWC's LMCI department deployed TRACER2, which has modules that can be tailored for individual users and greater ease of use. LMCI data is available at http://www.tracer2.com.

The Wage Information Network (WIN) system is the online portal for all occupational employment statistics wage data that TWC publishes. WIN allows users to examine wage data for an area—or within an industry in an area—and to compare that wage with other areas of the state. More importantly, the data user—not the data—drives the system.

TWC also provides the LMCI SearchPage, which is designed to expand the types and sources of data available. The site has every published industry level for each metropolitan statistical area of the state and offers a range of data customized to specific areas.

Understanding the area's labor market involves many facets; however, the two most significant are labor market data and local employer input. Knowledge of the local labor market is so important that evidence of diligent labor market, economic, demographic,

placement rate, and training program data analysis is a required part of a Board's plan. To assist each Board in creating a customized labor market plan, LMCI developed an Internet-based analysis tool. The Standard Occupational Components for Research and Analysis of Trends in Employment System (SOCRATES) at http://socrates.cdr.state.tx.us and other robust tools made available by LMCI were designed to assist local planners in gaining insight into their labor market structure, characteristics, and patterns. LMCI provides online tools, technical assistance documentation, and staff coaching to mentor Board staff in the organized process, analytical tools, standard targeting methodology, and detailed labor market data necessary to draft a labor market plan.

Changes in the education system brought about by legislation provide TWC the opportunity to help students transition from the classroom to career readiness. TWC supports school counselors, school districts, students, and parents by providing LMCI to assist them with student career-planning and preparation. Additionally, the agency provides information and supports efforts to prepare students for occupational training at the presecondary, secondary, postsecondary, and college and university levels.

A few of the nationally recognized consumer education and career pathway exploration tools offered by TWC include the following:

- Reality Check - TexasRealityCheck.com (http://www.texasrealitycheck.com) is one of the more frequently used resources in the LMCI tool box and also features a widely used iPhone application. The website allows students to make lifestyle choices, create a budget, and then view the occupations and preferred education levels that support those choices.
- Texas Career Alternatives Resource Evaluation System (Texas CARES) - Texas CARES at www.texascaresonline.com is a multimedia career information system designed for individuals to explore different careers and related educational opportunities in Texas and around the world.
- Texas Consumer Resource on Education and Workforce Statistics (Texas CREWS) - Texas CREWS at http://www.txcrews.org is a dashboard tool that provides information about Texas' public two-year and four-year postsecondary institutions; evaluates programs/institutions on the basis of resulting wages and student loan levels; and enables parents and students to make informed decisions about college and thereby obtain the best return on their educational investment.

The Texas CREWS platform is similar to what TWC will use to capture and provide access to eligible training provider data, which is needed to deepen consumer education, as required by WIOA.

Participant Eligibility, Service Tracking, and Case Management Systems

TWC provides the main automated systems used by the local Boards and other grantees for job matching, data collection, and case management, including adult education and vocational rehabilitation, as well as child care assistance. In addition, the Boards and other grantees use a financial reporting system developed by TWC.

WorkInTexas.com - WorkInTexas.com is Texas' Labor Exchange System, as mandated by the Wagner-Peyser Act, and operated in cooperative effort with JobCentral, the National Labor

Exchange system. WorkInTexas.com is a comprehensive online job search resource and job matching system developed and maintained by TWC, and provides:

- extensive job matching options based on skills and experience;
- links to labor market and career development information; and
- free, 24-hour-a-day access.

Employers can post jobs, search résumés, recruit candidates, get labor market information, and receive a variety of other services available through a network of statewide Workforce Solutions Offices. Individuals seeking a new job, different job, or an additional job can post their résumé, search job listings (including Texas state agency jobs), obtain employer contact information to apply for jobs, get information about the job market, and receive a variety of other services also available through Workforce Solutions Offices.

The Workforce Information System of Texas (TWIST) - TWIST is the integrated intake, eligibility, case management, and reporting system for employment and training services. It was designed as a central repository for customer information. TWIST ultimately decreases duplication within and across the Texas workforce system while streamlining the provision of services to customers. It enables Workforce Solutions Office staff to enter intake information for customers only once for multiple employment and training programs and to retrieve it statewide. TWIST also includes interfaces with other automated systems—WorkInTexas.com, the UI benefits system, and the Texas Health and Human Services Commission's system.

Child Care Attendance Automation - Child Care Attendance Automation (CCAA) allows parents to record attendance using a swipe card at a point-of-service device located at the authorized child care facility. Parents also can use an interactive voice response system using the authorized child care provider's phone. Attendance recorded through CCAA is transferred to TWIST on a weekly basis, and TWIST is used to process payments to providers based on the CCAA attendance records.

Texas Educating Adults Management System (TEAMS) - TEAMS is Texas' state-of-the-art, web-enabled system that maintains student-level data, including demographic, assessment, and outcome data, as well as class, site, program, and provider information. TEAMS users can analyze class, site, or program information through the use of standard reports generated at the user level. TEAMS provides a wide range of information about adult education, including snapshots of student and program performance, personnel qualifications, and staff development activities.

ReHabWorks - ReHabWorks is a web-based case management system. It is the portal through which field staff enters information from and about the consumer to manage the VR process. Functionalities include collecting required information for preparing state/federal reports, guiding processes and forms, and reporting requirements.

Cash Draw and Expenditure Reporting - TWC's online Cash Draw and Expenditure Reporting (CDER) system is a web application used by Boards to draw funds from their program allocations. All financial transactions are handled through this online system, and Boards are no longer required to submit paper documents or Excel spreadsheets. CDER has significantly decreased manual processing and greatly improved the reporting of data to all parties.

Quarterly Wage Records - TWC makes extensive use of quarterly wage records, both for required and ad hoc reporting. TWC uses Texas wage records and those obtained from other states through the Wage Record Interchange System (WRIS) for required WIOA, Wagner-Peyser, and Trade Adjustment Assistance (TAA) reporting. A fuller discussion of the use of quarterly wage records is contained in the Program Data section of this plan.

System Oversight Systems

TWC provides access to performance and management information reports to Boards and grantees. At this time, TWC does not have a single consolidated data warehouse and reporting system. Instead, TWC has a variety of systems that provide summary and customer-specific data to support management and oversight functions. Some of these systems are part of the underlying case management systems (TEAMS and WorkInTexas.com, for example, each have a set of reports that can be run). TWC also has several systems created exclusively for reporting purposes that allow standard reports and ad hoc queries to be run. Because Boards and other grantees are generally able to access these systems, TWC is able to ensure a high degree of transparency in the Texas workforce system. (The key limit to the transparency is when a customer is included in a measure solely due to wage or employment records obtained through the Wage Record Interchange System (WRIS) or Federal Employment Data Exchange System (FEDES). In such a circumstance, the system does not provide the full customer-level detail that it otherwise does.)

The systems can produce data on hundreds of subpopulations for most performance measures, which allows for a deeply granular evaluation of performance and management information. This level of detail also allows TWC to perform highly complex evaluations of performance data for forecasting, target setting, and general determinations of effectiveness.

As effective as TWC's existing workforce program reporting system has been, it was developed in 2005. At the time, it was one of the most advanced reporting systems of its kind in the nation. However, TWC has outgrown that system and it is clear that if the final WIOA performance and reporting requirements are substantially similar to those proposed, this system will not allow TWC to meet WIOA's requirements. TWC sought a Workforce Innovation Fund grant to develop an advanced data warehouse and analytics system to support strategic decision making, system oversight, and business insight generation, but this grant was not approved.

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

TWC provides Boards, other grantees, and state staff with guidance regarding data collection and reporting. These include both common and program-specific guides that outline data entry deadlines and requirements for recording data on Eligibility Determination, Service Dates/Details, Outcome Tracking (for those elements not tied to wage records), and Case Management. TWC's Workforce Development Division provides technical assistance to Boards and grantees to help ensure that they timely and accurately enter data as required into the appropriate systems. TWC's Subrecipient Monitoring Department conducts data validation and other Board and grantee reviews to support system and data integrity.

TWC's Division of Operational Insight (DOI) is responsible for producing, analyzing, and reporting performance. DOI provides timely, accurate, and understandable information and analyses relevant to the performance, accountability, and integrity of the Texas workforce system. DOI's reporting ensures that TWC and Board and grantee management have the information necessary to make policy decisions that will help the system meet or exceed performance expectations, thus offering the opportunity for Texas businesses, residents, and communities to achieve and sustain economic prosperity.

Like most WIOA performance measures, most of the existing Common Measures were based on quarterly Exiter cohorts and quarterly wage record filing. Despite this, TWC found that quarterly performance data can change on a monthly basis. As a result, DOI has produced performance data on a monthly basis for the governor's office, Texas legislature, agency management, Boards, and other grantees. In addition, TWC found that the "reporting lag" provided for in federal guidance is far more than that needed. This is likely due to the fact that the federal reporting schedules were developed based on UI wage reporting in the 1990s, which still included a great deal of paper filing by employers. Since that time, Texas has moved to 100 percent electronic filing of wage records. Where it once took nine months to have 99 percent of UI wage records loaded in the UI tax system, it now takes less than three months. Therefore, performance for a given quarter of Exiters can be meaningfully run much earlier than the federal deadlines would provide, and TWC does so in order to improve TWC's ability to identify and respond to potential performance issues more quickly.

In addition to producing performance data each month, DOI coordinates with TWC's operational areas to develop "Explanations of Variance" when performance is not between 95 percent and 105 percent of target (whether high or low). TWC also holds open, posted meetings each quarter with the Commission to discuss its performance. These meetings are broadcast on the Internet to allow Boards, grantees, other stakeholders, and the public to listen to the discussions and understand the system's current areas of strength and weakness, as well as proposals to support continuous improvement.

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

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

State Policies

The state makes information on state-imposed requirements—such as guidance for the statewide workforce development system, including policy for the use of state funds for workforce investment activities—available to the public.

All workforce policy that supports the implementation and continuous provision of WIOA-funded services is approved by TWC's governing body, consisting of three Governor-appointed Commissioners, before being made available to the public.

The following materials are readily accessible through the TWC website:

- The *WIOA Guidelines for Adults, Dislocated Workers, and Youth* provides Boards with guidance on implementing WIOA including establishing WIOA Title I program eligibility for adults, dislocated workers, and youth. The WIOA Guidelines describes each WIOA job seeker population and provides information and procedures for documenting and verifying eligibility for each. http://www.twc.state.tx.us/files/jobseekers/wioa-guidelines-twc.pdf
- TWC rules are reviewed by TWC's three commissioners, and must be approved before rules and past rule amendments, as codified in the Texas Administrative Code, Title 40, Part 20, are made available to the public via the "Texas Workforce Commission Rules" page on the agency's website. http://www.twc.state.tx.us/partners/texas-workforce-commission-rules
- All operational guidance and active workforce policy is provided to local Boards in the form of Workforce Development (WD) Letters, Adult Education and Literacy (AEL) Letters, Technical Assistance (TA) Bulletins, and comprehensive guides. These guidance documents are based on Commission-approved policies. http://www.twc.state.tx.us/partners/workforce-policy-guidance
- Reports, plans, and publications: Agency strategic plans and annual reports, publications for employers and job seekers, and program plans and reports. http://www.twc.state.tx.us/partners/reports-plans-publications

The following vocational rehabilitation materials are readily accessible through the Texas Department of Assistive and Rehabilitative Services (DARS) and HHSC websites:

- New or modified policies and procedures communicated through policy circulars and bulletinshttp://www.hhsc.state.tx.us/news/CircularsBulletins.shtml
- Current HHSC rules, as codified in the Texas Administrative Code, Title 1, Part 15 http://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=3&ti=1&pt=15
- Reports and plans of DARS' programs http://www.dars.state.tx.us/reports/index.shtml

Core Program Activities to Implement the State's Strategy

The following activities support WIOA core programs and align with the state's strategies, as previously described.

TWC administrates the development and integration of workforce services in tandem with the Board's oversight and planning efforts. Service delivery is executed through Texas Workforce Solutions, which may contract with one-stop providers to operate a variety of program components. This network gives customers local access to workforce solutions and statewide services at approximately 200 Workforce Solutions Offices, four UI Tele-Centers, and numerous partner locations.

WIOA has reinforced Texas' progress toward integrating services for customers. WIOA §193(a)(3) provides that Boards' contracted workforce service providers and community partners are defined under prior consistent state law.

Sections 302.021 and 302.062 of the Texas Labor Code set forth the job training, employment, and employment-related educational programs and functions consolidated under the authority of TWC. In Texas, prior consistent state law defines the Boards'

responsibility to develop, implement, and modify a plan for convening all relevant programs, identified as one-stop required-partner programs, including:

- Workforce Innovation and Opportunity Act (WIOA, formerly Workforce Investment Act (WIA))
- Wagner-Peyser Employment Service (ES)
- Unemployment Insurance (UI) Benefits Information
- Choices, the Temporary Assistance for Needy Families (TANF) employment and training program
- Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T)
- Subsidized child care
- Trade Adjustment Assistance (TAA)
- Adult Education and Literacy (AEL) programs

The 84th Texas Legislature, Regular Session (2015), amended the Texas Labor Code by adding Title 4, Subtitle 4, which transfers the following programs from DARS to TWC on September 1, 2016:

- VR (WIOA, Title IV) programs
- Business Enterprises of Texas
- Grant for Independent Living Services for Older Individuals Who are Blind
- The Criss Cole Rehabilitation Center

Prior consistent state law further defines the following as required one-stop partner programs. Other than UI compensation, which is administered by TWC, the programs are not under the direct oversight of the Boards; therefore, Boards are required to establish memoranda of understanding (MOUs) with:

- Adult Education and Literacy (WIOA, Title II);
- Apprenticeship programs;
- National and Community Services Act Program;
- Non-Certificate Postsecondary Career and Technology Training programs; and
- Senior Community Service Employment Program.

TWC also recommends that Boards enter into MOUs with the following optional partner activities:

- Career and technical education programs authorized under the Carl D. Perkins Act of 2006
- Job counseling, training, and placement services for veterans, 38 USC 41
- Education and vocational training program through Job Corps administered by DOL
- Native American programs authorized under Title I of WIOA
- HUB-administered employment and training programs
- Employment and training activities carried out under the Community Services Block Grant Act
- Reintegration of offenders programs authorized under the Second Chance Act, 2007
- Migrant and Seasonal Farmworker programs authorized under Title I of WIOA

Additionally, Boards are encouraged to continually expand and enhance their network by forming partnerships outside of the Workforce Solutions Offices. Some agencies and services with which Boards establish additional cooperative relationships include the following:

- Local boards of education
- Local-level vocational education agencies
- Community-based Organizations (CBOs)
- Faith-based Organizations (FBOs)
- Texas Department of Housing and Community Affairs (TDHCA)
- Other appropriate training and employment agencies and services to expand local presence

TWC also requires Boards to jointly develop and adopt an MOU with HHSC. Although HHSC is a federal optional one-stop partner, the MOU fulfills state law regarding the coordinated interagency case management of recipients of financial assistance in employment and training activities and support services (Texas Human Resources Code §31.0128), and reflects Texas state law mandating their integration within TWC.

Pay-for-Performance Contract Strategy

TWC and Boards will maintain, where applicable, performance-based contracts. As in the past, however, TWC and Boards will consider developing, with stakeholder input, a WIOA pay-for-performance contracting strategy applicable to Title I programs, as defined in WIOA §3(47).

The development of a performance-based contract is contingent on the pay-for-performance contract strategy, which establishes specific benchmarks that must be achieved in order for the contractor to receive payment. WIOA calls for the benchmarks to be tied to the prime indicators of performance and adjustments thereof related to economic conditions and the population demographics.

TWC intends for pay-for-performance contract strategies to be implemented in accordance with further guidance regarding WIOA performance requirements. Additionally, DOL's guidance is sought for both state and local areas in developing the broader pay-for-performance contract strategy, including the scope and minimum requirements of the required feasibility study, as presented in the Notice of Proposed Rule Making (NPRM) (document no. 2015-05530).

TWC will continue to allow Boards to use performance-based contracts that are not WIOA pay-for-performance contracts. Furthermore, TWC will maintain the latitude provided for in WIOA to consider the development of a pay-for-performance contract strategy as guidance is issued.

Determination of Funds Provided for Infrastructure Costs

TWC will issue its policy on the requirements for funding infrastructure costs in a WD Letter. In part, the WD Letter will state that Boards, with the agreement of CEO's, must develop and enter into memoranda of understanding (MOUs) with statutorily required one-stop partners for operation and funding of a one-stop delivery system in the local area.

Boards may also enter into MOUs with other optional partners, as described by WIOA. Among several required provisions, the MOU must include a final plan, or an interim plan if needed, on how the infrastructure costs of the one-stop centers will be funded.

The WD Letter also will state that if a one-stop partner appeals to the state regarding infrastructure costs and the appeal results in a change to the one-stop partner's infrastructure cost contributions, the MOU must be updated to reflect the final one-stop partner infrastructure cost contributions.

The appeals process established by the Texas governor specifies that no later than August 1, 2016 (and every succeeding program year, as applicable), a one-stop partner may appeal a governor's determination regarding the one-stop partner's portion of funds for one-stop infrastructure costs.

- The appeal must be submitted to TWIC in writing or electronically on the TWIC website (or TWC website). The appeal must be signed/submitted by the chief executive officer of the one-stop partner submitting the appeal. The appeal must specify the circumstances and details of the appeal.
- The appeal may be made only on the ground that the governor's determination is inconsistent with proportionate share requirements in NPRM §678.735(a), the cost contribution limitations in §678.735(b), or the cost contribution caps in §678.735(c).

TWIC will consider and rule on the appeal in writing not later than September 30, 2016 (and every succeeding program year, as applicable).

3. STATE PROGRAM AND STATE BOARD OVERVIEW

A. STATE AGENCY ORGANIZATION

Describe the organization and delivery systems at the State and local levels for the programs covered in the plan, including the organizational structure. Include an organizational chart.

The Commission is the governing body of the Texas Workforce Commission (TWC), comprising three governor-appointed Commissioners, to represent employers, labor, and the public.

Commission Member	Representing	Term Expires
Ruth R. Hughs - Chair	Employers	2021
Julian Alvarez	Labor	2023
Vacant	Public	N/A

The Commission holds meetings that are open to the public and available by audio webcast, to adopt policies and rules for the services that TWC oversees and delivers, and to make

final decisions on unemployment compensation disputes. The meeting agendas, materials, and minutes are posted on the TWC website for public review and comment.

TWC is presided over by the Commission and administered by the executive director to operate an integrated workforce development system and administer unemployment benefits in Texas.

TWC itself comprises the following divisions: External Relations, Regulatory Integrity, Information Technology, Unemployment Insurance and Regulation, Workforce Development, Civil Rights, and Operational Insight. These divisions, along with the Office of Employer Initiatives, work together in a seamless integrated fashion that encourages open communication and sharing of information.

External Relations Division

TWC's External Relations Division includes Communications, Governmental Relations, Labor Market and Career Information (LMCI), and Conference Planning and Media Services. External Relations serves as the primary point of contact with legislative offices as well as the media. Additionally, the division provides planning logistics and implementation support to TWC for conferences, seminars, events, and multimedia services statewide.

LMCI improves the way Texans make career and educational decisions by providing useful and reliable information about careers, educational training options, and jobs. LMCI's products range from TexasRealityCheck.com, a website that allows students to make lifestyle choices, create a budget, and view the occupations and preferred education levels that support those choices, to a variety of specialized economic development and regional planning tools.

Regulatory Integrity Division

The Regulatory Integrity Division supports TWC operations in its administration and enforcement of all regulatory statutes within its jurisdiction, including assisting other divisions in resolving regulatory issues; instituting legal actions, as necessary; enforcing provisions of the Texas Labor Code, Texas Education Code, and other applicable statutes through the appropriate statutory remedies; preventing, detecting, and eliminating program fraud, waste, and abuse; and assisting all TWC employees with ethics questions. A division priority is the prevention, detection, and elimination of fraud and abuse in the unemployment insurance (UI) program.

Information Technology Division

The Information Technology Division develops applications and information systems that support TWC's critical business operations. Staff works closely with TWC business areas to create and maintain automated applications that best serve their evolving needs. The division also supports the infrastructure, either directly or through contract, required to support TWC systems, including data center operations, networks, personal computers, e-mail, desktop software tools, and print and mail. It is also responsible for information security and the planning, maintenance, and testing of an ongoing disaster recovery program.

Unemployment Insurance and Regulation Division

The Unemployment Insurance and Regulation Division includes UI support services, call center operations, and appellate services. The TWC Tax Department and Unemployment Benefits Services are managed by this division. The division assists employers and claimants with eligibility requirements, benefit extensions and deadlines, and appeal procedures. Unemployment Benefits Services, funded through employer taxes, provides temporary income to workers who have lost their jobs through no fault of their own. TWC collects unemployment taxes from liable employers and pays unemployment benefits to qualified claimants. TWC has a formal appeal procedure to address claim issues and employers' tax liability, contribution, or reimbursement disputes.

Workforce Solutions Division

The Workforce Development Division provides oversight, coordination, guidance, planning, technical assistance, and implementation of employment and training activities, with a focus on meeting the needs of employers throughout Texas. The division currently administers programs such as WIOA Adult, Dislocated Worker, and Youth; Adult Education and Literacy; Vocational Rehabilitation; Wagner-Peyser Employment Service; Choices (Temporary Assistance for Needy Families Employment and Training (TANF E&T)); Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T); Apprenticeship; Skills Development Fund; Texas Veterans Leadership Program; and Career Schools and Colleges.

Civil Rights Division

The Civil Rights Division provides investigations of employment or housing discrimination complaints, training and technical assistance to public and private entities, personnel policy reviews of state agencies and institutions of higher education, and reviews of initial testing conducted by fire departments. The division enforces the Texas Commission on Human Rights Act, and enters into an Annual Worksharing agreement and contract with the U.S. Equal Employment Opportunity Commission (EEOC). EEOC reviews cases for compliance with federal equal employment opportunity statutes. The division also enforces the Texas Fair Housing Act. The U.S. Department of Housing and Urban Development enters into a contract with the division and reviews the housing discrimination complaints.

TWC's Civil Rights Division was formerly governed by its own set of commissioners. The Commission on Human Rights established policies for the division and supervised the director in administering the activities of the division. The Commission on Human Rights has been the state authority established as a fair employment practice agency. The 2015 Texas Legislature streamlined oversight of the division by eliminating its separate seven-member board. Going forward, the division will answer to TWC's Commission, as do all other divisions.

Division of Operational Insight

The Division of Operational Insight (DOI) provides performance data for TWC and the Boards, including measures reported federally and to the legislature and governor's office, as well as other measures developed by TWC for management purposes.

To these ends, DOI is charged with developing and defining data systems that supply the information necessary to administer a workforce system that supports the opportunity to achieve and sustain economic prosperity. Additionally, the division ensures data integrity,

enabling the insight to make data-driven decisions and to provide appropriate oversight of the Boards.

Office of Employer Initiatives

The Office of Employer Initiatives is responsible for providing leadership and direction within the Texas workforce system to engage employers, business organizations, educational institutions, and economic developers in the ongoing development of a customer-focused, market-driven workforce system. The office develops cluster-based strategies and industry partnerships, and implements innovative industry-led programs for business recruitment, retention, and growth. This office receives no funding under WIOA.

An organizational chart follows.

https://twc.texas.gov/files/agency/agency-organizational-chart-twc.pdf

Texas Workforce Commission Organizational Chart, as of Augst 2018:

Our mission is to promote and support an effective workforce system that offers employers, individuals and communities the opportunity to achieve and sustain economic prosperity.

Commissioners - Chair, Representing Employers, Ruth Ruggero Hughs; Commissioner Representing Labor, Julian Alvarez; Commissioner Representing the Public, Vacant

I. Internal Audit, Ashley Sagebiel (also indirectly reports to the Executive Director)

II. Executive Director, Larry Temple

A. Deputy Executive Director, Ed Serna

1. Business Transformation, Alfredo Mycue

2. Business Operations, Glenn Neal

a. Procurement and Contract Services

b. Human Resources

c. Training and Development

d. Infrastructure Services

e. Regional Support and Risk Management

f. Document Services

3. Chief Financial Officer, Randy Townsend

a. Accounting and Financial Reporting Services

b. Budget and Financial Systems Support

c. Payables and Payroll

d. Revenue, Travel and Trust Management

4. Information Technology, Lisa Richardson

a. Deputy Director, IT Infrastructure and Support

i. IT Infrastructure Services

ii. IT Customer Services

b. Deputy Director, IT Planning and Development

i. Applications Development and Maintenance

ii. Technology Business Services

B. General Counsel, Les Trobman (also indirectly reports to the Commissioners)

C. Employer Initiatives, Aaron Demerson

D. Operational Insights, Adam Leonard

E. Deputy Director, Workforce Solutions, Vacant

1. Workforce Grants and Contracts, Jennifer Troke

3. Vocational Rehabilitation Services, Cheryl Fuller

a. Program Policy and Support

b. Program Operations

c. Business Enterprises of Texas

d. Field Services Delivery

4. Workforce Programs, Courtney Arbour

a. Board Administered Programs

b. State Operated Programs

c. Workforce and Board Support

F. Civil Rights, Lowell Keig

1. Employment Investigations/ADR

2. Housing Investigations/ADR

G. Regulatory Integrity Division, Paul Carmona

1. Internal Investigations

2. Subrecipient Monitoring, Statistical Sampling and VR Contract Oversight

3. Program Investigations, Fraud and Collections

4. State EO Officer (also indirectly reports to the Executive Director)

H. Unemployment Insurance and Regulation, LaSha Lenzy

1. Customer Service and UI Operations

a. UI Operations and Customer Support

b. Appeals

c. Commission Appeals

d. Special Hearings

e. Tax

I. External Relations, Tom McCarty

1. Communications

2. Governmental Relations

3. Labor Market and Career Information

4. Conference Planning and Media Services

5. Customer Relations

6. Strategic Outreach

B. STATE BOARD

Provide a description of the State Board, including—

Description included in the following elements.

I. MEMBERSHIP ROSTER

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

Membership

- As previously referenced, TWIC is composed of 19 members. The governor appoints 14 members representing business, organized labor, education, and community-based organizations. The remaining members are ex officio representatives from TWIC's five-member state agencies. Appointed members serve six-year staggered terms, of which one-third of the members' terms expire each odd-numbered year. Ex officio members serve as long as they are the presiding officer of the member agency they represent. Texas Government Code, §2308.052 specifies TWIC's membership composition as follows: Five members appointed by the governor representing business and industry, including business members serving on local workforce boards
- Five members appointed by the governor representing organized labor, based on recommendations made by recognized labor organizations
- Three members appointed by the governor representing education, including local public education, public postsecondary education, and vocational education
- One member appointed by the governor representing community-based organizations, and who is not a provider of services
- Five ex officio members representing statutory agency members:
    - Director of the Economic Development and Tourism Division in the Office of the Governor
    - Commissioner of the Texas Education Agency

- Executive Commissioner of the Texas Health and Human Services Commission
- Commissioner of the Texas Higher Education Coordinating Board
- Executive director of the Texas Workforce Commission

Current TWIC members, by member category, include:

Business and Industry

- Wes Jurey, Chair (Arlington)
- Mark Dunn (Lufkin)
- Thomas Halbouty (Southlake)
- Matthew Maxfield (Harker Heights)
- Joyce Delores Taylor (Houston)

Organized Labor

- Mark Barberena (Fort Worth)
- Robert Cross (Houston)
- Richard Hatfield (Austin)
- Robert Hawkins (Bellmead)
- Paul Jones (Austin)

Education

- Carmen Olivas Graham (El Paso)
- Larry Jeffus (Garland)
- Richard Rhodes (Austin)

Community-Based Organization

- Sharla Hotchkiss, Vice Chair (Midland)

State Agency Ex Officio

- Bryan Daniel (Office of the Governor, Economic Development and Tourism)
- Raymund Paredes (Texas Higher Education Coordinating Board)
- Larry E. Temple (Texas Workforce Commission)
- Chris Traylor (Texas Health and Human Services Commission)
- Michael Williams (Texas Education Agency)

A current membership roster may be found on TWIC's website at http://gov.texas.gov/twic.

II. BOARD ACTIVITIES

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

The Texas Workforce Investment Council (TWIC) was created in 1993 by the 73rd Texas Legislature. TWIC's purpose is to promote the development of a highly-skilled and well-educated workforce for the state of Texas, and to assist the governor and the legislature with strategic planning for and evaluation of the Texas workforce system.

The scope of TWIC's work is "workforce development," which is defined in TWIC's state statutes as "workforce education and workforce training and services." Workforce education includes articulated career path programs and the constituent courses of those programs that lead to a sub-baccalaureate license, credential, certificate, or degree.

State statute assigns TWIC four primary functions in the Texas workforce system: 1) strategic planning, 2) evaluation and performance measurement, 3) research and continuous improvement, and 4) review of state and local workforce plans in order to recommend final approval by the governor.

TWIC also serves as the state workforce investment board (state board) as required under federal workforce law. As the state board, TWIC operated under the Workforce Investment Act of 1998 (WIA) (Public Law 105-220) since Texas' early implementation of the act in 1999. On July 1, 2015, the Workforce Innovation and Opportunity Act of 2014 (WIOA) (Public Law 113-128) became effective, thereby establishing new federal workforce law and repealing WIA. TWIC continues to serve as the state board under WIOA.

In some states, prior consistent state law has determined that the state board will be largely responsible for system strategic planning and evaluation, and that the state workforce agency will be responsible for program administration.

Because of the significant workforce system reform initiated by the Texas legislature in 1993 and 1995, WIOA contains provisions that allow Texas to retain—or grandfather—major elements of its workforce system that are consistent with WIOA, including TWIC's composition and roles. As a result, the duties assigned to the state board under WIOA are implemented in a manner that is consistent with TWIC's role under state legislation enacted before WIOA. Accordingly, TWIC does not operate programs nor does it directly manage the flow of state and federal funding to the system's state agencies. Rather, TWIC's focus is strategic, and its functions are guided by the duties and responsibilities established for TWIC by the Texas legislature.

As the state board, federal agencies periodically engage TWIC in its system oversight role to participate in program reviews. For example, in the past TWIC has participated in program reviews and site visits conducted by the U.S. Department of Labor (DOL) Region IV Office, DOL Office of Inspector General, Rehabilitation Services Administration, U.S. Department of Education Office of Adult and Vocational Education, and the Organization for Economic Cooperation and Development.

One of TWIC's key responsibilities is the development of an overarching strategic plan for the Texas workforce system. The state's workforce system is composed of a number of programs, services, and initiatives administrated by agencies and Boards, as well as independent school districts, community and technical colleges, and local adult education providers. System partners are responsible for the delivery of over 19 workforce education and training programs and related services, as well as education programs that support career preparation and advancement.

Texas workforce system partners include the following:

- Governor's Office of Economic Development and Tourism
- Texas Association of Workforce Boards
- Texas Department of Criminal Justice and its Windham School District
- Texas Education Agency
- Texas Health and Human Services Commission and its Department of Assistive and Rehabilitative Services
- Texas Higher Education Coordinating Board
- Texas Juvenile Justice Department
- Texas Veterans Commission
- Texas Workforce Commission

While the system strategic plan is intended to guide system partners in implementing workforce programs, services, and initiatives, it is intended to not duplicate partner agencies' strategic plans. Rather, the system plan is strategic in nature and is focused on the system, and is designed to focus on the most critical outcomes that will make significant progress in achieving the system vision.

Strategic Planning

Section 2308.104 of the Texas Government Code mandates TWIC to develop a "single strategic plan that establishes the framework for budgeting and operation of the workforce development system." The plan must include goals, objectives, and performance measures for the workforce system that involve programs of all state agencies that administer workforce programs. As such, the plan acts out the mission and vision for the Texas workforce system.

State statute also directs TWIC to "develop and implement immediate and long-range strategies to address problems identified within the workforce system."

The primary audience for the system strategic plan is TWIC's partner agencies with workforce programs and services. Covering the period of September 1, 2015-August 31, 2023, the system strategic plan has been devised on an eight-year time frame. This will allow system partners time to align with the new federal workforce requirements under WIOA, and to build programs, initiatives, and systems to achieve the system objectives. During the fourth year of implementation, TWIC will undertake an update of the plan's strategies, action plans, and performance measures, as well as an analysis of the workforce system. This will ensure the continued currency of the plan and will also determine if there are additional issues that should be included in the plan for years five to eight of the implementation period.

In developing the Texas workforce system strategic plan for Fiscal Year 2016-Fiscal Year 2023 (FY 2016-FY 2023), TWIC and its system partners built upon *Advancing Texas: Strategic Plan for the Texas Workforce System FY 2010-FY 2015.* Using a modified planning framework, plan development efforts focused on identifying critical issues and opportunities that system partners must address in the next five to eight years. These were analyzed to determine commonalities across system partners, and were then recast as system objectives. These system-level objectives require collaboration or alignment of programs, initiatives, and outcomes to achieve the stated objective. Structured to avoid

duplication with partner agencies' strategic plans, the system strategic plan identifies and magnifies those key future achievements that are critical to the success of the Texas workforce system in serving its customers.

Over the course of the 18-month planning and development process, several strategic imperatives became apparent as key characteristics that serve as foundational or core elements that represent a best-in-class workforce system. These three imperatives serve as cornerstones upon which the capacity of the Texas workforce system should be built in order to successfully identify and respond to changing market conditions and needs of the workforce system customers. These overarching strategic imperatives are core competencies that must be embedded in all system elements to achieve this plan's vision and mission. Therefore, it is a key tenet of this plan that all workforce system partners have core competencies in and a commitment to:

- Customer Service and Satisfaction

  The ability to accurately assess customer satisfaction with and across workforce system elements and translate this data into useful actions is essential to best meet the needs of workforce system customers. While the overall system strategic plan focuses on a demand-driven system, and has particular emphasis on employers, customer service and satisfaction has multiple dimensions that must be factored into system-level planning. Employers, current and future workers, and system program and service providers are key customers of the Texas workforce system.

  The Texas workforce system must have the ability to identify and anticipate changing employer needs related to skills required to meet the dynamic, global economic framework in which Texas employers operate. Ensuring a work-ready and competent workforce that meets the geographically relevant needs of Texas employers is a core competency of the Texas workforce system.

  The Texas workforce system must have the capacity to meet the needs of both current and future Texas workers—wherever they are in their careers. Customers must be assured that wherever they enter the workforce system, that there is a pathway *through* the system by instituting a "no closed door" culture to ensure successful outcomes or referrals for customers of the Texas workforce system programs and services. Any point of entry provides access to the full continuum of programs and services.

  The Texas workforce system must promote and enable successful collaboration across system partners for the ultimate purpose of improving outcomes for Texas employers and the current and future workforce. The ability to serve Texans collaboratively is the responsibility of all system partners, and facilitating this collaboration is an integral part of this plan.

- Data-Driven Program Improvement

  Program and other data from across the workforce system are critical in evaluating the extent to which workforce system programs, services, and products are meeting the needs of customers and stakeholders. The collection of key data, as well as the

reporting and analysis of that data—in a consistent and useful manner—are essential in demonstrating outcomes, determining if changes are required or desired, and establishing benchmarks for future performance. To achieve these data-related organizational competencies relative to the performance measures noted in this plan, it is recognized that partner agencies may need to build or modify their existing data systems. By doing so, the Texas workforce system can measure what matters most and build the collection and analysis capabilities that are missing.

Information and data also serve a vital communication purpose, not only within the Texas workforce system but also to key stakeholders and others that participate in this process across multiple dimensions. Systems that improve the flow of data, information, and analysis that support effective decision-making across the spectrum of data users are essential to achieve effective and efficient programs, services, and outcomes. While this is a challenging task, it is nonetheless essential to the overall performance of the Texas workforce system.

- Continuous Improvement and Innovation

  The Texas workforce system is part of a dynamic, competitive, and global marketplace. In order to achieve the vision and mission for the workforce system that is articulated in this plan, a commitment to continuous improvement and innovation is essential to ensure an adaptive and best practice-oriented workforce system. Actions that are essential to continuous improvement and innovation include the following:

  - Research and assess best-in-class practices throughout industry and workforce systems nationally and internationally.
  - Incorporate promising practices from outside the Texas workforce system.
  - Analyze program and system performance and move quickly to correct the course, when appropriate, as indicated by empirical data and information.
  - Streamline data, information, communications, and decision-making capabilities to ensure improvement and innovation become embedded into all system elements by ensuring core competencies are developed and nurtured throughout the system.

Crucial to the strategic planning process and in order to align with federal and state statute, the Texas workforce system strategic plan builds upon the system's core elements and contains system goals that TWIC and its planning partners use to create actionable objectives to meet the vision and mission of the system. Four goal areas and their corresponding system objectives and partner strategies have been identified through the processes previously noted.

Goal	System Objective

Goal	System Objective
Focus on Employers	Increase business and industry involvement and expand licensure and industry certification.
Engage in Partnerships	Expand partnerships with system partners and stakeholders to promote collaboration, joint planning, and enhanced participant outcomes.
Align System Elements	Improve and enhance services, programs, and policies to facilitate effective and efficient transitions. Develop and implement policies and processes to ensure portable and transferrable credit and credentials.
Improve and Integrate Programs	Employ enhanced or alternative program and service delivery methods.

The Texas workforce system strategic plan calls attention to issues and opportunities that have cross-partner implications and hold significant strategic value to the overall success of the system's ability to meet its vision and mission. Throughout the course of the plan's development, consideration was given to identifying and assessing high-priority, high-impact issues by system partners, stakeholders, and TWIC for the fundamental purpose of improving performance and outcomes for the workforce system and its customers.

Through careful evaluation, TWIC and other stakeholders identified the following issues that cross the programs or services administered by multiple agencies (cross-partner issues) to be considered as part of the strategic planning process. The following 12 cross-partner issues and opportunities were derived from the 39 planning issues and opportunities previously identified by TWIC and its system partners during preplanning listening sessions and consultations:

- Facilitate effective and efficient transitions and enhance transition services.
- Increase employment outcomes.
- Expand partnerships with system stakeholders and promote collaboration and joint planning.
- Incorporate/expand options for dual credit and/or licensure and certification.
- Increase business and industry involvement.
- Align programs and services.
- Share timely data and information.
- Promulgate promising practices and reduce duplication.
- Recruit and/or provide professional development.
- Ensure portable and transferrable options.
- Address skills shortages.
- Institutionalize alternative service delivery methods.

In September 2015, the FY 2016-FY 2023 workforce system strategic plan was endorsed by TWIC and submitted to the governor for approval.

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.

TWC has a strong commitment to the use of performance data to evaluate programs and partners. TWC was an early implementer of the Common Measures and in 2005 extended them beyond Wagner-Peyser and WIA to cover other federal and even state-funded workforce system programs. TWC realized that using the same measures and definitions across programs helped improve program evaluations and removed potential barriers to integration of services by creating common definitions of success.

TWC actively monitors the system through monthly, and in some cases, weekly performance reports. Program staff reviews these reports and communicates with system partners as appropriate to provide technical assistance and obtain information on best practices to share with other partners. TWC's Commissioners hold open, posted, performance and financial briefings on a quarterly basis. TWC has continued these effective practices under WIOA.

One of the key ways that TWC evaluates programs and partners is by comparing performance to targets. TWC has adopted a system by which performance is compared to target to establish a "Percent of Target" for each measure, and depending on where the Percent of Target falls within a given range, performance is rated as "Meeting" the target (MP) or as being either "Positive Performance" (+P) or "Negative Performance" (-P), as follows:

	Where "High is Good" (% Employed, Median Earnings, etc.)	Where "Low is Good" (Avg Cost, Weeks to Reemploy, etc.)
Positive Performance (+P)	more than 105% of Target	less than 95% of Target
Meeting Performance (MP)	95-105% of Target	95-105% of Target
Negative Performance (-P)	less than 95% of Target	more than 105% of Target

This makes target-setting a key part of the evaluation and accountability system. TWC's DOI uses a variety of different models to help set performance targets based upon assumed casemixes and economic conditions. These methods continuously evolve based on input from partners through the negotiation process and additional research. There is no question that this dialog between TWC and its partners represents an important component of continuous improvement.

WIOA, like WIA before it, requires working towards continuous improvement. However, continuous improvement does not simply mean that the system needs to do better on all

things every year. Continuous improvement is not as simple as always setting targets a little bit higher than the prior year's results. Such a simplistic notion operates under the assumption that other than our results, the system is static, that our customers never change, that our economy never changes, that our funding never changes, that the law of diminishing returns does not apply to the workforce system. The reality is that these things do change, and performance in some areas eventually reaches the point of diminishing returns. When that happens, the system is better served by setting targets in the areas of great strength at a "maintenance" level to concentrate on improving in areas of lesser strength. In an environment of fewer resources or greater demand for similar resources, simply maintaining performance can represent improvement—improvement in efficiency.

It is precisely the fact that we operate in a dynamic system that makes the development of effective statistical models to guide target setting so important. WIOA provides that the Secretaries of Labor and Education will develop a set of statistical models to help set performance targets for the WIOA measures. TWC will use those models as a tool to help it evaluate programs and partners. However, we are concerned that these national models will not be equally accurate for all states; they cannot be because local labor markets are different. Speaking Spanish-only has a lesser impact on employment outcomes in states with large bilingual populations than states where Spanish speaking is far less common. A change in employment in the oil and gas industry may have a huge economic impact in Texas or North Dakota but have little relevance to Illinois performance. As such, TWC will continue to develop its own performance models to use in addition to the national models.

However, while the statute provides a set of performance measures to evaluate the six core programs and system partners, these measures are certainly not the only measures of evaluating the system, nor are they even the best such measures. In addition to having far too much lag to be useful for management purposes, most of the WIOA measures were developed by an National Governors Association workgroup in 2004. The reality is that the workforce system in 2015 is very different than it was in 2004. The job search/recruitment assistance options that job seekers and employers had in 2004 were far more limited than they are today. WIOA places great emphasis on the importance of the career pathways that a person might follow over a period of many years, while the performance measures and the Departments' proposed reporting constructs are based on the notion of a person losing employment and coming to the one-stop system for a relatively short, finite period, after which they find a job and leave so that his or her outcomes can be measured.The statutory measures also do not recognize that post-exit enrollment in education is sometimes an appropriate outcome for non-Youth such as those who are transitioning out of the military and using their GI Bill benefits to attend school. Additionally, the statutory measures do not address the question of whether exiters are able to retain employment even though that is a key concern for TWC customers.

Therefore, while TWC will apply the statutorily prescribed performance measures to assess performance across the six core programs, TWC will also apply state-prescribed performance measures and—with input from local Boards, grantees, and other partners—will continually develop and test other measures that may provide a more meaningful means of communicating strengths and identifying areas of improvement. Examples include a set of WIOA-based measures that TWC developed that focus on either employment or enrollment in education post-exit, regardless of the program, and a retention-like measure that focuses on those employed or enrolled in quarter 2, post-exit, and to see whether they

remain employed or enrolled in quarters 3 and 4, post-exit. TWC also plans to return to working on a set of performance measures that focus more on the employment connection made between a worker and employer during the state plan period.

B. ASSESSMENT OF ONE-STOP PROGRAM PARTNER PROGRAMS

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

TWC's experience with integrated Common Measures has demonstrated its value in promoting one-stop partner responsibility for the success of its services while boosting participant accessibility and transparency within the Texas Workforce System. Therefore, TWC applies the same measures and methodologies to other one-stop partner-programs that it does the core programs, in addition to any program-specific measures that are required by either federal or state regulations or identified by TWC as appropriate for a given program. For example, the U.S. Department of Health and Human Services' regulations (45 C.F.R §264.30, *et seq.*) allow recipients of assistance to engage in a variety of activities that count toward the TANF Work Participation measure. TWC, as permitted, established an alternate measure that focused on recipients meeting work participation requirements exclusively through paid employment (other than for in-school teens working toward a diploma).

Regardless of whether a program is a core program or a partner program, or whether a measure is required by WIOA or state law, or was created in partnership with Boards or other grantees, TWC will apply performance measures and perform evaluations at the customer level first and then aggregate results by program or population or partner. As discussed further in the Program Data section of this plan, TWC needs to be able to freely apply data from all sources to customer records to ensure that program results are not artificially boosted or limited because one program has access to critical data that others do not. This is particularly important in those instances where a customer is enrolled in both a core and non-core (perhaps state-funded) program; that customer's results should be reflected the same way at both the system-level and in the results for each program that helped the customer achieve those results.

C. PREVIOUS ASSESSMENT RESULTS

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

TWC met or exceeded its Program Year 2016 (PY 2016) performance targets negotiated with the US Department of Labor (DOL) for WIOA Title I and Title III Wagner-Peyser programs. Additionally, TWC met or exceeded its state-based performance outcome measures for these programs. This suggests that TWC's strong working relationship with Boards continues to promote a high-quality system. However, all the exiters included in last

year's performance outcomes exited before the state and Boards knew that TWC's long-standing request for a Board Accountability Flexibility waiver request had been denied by the Departments. TWC is concerned that the return to focusing on "program silos" rather than focusing more broadly on participants could have negative consequences for the state's workforce system that will be evident in future performance results. Because of this concern, TWC has submitted a revised version of its waiver request for approval with this two-year modification to the state plan.

TWC's performance outcomes in Title II were not as strong as TWC had hoped. For PY16, the Office of Career, Technical, and Adult Education (OCTAE) implemented only the Measurable Skill Gains measure, and although TWC reached more than 90 percent of the negotiated target, that is lower than TWC's usual standard, which is 95 percent of target. However, TWC believes that the lower rate may have been due, in part, to recent changes made to the common assessment instruments. TWC's Adult Education and Literacy (AEL) program has been developing new technical assistance to help local providers adapt their curricula to the assessment tools. To be clear, the intent is not to teach students how to beat the test. The intent is to better prepare students for the subject matter that they will be tested on.

While OCTAE did not implement exit-based outcome measures for PY'16 (or PY'17-PY'19), Texas still had state accountability measures to meet for last year and met the measures related to employment and high school equivalency achievement. Additionally, TWC has implemented a set of WIOA-based outcome measures that includes performance targets for state reporting for PY'17 and beyond.

The US Department of Education's Rehabilitation Services Administration (RSA) placed all WIOA measures in "baseline status" for PY'16-PY'19. However, that does not mean that TWC is operating the VR program without performance accountability. For PY'16, TWC's VR program met or exceeded all its measures, including, most importantly, the Successful Closure Rate. While the Successful Closure Rate measure has been replaced in the WIOA accountability model, the new measures introduce a level of "reporting lag" that the program has not historically had to accommodate. However, TWC used historic data on VR exiters to create historic WIOA outcomes for more than six years. TWC compared outcomes for the WIOA Employed Quarter 2, Post-Exit measure to the old Successful Closure Rate measure and found an extremely high correlation. This makes the old Successful Closure Rate an extraordinarily valuable leading indicator; perhaps the best TWC has ever seen in the workforce system.

Additionally, TWC implemented a set of WIOA-based measures for the VR program, which set performance targets for PY'17 and beyond. TWC expects the measures to put the state in a good position to work with RSA as RSA implements WIOA's performance accountability measures more broadly in the future.

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.

Ultimately, the three most important resources available to the workforce system and really any organization are its customers, its people (including Boards and other partners), and its data. TWC's Division of Operational Insight was created to help better leverage that data to help the system become more effective and efficient, and the division has primary responsibility for conducting evaluations of the workforce system in Texas.

TWC uses a variety of statistical techniques to conduct evaluations but primarily uses quasi-experimental evaluation techniques rather than random assignment trials. While less "academic" in approach than random assignment trials, quasi-experimental evaluation provides a balance between evaluation rigor and the desire to move quickly to implement process changes or new initiatives.

In addition, TWC uses a blend of Six Sigma, Lean, and Theory of Constraints called Rapid Process Improvement (RPI) to evaluate system processes and identify opportunities for improvement and test the results of changes. RPI is a core part of TWC's approach to continuous improvement and has recently been rolled out to our Boards.

TWC works with local Boards and other partners and academic researchers on system evaluations and has participated in numerous federal studies such as the WIA Gold Standard Study from several years ago. TWC will look for opportunities to coordinate and cooperate with the Secretaries of Education and Labor on studies that are aligned with the research priorities of TWC and its Boards and partners. In addition, TWC believes that the regular webinars and regional calls that the Departments of Education and Labor hold provide an excellent avenue for coordinating such work and sharing results between the states and the Departments.

TWC has developed a new Data Warehouse system to support advanced reporting and analytics. The system will streamline standard reporting to improve efficiency and will provide more resources for analysis and evaluation work. The system will also allow TWC to better connect data on participants, services, and outcomes across programs to enable TWC to monitor the highest level of data (that is, systemwide) as well as monitor at the program level (WIOA Titles I-IV and beyond) or the characteristic level (that is, subpopulations across all programs) or a combination thereof (individuals in a program who meet specific conditions).

Over the past year, many of TWC's analytic resources have been heavily focused on WOIA implementation activities, such as conducting an updated Comprehensive Statewide Needs Assessment and developing Participant Individual Record Layout (PIRL) and RSA-911 logic and testing. However, as that work begins to wind down over the next year, the Division of Operational Insight (DOI) has begun looking at several evaluation projects.

Regarding the Career and Training program, DOI is developing a new model to identify UI claimants who need additional assistance to have a timely return to work. This will be the seventh such model that TWC has developed and the sixth in the last 12 years. Additionally, TWC is interested in leveraging similar techniques to identify individuals who are not claimants but who might also benefit from additional assistance.

TWC has also invested heavily in providing professional development to teachers in the AEL program. DOI will be working with AEL to see whether TWC can measure the effectiveness of professional development by looking at student engagement and outcomes, before and after the teachers participate in professional development. It is not clear yet whether TWC will have a sufficient number of students to evaluate before and after the professional development. However, at some point, TWC expects to have enough data; therefore, even if the project is delayed, TWC's initial analysis and planning should ultimately prove useful.

TWC also has a number of evaluation projects planned for the VR program. The VR program has operated several specialized programs that serve specific groups of participants. DOI is working with the VR division to evaluate several of the specialized programs, including the following:

- Project Search - a program that uses a rotation of internships to improve competitive employment in an integrated setting for youth who have intellectual disabilities
- Project Hire - a program that helps individuals with severe developmental disabilities to complete postsecondary education
- Criss Cole Rehabilitation Center - a residential VR training facility that serves adults who are legally blind by helping them learn alternative techniques to prepare for, find, and retain employment and/or attend postsecondary education, and/or live independently in the community

Additionally, Texas is participating in the University of Richmond's Vocational Rehabilitation Return of Investment project. TWC is providing data to the study as well as serving in advisory and steering roles for the project.

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—

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

TWC's three-member Commission adopted Fiscal Year 2016 Block Grant Allocations on August 11, 2015, pursuant to Texas Labor Code §§301.001, 302.002, and 302.065. These sections establish TWC to operate an integrated workforce development system in the state, in particular through the consolidation of job training, employment, and employment-support services (including subsidized child care), to achieve an efficient and effective delivery of services and to allocate funds to local workforce development areas (workforce areas) for the purpose of meeting or exceeding statewide performance targets, as set forth in the General Appropriations Act and as consistent with federal and state program requirements.

Specifically, Texas Labor Code §302.062(a) prescribes that TWC shall provide to the workforce areas, in which Boards have been certified and local plans approved by the governor, through a block grant process.

The majority of the funds appropriated to TWC under House Bill (HB) 1, the General Appropriations Act, 84th Texas Legislature, Regular Session (2015), for the FY 2016-2017 biennium, are included in the block grant allocations to all workforce areas throughout the state (including those allocations adopted for WIOA Title I and Title II programs). These block grant allocations, which consist of state and federal program funds for workforce training and employment and support services, are awarded in concert with the requirements of associated state and federal statutes, program regulations and rules, and TWC contract provisions and requirements.

Pertinent informational references to TWC rules provisions are made throughout the block grant allocations package, clarifying:

- how allocations were computed;
- what allocation factors were used;
- the sources of the allocation factor data;
- the history of similar allocations for the two years prior to the FY 2016 allocations;
- why these allocations are largely based on estimated federal amounts, and may need to be subsequently amended (because federal FY 2016 appropriations have not yet been enacted); and
- various other details regarding relevant assumptions, explanations, and associated information.

The TWC executive director is ordered to administer these block grant allocations in the most feasible and economical manner and within all guidelines prescribed by HB 1, General Appropriations Act, 84th Legislature, Regular Session (2015), the Texas Labor Code, and TWC rules.

For Title I Programs

Within-State allocations of formula-funded WIOA Title I will be made pursuant to statutory provisions for Youth Activities under §128(b), and Adult Employment and Training Activities and Dislocated Worker Employment and Training Activities under §133(b) and pursuant to conforming Texas Workforce Commission rules (40 TAC §800.63).

Youth Activities funds not reserved for statewide workforce investment activities (as authorized under WIOA §128(a)(1)) will be made available as Within-State Allocations for Youth Activities to workforce areas on the basis of:

- 33 1/3 percent of the funds on the basis of the relative number of unemployed individuals in areas of substantial unemployment (as defined in WIOA §127(b)(2)(B) and §132(b)(1)(B)(v)(III)) residing within each local workforce development area (workforce area), compared to the total number of unemployed individuals within all areas of substantial unemployment in the state (Period and Source of the Data: 12-month period ending June of the prior year, TWC Labor Market and Career Information (LMCI) Department);

- 33 1/3 percent of the funds on the basis of the relative excess number of unemployed individuals (as defined in WIOA §127(b)(2)(D) and §132(b)(1)(B)(v)(VI)) residing within each workforce area, compared to the total excess number of unemployed individuals within the state (Period and Source of the Data: the higher of the 12-month period ending June of the prior year or the prior calendar year, TWC LMCI Department); and
- 33 1/3 percent of the funds on the basis of the relative number of disadvantaged youth (as defined in WIOA §127(b)(2)(C)) residing within each workforce area, compared to the total number of disadvantaged youth within the state (Period and Source of the Data: U.S. Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter (TEGL) No. 21-12, March 26, 2013, Table 6).

Within-State Allocations to workforce areas (as provided in WIOA §128(b)(2)(A)(ii), §133(b)(2)(A)(ii), and §133(b)(B)(iii)) shall meet minimum percentages for Youth Activities, Adult Employment and Training Activities, and Dislocated Worker Employment and Training Activities (for FY 2016 or a subsequent year) that are no less than 90 percent of the average allocation percentage among the workforce areas in the state for the two preceding fiscal years.

In concert with the requirements of Texas Labor Code §302.062(d), block grant allocated funds for workforce training and employment services and associated support services shall be allocated by the Commission among the workforce areas in the state that are no less than 90 percent or more than 125 percent of the proportion during the two preceding fiscal years.

Of the amount allocated from the Within-State Allocation for a fiscal year, not more than 10 percent of the amount may be used by the Board involved for the administrative costs of carrying out local workforce investment activities (as provided in WIOA §128(b)(4) and §133(b)).

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

Adult Employment and Training Activities funds not reserved for statewide activities (as provided in WIOA §128(a)(1) and §133(a)(1)) will be made available as Within-State Allocations for Adult Employment and Training Activities to workforce areas on the basis of:

- 33 1/3 percent of the funds on the basis of the relative number of unemployed individuals in areas of substantial unemployment (as defined in WIOA §127(b)(2)(B) and §132(b)(1)(B)(v)(III)) residing within each workforce area, compared to the total number of unemployed individuals within all such areas of substantial unemployment in the state (Period and Source of the Data: 12-month period ending June of the prior year, TWC LMCI Department);
- 33 1/3 percent of the funds on the basis of the relative excess number of unemployed individuals (as defined in WIOA §127(b)(2)(D) and §132(b)(1)(B)(v)(VI)) residing within each workforce area, compared to the total excess number of unemployed individuals within the state (Period and Source of the

Data: the higher of 12-month period ending June of the prior fiscal year or the prior calendar year, TWC LMCI Department); and

- 33 1/3 percent of the funds on the basis of the relative number of disadvantaged adults (as defined in WIOA §132(b)(1)(B)(v)(IV)) residing within each workforce area, compared to the total number of disadvantaged adults within the state (Period and Source of the Data: U.S. Department of Labor, Employment and Training Administration, TEGL No. 21-12, March 26, 2013, Table 6.)

Within-State Allocations to workforce areas (as provided in WIOA §128(b)(2)(A)(ii), §133(b)(2)(A)(ii), and §133(b)(B)(iii)) shall meet minimum percentages for Youth Activities, Adult Employment and Training Activities, and Dislocated Worker Employment and Training Activities (for FY 2016 or a subsequent year) that are no less than 90 percent of the average allocation percentage among the workforce areas in the state for the two preceding fiscal years.

In concert with the requirements of Texas Labor Code §302.062(d), block grant allocated funds for workforce training and employment services and associated support services shall be allocated by the Commission among the workforce areas in the state that are no less than 90 percent or more than 125 percent of the proportion during the two preceding fiscal years.

Of the amount allocated from the Within-State Allocation for a fiscal year, not more than 10 percent of the amount may be used by the Board involved for the administrative costs of carrying out local workforce investment activities (as provided in WIOA §128(b)(4) and §133(b)).

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

Dislocated Worker Employment and Training funds not reserved for statewide activities (as provided in WIOA §128(a)(1) and §133(a)(1)) or statewide rapid response activities (as described in WIOA §132 (b)(2)(B)) will be made available as Within-State Allocations for Dislocated Worker Employment and Training Activities to workforce areas on the basis of:

- 20.00 percent (PY 2015 factor weight) of the funds on the basis of the relative number of insured unemployed individuals (i.e., average monthly total number of unemployed individuals who are covered by state and federal unemployment insurance program) residing within each workforce area, compared to the total number of insured unemployed individuals within the state (Period and Source of the Data: prior calendar year, TWC's Claimant Characteristics Report);
- 19.67 percent (PY 2015 factor weight) of the funds on the basis of the relative average number of unemployed individuals residing within each workforce area, compared to the average number of unemployed individuals within the state (Period and Source of the Data: prior calendar year, Monthly Local Area Unemployment Statistics, LAUS Estimates Report, TWC LMCI Department);
- 10.33 percent (PY 2015 factor weight) of the funds on the basis of the relative number of workers residing within each workforce area who are included on Texas plant closure and layoff notices issued under authority of the Worker Adjustment

Retraining Notification Act (WARN), compared to the number of such workers within the state (Period and Source of the Data: prior calendar year, TWC Workforce Development Division);

- 20.00 percent (PY 2015 factor weight) of the funds on the basis of the relative proportion of state's declining industries (for the four calendar quarters ending the prior September, compared to the four quarters ending September of two years earlier), for any industry group reflecting statewide decline, for any workforce area and also showing a decline in those respective industry groups (six-digit NAICS industry classification), aggregated by workforce area (Period and Source of the Data: period of data as described, TWC LMCI Department);
- 19.67 percent (PY 2015 factor weight) of the funds on the basis of the relative proportion of individuals in Farmer-Rancher Economic Hardship (i.e., total population of farm and ranch employees who are not covered by unemployment insurance) residing within the workforce area, compared to the total number of individuals within the state in Farmer-Rancher Economic Hardship (Period and Source of the Data: prior calendar year, Texas State Data Center); and
- 10.33 percent (PY 2015 factor weight) of the funds on the basis of the relative proportion of individuals in Long-Term Unemployment (i.e., the average monthly number of individuals, residing within each workforce area who have been unemployed for 14 weeks or longer) residing within the workforce area, compared to the total number of individuals within the state in Long-Term Unemployment (Period and Source of the Data: prior calendar year, TWC's Claimant Characteristics Report).

Within-State Allocations to workforce areas (as provided in WIOA §128(b)(2)(A)(ii), §133(b)(2)(A)(ii), and §133(b)(B)(iii)) shall meet minimum percentages for Youth Activities, Adult Employment and Training Activities, and Dislocated Worker Employment and Training Activities (for FY 2016 or a subsequent year) that are no less than 90 percent of the average allocation percentage among the workforce areas in the state for the two preceding fiscal years.

In concert with the requirements of Texas Labor Code §302.062(d), block grant allocated funds for workforce training and employment services and associated support services shall be allocated by the Commission among the workforce areas in the state that are no less than 90 percent or more than 125 percent of the proportion during the two preceding fiscal years.

Of the amount allocated from the Within-State Allocation for a fiscal year, not more than 10 percent of the amount may be used by the Board involved for the administrative costs of carrying out local workforce investment activities (as provided in WIOA §128(b)(4) and §133(b)).

B. FOR TITLE II:

I. MULTI-YEAR GRANTS OR CONTRACTS

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

AEL under WIOA Title II provides in §211 the basis and methodology for the awarding of state grants for AEL activities, and in §243 the basis and methodology for the allotment of funds for integrated English literacy and civics education (IEL/CE), and in §225 for the use of funds for corrections. In concert with this basis and methodology, and pursuant to conforming TWC rules (40 TAC §800.68) as outlined below, AEL allocations are made available to each workforce area.

- The Department of Education (ED) allocates AEL State Grant funds on the basis of their relative proportion of the nation's total number of individuals at least 18 years of age without a secondary school diploma and who are not enrolled in school. TWC allocates these funds (together with associated state general revenue matching funds) on the same basis to workforce areas across the state. TWC determines to obtain from the Texas State Data Center the most recent data available for this same allocation factor each year, as directed by the Texas Labor Code and TWC rules. As allocation factors for TWC block grants must be aggregated to the 28 workforce areas throughout the state, the most effective approach is to obtain allocation factor data values/estimates by county and then to aggregate to workforce areas.
- Pursuant to TWC rules §800.68(b) and (c), federal funds constituting the state award of the Adult Education and Family Literacy Act (AEFLA) grants (excluding amounts received for IEL/CE) and associated state general revenue matching funds shall be allocated to workforce areas based on the relative proportion of individuals residing within each workforce area who are at least 18 years of age, do not have a secondary school diploma or its recognized equivalent, and are not enrolled in secondary school, during the most recent period for which statistics are available.
    - Federal funds constituting the state award of AEFLA State Grants (excluding amounts received for IEL/CE) and associated state General Revenue matching funds for the pertinent program year/fiscal year are allocated using statistics provided by the Texas State Data Center. The allocation factor data consists of the most recent estimates available by the U.S. Bureau of the Census' American Community Survey (ACS) three-year Public Use Microdata Sample (PUMS), applied to Texas State Data Center county population estimates (aggregated to workforce area populations). This data set is consistent with that used by ED in determining AEFLA state grants.
    - At least 82.5 percent of the federal funds constituting the state award of AEFLA state grants (excluding amounts received for IEL/CE) and associated state General Revenue matching funds for the pertinent program year/fiscal year are allocated based on the relative proportion of individuals residing within each workforce area who are at least 18 years of age, do not have a secondary school diploma or its recognized equivalent, and are not enrolled in secondary school, during the most recent period for which statistics are available; an equal base amount; and the application of a hold-harmless procedure.

      Pursuant to TWC rule §800.68(d), AEFLA federal funds received for IEL/CE are allocated to workforce areas based on the same methodology and data factors provided in WIOA §243(b). At least 82.5 percent of the federal funds constituting the state allotment of amounts for EL/Civics for the pertinent

program year/fiscal year are allocated based on: (A) the relative proportion based on (1) 65 percent of the average number of legal permanent residents during the most recent 10-year period, available from U.S. Citizenship and Immigration Services data, and (2) 35 percent of the average number of legal permanent residents during the most recent three-year period, available from U.S. Citizenship and Immigration Services data; (B) an equal base amount; and (C) application of a hold-harmless procedure.

Pursuant to TWC rule §800.68(e), TANF federal funds associated with the AEL program will be allocated by the Commission to workforce areas according to a need-based formula. 100 percent of the TANF funds will be based on: (A) the relative proportion of the unduplicated number of TANF adult recipients residing within the workforce area with educational attainment of less than a secondary diploma during the most recently completed calendar year; (B) an equal base amount; and (C) the application of a hold-harmless procedure.

Title II Adult Education and Literacy Statewide Competition and Awards

To facilitate rapid alignment to service delivery enhancements under WIOA, TWC will hold a statewide competition in the fall of 2016 for contracts starting July 1, 2017. Multi-year contracts consist of 24 month contracts with the option of renewals or extensions in any combination of years or months, at the Agency's discretion, provided that the total grant period does not exceed five (5) years.

A competitive Request for Proposal (RFP) process will be used by TWC on a standard format used by the agency. All eligible providers follow the same competitive procedures. The RFP will provide instructions for preparation of proposals, a deadline for submitting a notice of intent to apply and a deadline for receipt of the proposals, review criteria, assurances, and other legal, fiscal, and program requirements; and plans for cooperative arrangements the eligible provider will develop with other agencies, institutions, or organizations for the delivery of AEL services.

Grantees will respond to questions in the proposal that include requirements as outlined in WIOA Sec. 232(1)-(7). The review of proposals will include rating responses to questions aligned to the 13 considerations in WIOA Sec. 231(e)(1)-(13).

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

- RFP Development - Mon 02 May '16 - Fri 09 Sep '16
- RFP Publication - Fri 30 Sep '16 - Tue 29 Nov '16
- Question and Answer document published - Tue 11 Oct '16 - Wed 19 Oct '16
- Proposal submission deadline - Tue 29 Nov '16 - Tue 29 Nov '16
- Evaluation and Score - Thu 08 Dec '16 - Mon 09 Jan '17
- Contract Development - Wed 25 Jan '17 - Wed 22 Mar '17
- Final Contract - Thu 23 Mar '17 - Wed 29 Mar '17
- Contract Execution - Thu 30 Mar '17 - Wed 19 Apr '17
- PY' 17 start of service delivery - July 1, 2017

Title II Adult Education and Literacy Determining Demonstrated Effectiveness

Through the AEL competition, eligible providers will be required to demonstrate past effectiveness by providing performance data on documented factors of improving the skills of eligible individuals, particularly eligible individuals who have low levels of literacy, in the content domains of reading, writing, mathematics, and English language acquisition. Prior TWC AEL grant recipients will be required to provide performance data required under section 116 of WIOA to demonstrate past effectiveness as evidenced by data from the Texas Educating Adults Management System (TEAMS) student data management system to demonstrate the extent to which they met State-negotiated performance measures for all state and federal performance measures.

Eligible providers that have not been previously funded under Title II of the WIOA must provide performance data to demonstrate its past effectiveness in serving basic skills deficient eligible individuals including those with low levels of literacy in the content domains of reading, writing, mathematics, and English language acquisition and demonstrate the extent to which they objectively evaluate performance criteria in achieving outcomes listed under section 116 of WIOA.

Eligible providers must also provide information regarding its outcomes for participants related to employment, attainment of secondary school diploma or its recognized equivalent, and transition to postsecondary education and training.

Proposal review criteria for all proposals will include evaluation and scoring based on a standard of demonstrated effectiveness.

II. ENSURE DIRECT AND EQUITABLE ACCESS

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

Texas aligned AEL and workforce development systems in 2013. The alignment required statewide deployment of models to develop the skills needed to transition to and complete postsecondary education programs and obtain and advance in employment. Successful models have included IET, career pathways, distance learning, and college and workforce preparation activities. Texas also aligned service-delivery options for individuals with disabilities and other special needs. AEL statewide service-delivery contracts are compliant with WIOA requirements under performance, workforce system, and rehabilitative services alignment and programmatic integration.

Texas funded new local provider grants for all services, including ELC, up to five years beginning in PY'14-15, and current contracts will be in place through PY'16-17; thus, TWC will not be conducting a grant competition in PY'15-16.

As outlined in the PY'13 plan, TWC conducted procurement for all services in spring 2014 and awarded contracts beginning July 1, 2014. AEFLA §232 requires that eligible providers desiring a grant or contract submit an application containing required information and assurances, including a description of:

- how funds awarded will be spent; and

- any cooperative arrangements the eligible provider has with other agencies, institutions, or organizations for the delivery of AEL services.

Contracts awarded to AEL grant recipients were limited to two years, with the option of three one-year renewals at the discretion of TWC's three-member Commission (Commission), taking into account performance and other factors. Renewals for years three, four, and five are not automatic, and will be based on meeting or exceeding performance and expenditure benchmarks, or other factors as determined by the Commission. At the completion of the five-year maximum contract term, TWC will conduct a new competitive statewide procurement. All contracts, including those that have been in effect for less than the maximum five-year contract term, must be competitively procured during subsequent statewide procurements.

Of the funding Texas receives to administer AEL services, 82.5 percent must be used to provide AEL services as stipulated in AEFLA §231. Of the 82.5 percent, up to 10 percent is allowed for corrections education and education for other institutionalized adults.

Federal AEL funds may be used for programs for out-of-school individuals who are at least 16 years of age and:

- function at less than a secondary school completion level;
- lack a secondary school credential; or
- are unable to speak, read, or write in English.

State AEL funds are for programs for out-of-school individuals who are beyond compulsory school-attendance age and:

- function at less than a secondary school completion level;
- lack a secondary school credential; or
- are unable to speak, read, or write in English.

Eligible providers for a grant or contract under TWC include, but are not limited to, the following:

- Local education agency;
- Community-based organization or faith-based organization;
- Volunteer literacy organization;
- Institution of higher education;
- Public or private nonprofit agency;
- Library;
- Public housing authority;
- Nonprofit institution that has the ability to provide literacy services to eligible individuals;
- Consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described above; and
- A partnership between an employer and any of the entities described above.

TWC intends all potential grantees have direct and equitable access to AEL funding opportunities as evidenced in its 2014 Request for Proposals (RFP) competition for AEL providers. Notice of availability of awards was distributed via e-mail distribution lists of current providers and new stakeholders collected over 11 months. Availability of awards was also advertised on the AEL website as well as in Texas Electronic State Business Daily, the Texas Comptroller's website, which houses announcements and details of all open procurement in Texas.

TWC uses a Request for Proposal (RFP) competitive process under which all proposals for funding are treated in the same manner in terms of review and evaluation during the RFP process including the same announcements, proposal materials, and review and award process for each RFP the state issues. TWC ensures all eligible providers have direct and equitable access to AEL funding opportunities. All offerors eligible under Section 231 of WIOA will submit proposals directly to TWC. They will not be required to apply through another agency or agencies in a multi-tiered process. Notice of availability of awards will be distributed via e-mail distribution lists of current providers, Literacy Texas, the state's non-profit literacy council network, Texas community and technical college systems, Local Workforce Development Boards, as well as public posting on the AEL website and the Texas Electronic State Business Daily, the Texas Comptroller's website, which houses announcements and details of all open procurement in Texas. The RFP processes will be designed so that direct application to TWC is clearly evident, customary, and nonnegotiable.

C. TITLE IV VOCATIONAL REHABILITATION

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

The planned allocation of VR funds for FY 2017 will be 80% to VR General and 20% to VR Blind. This allocation has been in place in Texas for many years. It was initially agreed upon by the legacy Vocational Rehabilitation agencies following review of demographics and estimated needs of people with visual impairments. This allocation will ensure consistent funding to both Designated State Units (DSUs) and will retain established levels of service to both consumer populations following the combination of DSUs in FY 2018.

6. PROGRAM DATA

A. DATA ALIGNMENT AND INTEGRATION

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

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

TWC operates a collection of different IT systems to capture participant information, services, and outcomes. Many of these systems were legacy systems that were transfered to TWC as programs were moved to the agency. TWC supports efforts to increase efficiency while maintaining quality levels of service through judicious use of resources and adhering to policy (local, state, and federal). To these ends, TWC is currently evaluating workforce system solutions in other states to better unite the case management and job search functions of our programs. As successful systems are identified, TWC and Texas Workforce Solutions look to demo their delivery with Boards. While TWC is exploring ways to either integrate or replace these systems, such changes would not be completed during the life of this plan.

The Texas workforce system has been on the leading edge of performance measurement, evaluation, and accountability within the national workforce system for over a decade. In 2003, TWC implemented a set of systemwide performance measures that successfully improved employer engagement and effectiveness serving employers. In 2005, TWC embraced the Common Measures and applied them to all state and federally funded employment and training programs using common Periods of Participation and integrated reporting. TWC also obtained a performance measure waiver that gave TWC flexibility in selecting performance measures to contract with Boards so that the system could break down program siloes and focus on integrated services. In 2006, TWC became the first state to file a WISPR. Several times over the next nine years, TWC redeveloped the WISPR for DOL in order to simplify the system and add additional functionality, each time mentoring other states interested in integrated reporting with or without the WISPR.

TWC envisions leveraging its experience in building an integrated reporting system to support Common Measures and the WISPR to build a similar system to perform integrated reporting for WIOA and for reports required by WIOA §116. Customer data from TWC's case management systems, as well as other data such as UI wage records, will be extracted and combined to produce customer-centric, rather than program-centric, records to be used in reporting. The envisioned platform will allow integration of customer records across all six core programs as well as a variety of other partner programs to provide a holistic view of each customer, their services, and their outcomes.

These efforts will eventually lead to the implementation of a data warehouse and analytics platform that will support oversight, consumer education, and decision-making at all levels of the workforce system. The integrated warehouse may also be a means to deliver some of the benefits that an integrated case management system is envisioned as providing. This model will allow TWC to work to develop advanced statistical models that can help identify not only who most needs services but to also help prescribe the types of services that may be most effective for a given customer based on what we learn from having served similarly situated customers in the past.

Although the implementation of WIOA measures will bring challenges to TWC, the shift from measures that focused primarily on first and third quarters after Exit to measures that focus on second and fourth quarters after Exit is not expected to be overly complicated.

However, there could be significant complications if the final definitions of Participant and Exit largely match those proposed in the WIOA NPRM.

TWC's existing reporting system is used for both federal and state performance reporting. The system creates common, integrated PoPs, which begin upon receipt of a qualifying service from any state or federally funded employment and training program (provided via self-service or through staff-assisted), and end when the Participant goes 90 days without receipt of qualifying services (via self-service or staff-assisted), along with no planned gap-in-service. Because TWC's state measures loosely match federal measures, TWC has been able to use the same Periods of Participation for both state and federal performance reporting, since they start and end the same way.

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In addition to the reporting required under WIOA §116(d), TWC will be actively monitoring and evaluating the Texas workforce system under WIOA §116(e). Evaluation efforts will include applying both federal- and state-prescribed performance measures, in addition to continually developing and testing other measures. Consistent with WIOA §116(i), TWC will be using data obtained from other states to implement this part of TWC's Combined State Plan.

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

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These efforts will eventually lead to the implementation of a data warehouse and analytics platform that will support oversight, consumer education, and decision-making at all levels of the workforce system. The integrated warehouse may also be a means to deliver some of the benefits that an integrated case management system is envisioned as providing. This model will allow TWC to work to develop advanced statistical models that can help identify not only who most needs services but to also help prescribe the types of services that may be most effective for a given customer based on what we learn from having served similarly situated customers in the past.

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be using data obtained from other states to implement this part of TWC's Combined State Plan.

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

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

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In addition to the reporting required under WIOA §116(d), TWC will be actively monitoring and evaluating the Texas workforce system under WIOA §116(e). Evaluation efforts will include applying both federal- and state-prescribed performance measures, in addition to continually developing and testing other measures. Consistent with WIOA §116(i), TWC will be using data obtained from other states to implement this part of TWC's Combined State Plan.

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

B. ASSESSMENT OF PARTICIPANTS' POST-PROGRAM SUCCESS

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

TWC continues to work with local partners in developing performance reporting systems that provide information about how services impact customer outcomes. As TWC improves its suite of automated systems, partners gain the ability to capture a more complete set of customer data that supports categorical workforce programs and stores the associated data in a central repository.

TWC's vision for its next generation integrated performance reporting system involves incorporating customer data from all federal and state-funded employment and training programs coupled with a customer-focused data model that will support aggregating data into any combination of programs and characteristics. This will allow the system to meet program reporting requirements as well as permit other views of the data. Key to its effectiveness and ability to support transparency and accountability, the system will need to be able to report a customer's outcomes the same way for every program or aggregation of data, except in instances where the cell size is small enough that it could not be reported without risking confidentiality. This means that if a customer who received services from WIOA Adult and SNAP E&T and was found to be employed in the second quarter after Exit through data obtained from another state, TWC will report that success in both WIOA Adult and SNAP E&T performance measures to ensure that stakeholders and elected officials have a complete and accurate view of each program's contribution to successful employment outcomes.

As important as evaluating participants' outcomes is in helping to ensure accountability, it is by no means the end. Once TWC has identified the most effective set of measures, it will turn to evaluating current and historic data to move past simple descriptive statistics and into predictive and, most importantly, prescriptive statistics. That is, TWC seeks to understand what factors influence performance in order to be able to determine whether results achieved were reasonable, to predict what levels of performance is likely to be achieved in the future, and to identify what actions the system should take when serving specific customers to achieve effective outcomes. These efforts will support continuous

improvement and set the foundation for developing means to measure the return on investment.

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.)

Wage records, despite the time lag associated with using them, remain the best, most objective source of information for determining employment-related outcomes. Measures that use wage records are also far more efficient and less costly than those that depend on administrative data. States, for example, could match to UI wage records to verify program-specific, customer-level data furnished by providers of training services. In addition, TWC encourages the Secretary of Labor—in consultation with the Workforce Information Advisory Council, federal agencies, and states—to develop standardized definitions for the data elements composing wage records as well as improved processes and systems for the collection and reporting of such records.

In light of the discussion on adding data elements to the quarterly wage reports (preamble to NPRM §652.302), TWC recommends serious consideration of the costs and additional burden of any change to wage record reporting. Employer input is certainly fundamental to any changes or additions. TWC estimates it may cost $2 million to modify its reporting systems to incorporate a new data element on the employer wage reports. This estimate excludes the cost to employers. Costs attributable to audits and delinquent reporting reviews will also increase if additional elements are added to the reporting process.

TWC currently makes extensive use of quarterly UI wage records as part of its common data systems both for required and ad hoc reporting and makes the data available to the Boards, other state agencies, and various researchers either directly or by performing matches to seed records provided by the external entity.

While TWC and the local Boards generally operate Texas Workforce Solutions as an integrated system that focuses on customer outcomes rather than program outcomes, there is often interest in program-specific outcomes. TWC is committed to providing consistent, reliable, and comparable performance data to partners, stakeholders, and the public. Therefore, TWC calculates performance at the customer-level across programs and then aggregates the results by sublevel, such as by program or for customers with given characteristics.

Historically, TWC's ability to provide consistent, reliable, and comparable data was negatively impacted when a customer was served through a DOL program such as WIA Adult and another program such as SNAP E&T, and the person was found to be working in another state through data obtained through WRIS. Language in the WRIS agreement limited use of this data to DOL programs, which meant that when reporting a customer such as the one in this example, the customer would count positively in the WIA Adult performance but count negatively in the SNAP E&T performance. This undermines the idea of an integrated system where the focus should first be on how well the system served the

customer; each program that helped support the outcome should be able to report that success.

In addition, while WIOA provides for a set of performance measures, they are by no means the only such method to measure success. Indeed, with their extensive lag, states need the ability to develop and use leading indicators to improve program monitoring and management. In addition, states need the ability to evaluate employment/wage data to measure system and program impact and return on investment. Heretofore, the WRIS agreement's language prohibited this extremely important activity as well.

However, WIOA §116(i)(2) provides that the Secretary of Labor shall provide access to wage data from other states to the extent that this data is necessary to carry out the state plan or the annual report prescribed by WIOA §116(d), and WIOA §116(e) requires the state in coordination with the Boards to conduct ongoing evaluations of activities carried out by the state. Therefore, as noted, TWC intends to use data obtained through WRIS to evaluate system and program performance through a variety of federal and state-developed performance measures, as well as to evaluate system and program impact and return on investment.

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.

TWC administers and enforces many state and federal laws covering various workforce-related privacy issues. These laws are intended to set high standards for performance and customer satisfaction. TWC's compliance includes legislation that addresses §444 of the General Education Provisions Act: family educational and privacy rights, and other applicable federal laws.

In particular, TWC supports an internal control structure and written policies that provide safeguards to protect personally identifiable information (PII) from an education record, and other information that is readily or easily exchanged in the open market or considered to be sensitive. Confidentiality is specifically maintained for student-identifying information received by TWC from career schools or colleges, or any other school, business entity, or educational institution that TWC reviews. Violating the confidentiality of this information is a Class-A misdemeanor offense.

TWC's compliance is facilitated by such resources as the Texas Educating Adults Management System (TEAMS), the data management system for federally-funded Adult Education and Literacy programs in Texas. TEAMS' access is limited to people who work for an adult education and literacy grant recipient or subrecipient and have satisfactorily completed Family Education Rights and Privacy Act (FERPA) training provided by TWC.

In addition, TWC electronically publishes its guidelines to protect the security and confidentiality of customers' PII to which Boards and other TWC grantees must adhere.

The below webpage also provides links to further guidance to ensure Boards and other TWC grantees safeguard customers' confidential PII.

Employment Service Guide - E-200: Security of Personal Identity Data

http://www.twc.state.tx.us/employment-service-guide-e-200-security-personal-identity-data

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.

Texas is home to 1.68 million veterans, the second largest veteran population in the nation. TWC is using the newest workforce development strategies and initiatives to expand services for veterans and spouses of veterans.

Priority of Service for Veterans

Texas Workforce Solutions has always provided priority of service for eligible veterans and eligible spouses in all DOL-funded programs. Additionally, the Texas legislature mandated priority of service for eligible veterans and eligible spouses in all state-funded workforce services.

The Subrecipient Monitoring department maintains a risk assessment methodology for monitoring local Board activities, and priority of service for veterans is included in the items that are applied to this methodology. Monitoring activities generally include on-site visits, interview with staff, and regular reviews of local Board policies related specifically to priority of service for veterans.

Priority of service means the right of veterans to take precedence over non-veterans in obtaining workforce services. Taking precedence means that veterans receive access to workforce services before non-veterans. If workforce services are limited, veterans receive access to workforce services instead of or before non-veterans.

Texas Workforce Solutions ensures the requirements for priority of service apply to all workforce service programs funded in whole or in part by the U.S. Department of Labor Employment and Training Administration or state funds. Priority of service for veterans applies to the following three categories of qualified job training programs:

- Universal access programs (e.g., Wagner-Peyser-funded services) that deliver services as a whole and that do not target specific groups;
- Discretionary targeting programs (e.g., Workforce Innovation and Opportunity Act-funded services) that focus on certain groups but do not specifically mandate that target groups be served before other eligible individuals; and
- Statutory targeting programs (e.g., Temporary Assistance for Needy Families-funded services, TANF) that are mandated by federal law to provide priority or preference to certain groups.

Veterans and eligible spouses are:

- identified at the point of entry;
- informed of their right to priority of service; and
- informed of the full array of employment, training, and placement services available and any applicable eligibility requirements for those programs and services.

Priority of service is then applied in the following order:

- Veterans and eligible spouses who meet the mandatory priorities or spending requirement or limitation must receive the highest priority for the program or service;
- Non-veterans within the program's mandatory priority or spending requirement or limitation must receive priority for the program or service over eligible veterans outside the program-specific mandatory priority or spending requirement or limitation; and

Veterans and eligible spouses outside the program-specific mandatory priority or spending requirement or limitation must receive priority for the program or service over non-veterans outside the program-specific mandatory priority or spending requirement or limitation.

In Texas, the Jobs for Veterans State Grants are administered by the Texas Veterans Commission (TVC). DVOP and LVER staff are housed in Workforce Solutions Offices with Board workforce service provider staff and Wagner Peyser Employment Services staff. TWC, TVC, and the Boards work closely to ensure veterans are given priority and the services they have earned.

Texas' job matching system, WorkInTexas.com, has a number of features specifically tailored to serve veterans, including the following:

- A two-day hold on all newly created job postings—these jobs are available only to veterans for the first two days they are available to ensure veterans get first review;
- The ability of employers to designate a job posting for Veteran Applicants Only;
- Notification to veterans of their priority of service entitlement, by e-mail or mail upon completing registration in WorkInTexas.com;
- A web "widget" that can be placed on any website and that acts as another front door into the existing WorkInTexas.com job matching system, specifically tailored to returning veterans, such as:
    - Flags that identify veteran job seekers to employers; and
    - Job search options for veterans, including searching for Veteran Only postings and federal contractor postings.

Additionally, WorkInTexas.com links with US.jobs to ensure federal contractors' job listings are in compliance with federal jobs under the Veterans Act and to provide veterans with as many quality job opportunities as possible through the state labor exchange.

In addition, Senate Bill 389, 84th Texas Legislature, Regular Session (2015), requires that state agencies include relevant Military Occupational Specialty (MOS) codes on all jobs

posted in WorkInTexas.com. The State Auditor's Office (SAO), in conjunction with TVC, has developed a State Classification-to-MOS crosswalk that is available to state agencies at http://www.hr.sao.state.tx.us/Compensation/JobDescriptions.aspx. This reference list is on SAO's website so state agencies can now easily look up state classification titles, note related MOS codes, and include those MOS codes on postings in the job description.

Significant Barriers to Employment

A veteran or eligible spouse is determined to have a significant barrier to employment if he or she meets at least one of the following:

360. Disabled veteran, as defined in 38 USC §4211(1) and (3);
361. Homeless, as defined in 42 USC §11302(a) and (b);
362. Recently separated service member, as defined in 38 USC §4211(6), who in the previous 12 months has been unemployed for 27 weeks or more;
363. Offender, as defined by the Workforce Innovation and Opportunity Act (WIOA) §3(38), who is currently incarcerated or who has been released from incarceration;
364. No high school diploma or equivalent certificate; or
365. Low income, as defined in WIOA §3(36).

A veteran or eligible spouse identified as having significant barriers to employment is immediately referred to DVOP staff. When DVOP staff is not available, Workforce Solutions Office staff must provide or arrange for services to be provided.

Wagner Peyser Employment Services staff, WIOA staff, or other Workforce Solutions Office staff provide services to veterans and eligible spouses who have been determined:

- to have significant barriers to employment, but for whom no DVOP staff is available to provide services; or
- to not have significant barriers to employment.

Boards screen individuals seeking services, whether in person or via telephone call, to determine if they are veterans or eligible spouses and determine if they are eligible for services from DVOP staff.

The following active duty service members or Transitioning Service Personnel are eligible for DVOP services:

- Service members who have not met Career Readiness Standards and who can provide a Form DD-2958 signed by their commander;
- Transitioning service members ages 18-24; and
- Active duty service members being involuntarily separated through a service reduction-in-force.

When screening individuals to determine their veteran status, Workforce Solutions Office staff:

- determines the purpose of the visit or telephone call;

- explains that the purpose of the triage tool is to determine which staff are best suited to assist them;
- ensures customers identify whether or not they are veterans or eligible spouses; and
- ensures that veterans and eligible spouses confirm whether any of the significant barriers to employment criteria or the Secretary's priority category apply.

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.

Achieving excellence in accessibility is based on three core principles:

- ensuring that all customers can effectively use workforce products and services;
- creating a workspace accessible for individuals with disabilities; and
- complying with all federal and state legal requirements.

Electronic and Information and Resources

TWC puts principles into practice by making its websites and other electronic and information resources (EIR) accessible and its content user friendly for individuals with disabilities, including members of the public and TWC employees, pursuant to Title 1, Texas Administrative Code, Chapters 206 and 213. WorkInTexas.com, TWC's public online job matching system, is tested for compliance upon all updates to the system using the most updated Job Access With Speech (JAWS) software.

Additionally, TWC employs an EIR accessibility coordinator to serve as a contact for EIR accessibility concerns. The coordinator both monitors agency-wide compliance with accessibility policy and facilitates correction of noncompliant EIR. To these ends, the coordinator partners with accessibility-designated liaisons in each business area. An accessibility liaison functions as the primary contact for the business area's compliance with EIR accessibility requirements. The liaison also assists in staff development, addressing the needs of individuals with disabilities, as well as in sharing TWC's accessibility goals and requirements.

Other agency efforts to achieve excellence in accessibility include:

- providing staff regular classroom training sessions on a range of accessibility topics;
- developing and maintaining an inventory of all agency EIR;
- consulting on accessibility purchases and facilitating the exception request process;

- working with business areas to develop and implement remediation plans for non-compliant websites, applications, and products, and consulting as needed during remediation;
- developing Intranet pages with accessibility resources for employees; and
- meeting regularly with accessibility liaisons.

Accessibility at Workforce Solutions Offices and TWC-Owned Buildings

The TWC Equal Opportunity (EO) Unit functions within the Subrecipient and Equal Opportunity Monitoring Department. The EO Unit monitors recipients of WIOA Title I financial assistance to determine compliance with the nondiscrimination and equal opportunity provisions of WIOA §188. Both programmatic and physical accessibility are addressed during an EO compliance review.

As recipients of WIOA funding, Boards are monitored on-site based on a three-year rotation schedule, as referenced in the State Methods of Administration (MOA) maintained on file with DOL's Civil Rights Center (DOL-CRC). All 28 Boards are scheduled for an EO review within a designated three-year period. Dates for EO monitoring reviews generally align with those of the TWC's annual Board monitoring review.

In determining which sites are selected for physical accessibility reviews, current Workforce Solutions Offices lists will be cross-referenced with the database of Workforce Solutions Offices previously reviewed by state-level staff. The EO manager will conduct a risk assessment in selecting locations for physical accessibility reviews based on the following criteria:

- the location was not previously reviewed by TWC staff based on historical review data;
- the location was not reviewed by TWC staff during the tenure of the current Board EO Officer; and/or
- the location reflected numerous deficiencies in the previous EO review, thus warranting a follow-up review by TWC.

On a case-by-case basis, the EO manager can defer physical accessibility reviews in a given Board area with sufficient justification.

An EO accessibility monitoring survey is used, outlining all compliance requirements within the following categories:

- Parking and passenger loading zones
- Ramps
- Accessibility routes
- Entrances and doors
- Building signage
- Controls and operating mechanisms
- Drinking fountains and watercoolers
- Elevators
- Toilet rooms
- Fixed or built-in seating, tables, and counters

- Telephones
- Auxiliary aides (available upon request)

TWC's Training and Development Department (T&D) has developed an array of curricula specific for the workforce system, including a comprehensive seven-hour course, titled "Access for All," tailored to Workforce Solutions Offices staff, and providing comprehensive instruction on serving individuals with disabilities. This training focuses on the basics of the Americans with Disabilities Actand the Rehabilitation Actand how to apply the rules and regulations in Workforce Solutions Offices.

Topics covered include:

- basic facts, myths, rights, and etiquette guidelines for dealing with customers with disabilities;
- helping customers with disabilities in a Workforce Solutions Office environment;
- resources and funding sources for support services and employment accommodations; and
- the effects that employment may have on Social Security disability benefits.

9. ADDRESSING THE ACCESSIBILITY OF THE ONE-STOP DELIVERY SYSTEM FOR INDIVIDUALS WHO ARE 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.

TWC puts principles into practice by making its websites and other electronic and information resources (EIR) accessible and its content user friendly for individuals with Limited-English Proficiency (LEP). WorkInTexas.com, TWC's public online job matching system, is available to job seekers in both English and Spanish. TWC's website also has information available in Spanish regarding unemployment insurance, unemployment benefits, labor law, employment discrimination, housing discrimination, and TWC press releases.

TWC require that Boards ensure all individuals with Limited English Proficiency (LEP) have equal opportunity and access to all federally-funded workforce services, including those funded under WIOA, TANF, Choices, and SNAP E&T.

Boards must review WIOA's nondiscrimination and equal opportunity regulations that prohibit discrimination, and specifically the requirements to:

- provide information in languages other than English, and ensure access to persons with LEP to WIOA services on an equal basis with those proficient in English; and
- ensure that communications with individuals with disabilities are as effective as communications with individuals without disabilities.

Boards must comply with the following four requirements to ensure "meaningful language access":

- A thorough *assessment* of language needs, including the identification of language needs of each LEP individual; situations in which the individual will need language services; resources needs; and how to make these resources available;
- A comprehensive *written policy* to ensure meaningful communication with LEP individuals. This includes notices to LEP individuals of their rights to free language assistance; staff training; monitoring; and translation of written materials. The guidance warns that the use of family, friends, and/or minor children as interpreters can raise Title VI liability issues;
- *Training staff* to implement the language access policy. At a minimum, staff must be able to recognize potential disabilities and conduct initial screenings to identify possible disabilities for individuals who agree to be screened. Boards must ensure that service providers and those entities to which a referral is made have the requisite training and knowledge; and
- *Vigilant monitoring* to ensure that LEP individuals can access services.

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.

Plan Development

Texas seeks ongoing avenues to solicit input into the development and enhancement of the workforce service-delivery system.

The Texas Workforce Commission (TWC) has several established mechanisms for communicating with and seeking input from the 28 Local Workforce Development Boards (Boards). TWC regularly consults with the Texas Association of Workforce Boards, an organization composed of Board members and Board staff. Additionally, TWC conducts biweekly conference calls to discuss relevant issues with the Boards. Additional conference calls are arranged to provide an opportunity for an expanded discussion and to receive input on specific issues.

Texas employers also have multiple opportunities to offer TWC input regarding the Texas workforce system, including attending the Texas Business Conference and providing feedback directly to TWC:

- TWC's Commissioner Representing Employers hosts the conference, which addresses employer workplace issues and is held 15 to 17 times a year in communities across the state. Since 1998, the conference has drawn in more than 37,000 Texas employers. At each conference, Board staff and contractors are invited to participate and interact directly with the attendees.
- The Employer Commissioner's Office solicits feedback from employers through its newsletter, *Texas Business Today*,distributed quarterly to over 100,000 employers.

TWC organizes and sponsors the Annual Texas Workforce Conference and the Workforce Forum each year, allowing information sharing regarding all aspects of workforce and economic development. Approximately 1,000-1,200 participants attend the conference, and approximately 200 participants attend the forum. These events are a valuable tool in promoting ongoing dialogue among TWC, the Boards, and other Texas workforce system partners.

TWC's Commissioner Representing Employers and Commissioner Representing Labor both have toll-free telephone numbers, which encourage the exchange of information regarding workforce issues. TWC's user-friendly website, with e-mail links and telephone numbers relating to topics of customer interest, encourages the continued exchange of information.

Additionally, a series of seven public meetings across the state regarding Workforce Innovation and Opportunity Act (WIOA) plan development and the transition of Vocational Rehabilitation (VR) services from the Texas Department of Assistive and Rehabilitative Services (DARS) to TWC were conducted from July through September 2015. These meetings allowed for valuable input from stakeholders on both topics. Locations included Austin, Dallas, McAllen, Houston, Tyler, Lubbock, and El Paso. In addition to the comments received addressing workforce planning elements, there were many commenters who

provided input on the upcoming transition of vocational rehabilitation to TWC. A summary of those comments may be found in Appendices 2 and 3.

All input was considered in the development of the strategies outlined in this Combined State Plan for the Workforce Innovation and Opportunity Act of 2014 (state plan), as well as in the development of TWC rules and policies.

At TWC's November 3, 2015, public meeting, the draft state plan was approved for public comment and posted on TWC's website.

The Board chairs and executive directors were notified of the date that the state plan public comment period would end. The Board executive directors were asked to notify chief elected officials (CEOs), Board members, and other stakeholders of the state plan and the dates of its public comment period. Additionally, TWC provided notification of the state plan's public comment period to the Texas Workforce Investment Council. The draft state plan also was discussed with the Board executive directors and other Board and contractor staff during a scheduled biweekly conference call.

Public Comment

TWC provided a 30-day public comment period from March 9 to April 9, 2018.

No public comments were received during that period. However, TWC continues to accept comments through May 15, 2018, which is the final public meeting allowing the public to provide input on the CSP.

On April 27, 2018, TWC held a conference call with Local Workforce Development Boards. A number of Boards provided comment on the challenges with identifying and serving out-of-school youth (OSY) in rural communities. Based on this comment, TWC has modified the waiver request on the OSY expenditure requirement to include additional justification.

TWC hosted stakeholder meetings to provide the public with additional opportunity to provide comment on this plan modification. These stakeholder meetings took place as follows:

- April 26,2018 - Houston
- May 3, 2018 - El Paso
- May 15, 2018 - Fort Worth

No public comments were received as a result of these meetings.

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that—

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

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

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

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

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

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

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

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

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

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

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

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

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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

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

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

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

1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

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

The governor approved requests for initial designation from all 28 workforce areas in Texas.

On January 30, 2017, the governor approved the redesignation of the Alamo and Coastal Bend workforce development areas. McMullen County, which was previously part of the Coastal Bend workforce area, is now in the Alamo workforce area.

The following map depicts the 28 workforce areas.

http://www.twc.state.tx.us/partners/workforce-development-boards-websitestexasWorkforceDevelopmentBoardWebsites

1. Panhandle

2. South Plains

3. North Texas

4. North Central Texas

5. Tarrant County

6. Greater Dallas

7. Northeast Texas

8. East Texas

9. West Central Texas

10. Upper Rio Grande

11. Permian Basin

12. Concho Valley

13. Heart of Texas

14. Capital Area

15. Rural Capital

16. Brazos Valley

17. Deep East Texas

18. Southeast Texas

19. Golden Crescent

20. Alamo

21. South Texas

22. Coastal Bend

23. Lower Rio Grande Valley

24. Cameron

25. Texoma

26. Central Texas

27. Middle Rio Grande

28. Gulf Coast

The Commission recognizes Texas' current workforce areas as their own independent regions.

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.

TWC achieves the vision and goals enumerated in this plan by using an integrated approach that respects the primacy of Texas Workforce Solutions.

Background

As previously mentioned, in 1993, the Texas legislature passed Senate Bill 642, the Workforce and Economic Competitiveness Act (Act), transforming the state's fragmented workforce development system into an integrated service delivery network and improving the quality and effectiveness of services. At the time of the Act, Texas comprised 35 Service Delivery Areas set forth under the federal Job Training Partnership Act of 1982.

The 1993 Act required TWIC to recommend designation of workforce areas in the state, the first step in establishing a system for delivering a slate of integrated services, from

workforce training to the TANF and SNAP E&T programs, community services, and the basic labor exchange system.

The Act further provided that a workforce area must be composed of more than one contiguous unit of general local government, including at least one county, and that the area be of sufficient size to have the administrative resources necessary to effectively plan, manage, and deliver workforce development services. Other factors considered included economic development needs of the area, analyses of local labor markets, commuting patterns of residents, and community needs, including those of employers seeking skilled workers and individuals seeking jobs and skills training.

The Act required that the local elected officials reach agreement on the designation for a workforce area. After much analysis and deliberation, including significant public input, and the recognition that even contiguous areas often have very diverse needs, 28 workforce areas—governed by Boards—were identified and designated by the governor. The realignment from 35 to 28 workforce areas supported Texas' vision of an integrated and streamlined workforce system, a precursor to the purposes of WIOA.

In 1998, Congress passed WIA. Recognizing that Texas previously established the framework of an integrated workforce system, WIA provided for a number of grandfather provisions, which allowed Texas to continue certain provisions under prior consistent state law. One of these provisions was specific to the designation of workforce areas. This provision allowed Texas' Boards to continue as long as they performed successfully and maintained sustained fiscal integrity.

Local Area Designation

WIOA includes the same provision as WIA, allowing existing Boards to continue as long as they perform successfully and maintain sustained fiscal integrity. Units of local government or grant recipients that request, but are not granted designation or redesignation (in accordance with TWIC rules §901.1) as a local workforce development area, may appeal in accordance with the state's written policy and procedure described in TWIC rule §901.2 (40 TAC Part 22).

The governor must approve a request for initial designation as a workforce area from any area that: (a) was designated as a workforce area for purposes of WIA for the two-year period preceding July 22, 2014; (b) performed successfully; and (c) sustained fiscal integrity. The governor may choose to approve a request for initial designation as a workforce area from any area that does not meet the above criteria.

Compliant with WIOA §108, each Board develops and submits to the governor a comprehensive four-year local plan in partnership with the chief elected official (CEO). Texas Government Code §2308.304(b) also requires each Board to develop a local plan with goals and objectives that are consistent with statewide goals, objectives, and performance standards. State and federal law require TWIC to review local plans and modifications and make recommendations to the governor for approval.

Regions

WIOA requires states to identify regions in the state. WIOA's intent regarding regional identification is for locals to engage in regional efforts that result in the analysis of the

regional labor market, establishment of regional service strategies, development and implementation of sector initiatives for in-demand industry sectors or occupations for the region, and the coordination of services with regional economic development needs.

TWC agrees with these expectations, and has complied with WIOA's requirements.

Long before a federal requirement existed, Boards across Texas had a demonstrated history of collaboration beyond the designated workforce areas. These regional collaborative efforts have resulted in workforce system leaders partnering to align workforce policies and services with regional economies and supporting service delivery strategies tailored to these needs. A few examples of regional collaboration include:

- Border Workforce Alliance, comprising five Boards covering the Texas/Mexico Border: Cameron County, Lower Rio Grande Valley, South Texas, Middle Rio Grande, and Borderplex. These Boards have partnered on two DOL grants within the last few years (STEM, $2,000,000, and Project GROW, $5,999,998).
- The Cameron County, Coastal Bend, and South Texas Boards collaborate regionally on the Future of the Region South Texas group, the efforts of which extend beyond the workforce and include the region's local governments, infrastructure, health care system, education, and economic development.
- Five Boards—Alamo, Coastal Bend, Golden Crescent, Middle Rio Grande, and South Texas—work collaboratively to support the needs of the oil and gas industry in the Eagle Ford Shale area.
- The Capital Area Board has participated in the Accelerating Connections to Employment (ACE) National Evaluation study, funded by DOL's Workforce Innovation Fund. ACE is driven by a consortium of nine workforce investment boards, ten community colleges, and employer partners across four states, tasked with reducing poverty by linking education, training, and workforce services to create skill-building opportunities and career pathways for low-skilled, low-income individuals.
- The Capital Area, Alamo, Central Texas, Greater Dallas, Heart of Texas, North Central Texas, Rural Capital Area, and Tarrant County Boards are members of the I-35 Initiatives Consortium. The consortium was founded in 2010 to establish a multiregional coordinated strategy for meeting the recruitment and skill training needs of businesses in the life sciences cluster, with an emphasis on health care and bioscience. The consortium represents 46 percent of Texas' residents located in the 51 counties that span from San Antonio to Dallas-Fort Worth.
- Additionally, the Greater Dallas, North Central Texas, and Tarrant County Boards have created the Dallas/Fort Worth Regional Workforce Leadership Council (RWLC), the driving force for a cooperative approach to promoting the region's strongest industries and supporting the region's key clusters. RWLC works to meet industries' needs through the collaboration of the Boards with chambers of commerce and business leaders.
- The Rural Workforce Network (RWN) Consortium Biotechnology/Life Sciences-Medical Targeted Industries Project was designed to further build capacity to meet the skills readiness and skills training needs of employers and job seekers in the RWN region, through an understanding of employers' needs, assessments of job seekers' skills, and the creation and credentialing of a work-ready workforce. Five

Boards—Concho Valley, West Central Texas, Permian Basin, North Texas, and South Plains—four employers, and nine public colleges participated in this project.

- The Concho Valley, Permian Basin, and West Central Texas Boards collaborated on supporting the needs of the oil and gas industry in the Permian Basin/Cline Shale areas.
- As many Texas Boards share labor sheds with adjacent states, these Boards find it beneficial to establish partnerships with out-of-state partners to create a regional response to workforce and economic challenges. The Texoma Board partners with the Southern Oklahoma Workforce Board, Southeastern Oklahoma State University, and several other key organizations in Oklahoma to form the Texoma Regional Consortium, which covers a 13-county region along the Texas and Oklahoma borders. The Texoma Regional Consortium addresses needs of local business and industry in both Texas and Oklahoma through participating in strategic planning to identify key regional strategic themes, develop regional labor market analysis, sponsor regional job fairs, and participate in other joint ventures to address workforce and economic challenges.
- Multiple Boards across the state have partnered with each other to respond to disasters, such as Hurricane Katrina and the West, Texas, fertilizer plant explosion, leveraging resources to help support those most in need.

Development and implementation of the above regional collaborations were based on analysis of labor markets, industry needs, and the needs of economic development entities. These efforts have enhanced and continue to enhance both the capacity and performance of the Texas workforce system.

Texas' Boards are currently accomplishing WIOA's expectations. Formal assignment in Texas of new regions and the associated requirements for the development of a regional plan and the establishment of respective performance targets will not further WIOA's purposes. In fact, a formal designation of two or more Boards as a new region may reduce potential collaboration efforts outside of those geographical boundaries. This would likely have the opposite effect envisioned in WIOA.

In Texas, local leadership—CEOs, Boards, and Board staff—has long championed regional planning, particularly in developing opportunities in in-demand industry sectors and occupations. In light of Texas' strong partnership efforts and history of working to strengthen regional economies, the formal designation of new regions portend the unintended consequences of restricting the flexibility and innovation that make Texas a national leader in workforce development.

Texas has a proven history of supporting and encouraging regional planning and service delivery efforts. The benefits from regionalism include collaborative planning, pooling and leveraging of resources, capacity building, and ensuring that services can be delivered in the best possible way—regionalism is essential to the Boards' mission. However, it is important that regionalism not be hampered by the designation of artificial boundaries.

Regional planning must be allowed enough flexibility to occur around activities and issues when and where it makes sense. Regional planning activities should be identified and encouraged, perhaps even rewarded, but they should not be defined to the point that they

become a barrier to effective partnerships. As such, the Commission recognizes Texas' current workforce areas as their own independent regions.

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

WIOA includes the same provision as WIA, allowing existing Boards to continue as long as they perform successfully and maintain sustained fiscal integrity. Units of local government or grant recipients that request, but are not granted designation or redesignation (in accordance with TWIC rules §901.1) as a local workforce development area, may appeal in accordance with the state's written policy and procedure described in TWIC rule §901.2 (40 TAC Part 22).

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

TWC will issue its policy on the requirements for funding infrastructure costs in a WD Letter. In part, the WD Letter will state that Boards, with the agreement of CEO's, must develop and enter into memoranda of understanding (MOUs) with statutorily required one-stop partners for operation and funding of a one-stop delivery system in the local area. Boards may also enter into MOUs with other optional partners, as described by WIOA. Among several required provisions, the MOU must include a final plan, or an interim plan if needed, on how the infrastructure costs of the one-stop centers will be funded.

The WD Letter also will state that if a one-stop partner appeals to the state regarding infrastructure costs and the appeal results in a change to the one-stop partner's infrastructure cost contributions, the MOU must be updated to reflect the final one-stop partner infrastructure cost contributions.

The appeals process established by the Texas governor specifies that no later than August 1, 2016 (and every succeeding program year, as applicable), a one-stop partner may appeal a governor's determination regarding the one-stop partner's portion of funds for one-stop infrastructure costs.

- The appeal must be submitted to TWIC in writing or electronically on the TWIC website (or TWC website). The appeal must be signed/submitted by the chief executive officer of the one-stop partner submitting the appeal. The appeal must specify the circumstances and details of the appeal.
- The appeal may be made only on the ground that the governor's determination is inconsistent with proportionate share requirements in NPRM §678.735(a), the cost contribution limitations in §678.735(b), or the cost contribution caps in §678.735(c).

TWIC will consider and rule on the appeal in writing not later than September 30, 2016 (and every succeeding program year, as applicable).

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 Policies

The state makes information on state-imposed requirements—such as guidance for the statewide workforce development system, including policy for the use of state funds for workforce investment activities—available to the public.

The following materials are readily accessible through the TWC website:

- WIOA - overview, implementation, guidance, service and stakeholder input

  http://www.twc.state.tx.us/files/jobseekers/workforce-innovation-and-opportunity-act-guidelines-for-adults-dislocated-workers-and-youth-twc.pdf

- Current TWC rules, as codified in the Texas Administrative Code, Title 40, Part 20, as well as information on past rule amendments

  http://www.twc.state.tx.us/partners/texas-workforce-commission-rules

- All active workforce policy issued through guides, Workforce Development (WD) Letters, Adult Education and Literacy (AEL) Letters, and Technical Assistance (TA) Bulletins http://www.twc.state.tx.us/partners/workforce-policy-guidance
- Reports, plans, and publications: Agency strategic plans and annual reports, publications for employers and job seekers, and program plans and reports http://www.twc.state.tx.us/partners/reports-plans-publications

The following vocational rehabilitation materials are readily accessible through the Texas Department of Assistive and Rehabilitative Services (DARS) and HHSC websites:

- New or modified policies and procedures communicated through policy circulars and bulletins

  http://www.hhsc.state.tx.us/news/CircularsBulletins.shtml

- Current HHSC rules, as codified in the Texas Administrative Code, Title 1, Part 15 http://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=3&ti=1&pt=15
- Reports and plans of DARS' programs http://www.dars.state.tx.us/reports/index.shtml

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

In August 2015, the Commission approved a portion of the governor's reserve and state leadership funds for a number of statewide initiatives to address WIOA's focus on workforce integration, quality improvement, capacity building, professional development,

internships, externships, and more. The initiatives apply across the following programs and services.

Adult Education and Literacy

AEL Local Performance Quality Improvement Funds

The Local Performance Incentive Funding supports Adult Education and Literacy (AEL) grant recipient project performance and innovation through dissemination of information about models and proven or promising practices within the state awards. Local performance quality improvement funds will support the quality of and improvement in local performance of college integration, Board integration, and employer partnerships.

Workforce Development Integration Initiative

The purpose of the workforce and adult education integration initiative is to increase engagement opportunities between Boards and AEL grant recipients and their providers. Boards will use the strengths, weaknesses, opportunities, and threats analyses and solution strategies developed during the 2015 regional workforce and adult education integration initiative meetings to lead policy and procedural enhancement efforts that incorporate integration of AEL objectives into Board strategic initiatives, employer engagement, and contractor procedures.

Accelerate Texas

The Accelerate Texas initiative builds Texas' capacity to expand, develop, and implement Integrated Education and Training (IET) models focusing on Career Pathways service approaches that include Career and Technical Education (CTE). Accelerate Texas is a brand developed by the THECB and jointly expanded with TWC in 2013.

Pell Grant Ability to Benefit Capacity Expansion

Federal guidance has recently been issued regarding a partial restoration of "Ability-to-Benefit" provisions for students to qualify for Pell Grant funds. Ability-to-Benefit students lack a high school diploma or equivalency but qualify for Pell Grants by demonstrating their capacity to succeed in higher education. This initiative builds the capacity of community colleges to implement the new Pell guidance on Ability to Benefit, which could include:

- deployment of customized referral, assessment, admissions, and student aid process for workforce, AEL, and other individuals to Pell-eligible Career Pathways programs;
- deployment of Pell-eligible Career Pathways training and AEL programs; and
- other demonstrated activities to implement student enrollment in community college career pathways programs by fall of 2016.

Student Support Call Center

The purpose of the Student Support Call Center is to support AEL students with a focus on high school equivalency mathematics instruction. The call center will operate within the infrastructure of TWC's call center phone system and will be staffed by individuals trained to provide remote mathematics support. In addition to phone support, call center staff will

use online tutoring software to provide visual support to students as they work through questions.

Given Texas' diverse mix of student populations, TWC also funds a growing range of other professional development (PD) initiatives, including the following.

Professional Development Center

A statewide support system for AEL grant recipients and service providers, Boards, and community- and faith-based organizations engaged in AEL services. The Professional Development (PD) Center offers:

- data-driven, research-based PD support and training;
- searchable online database for statewide recruitment and data management of PD contract trainers;
- on-demand and/or hybrid-format curricula and course content;
- learning management system for PD courses;
- recruitment, registration, logistics, documentation, and management services for PD events;
- statewide purchasing of PD services, materials, and other related resources; and
- statewide and local needs research and analyses aimed to improve local performance and spur innovation.

AEL-Provider Distribution to Support Professional Development

An approach that gives AEL-grant recipients flexibility to acquire PD support relevant to local needs. PD funds can be used by providers for local training contracted through the statewide contract trainer database, and for a coordinator to assist in aligning PD to a program's goals.

Focus on the Basics Reading and Math

This initiative focuses on research and development to expand best practices by Texas community colleges for remedial and advanced education services in skills necessary for adults transitioning to college and career.

Career Pathways Expansion

This initiative is an effort to enhance capacity for implementing integrated education and training models under the Accelerate Texas brand across adult education and literacy systems. Funds support mentoring services, replicable resources, such as administrative procedures and tools, as well as recruitment, outreach screening, and assessment and service delivery materials, case management guidelines, and curricula.

Professional Development for Nonprofit Adult Literacy Organizations

Professional development services for tutors, instructors, program administrative staff, and trainers of nonprofit adult literacy organization. Services include training for literacy volunteer management, low literacy instruction/tutoring, and development of partnerships to benefit AEL grant recipients.

Adult Education Standards Update

An effort to update and align Adult Basic and Adult Secondary Education and English Language Acquisition standards and benchmarks with the Texas College & Career Readiness Standards (CCRS), the Texas Certificate of High School Equivalency test, and the Texas Success Initiative Assessment (TSIA).

Leadership Excellence Academy

A program to build leadership capacity within AEL local-grantee management, for which TWC funds participation by AEL grant recipients to earn a Manager of Program Improvement certificate.

Learning Management System

A platform for managing AEL professional development registration and documentation and house training materials, coupled with on-demand courseware and virtual interactive training.

Child Care

Professional Development for Early Childhood Education

The Texas legislature directs TWC to dedicate $500,000 each year of the biennium for programs that encourage increased participation in continuing professional development for early childhood professionals. On August 11, 2015, the Commission approved the funding of the Professional Development Scholarship Program for Early Childhood Professionals. This program assists eligible providers to work toward certification to become a Texas Rising Star (TRS) provider by meeting Criterion III Caregiver Staff Qualifications.

Employment Services

Hiring Red, White and You! Veterans Job Fair

TWC will host the fourth annual Hiring Red, White and You! (HRWY) statewide job fair on November 12, 2015. In cooperation with 28 Boards, HRWY connects Texas veterans and their spouses with Texas employers that value the experience, discipline, and other exceptional qualities inherent with a military background. In the first three years, HRWY has connected more than 31,000 veterans with over 4,700 employers.

Workforce Employment and Training Activities—Fast Start

The Texas Fast Start program is a fast-track and affordable certification program in high-demand fields identified by local employers. The program is designed to use competency-based learning methods that allow students to advance toward a degree or certification as they master skills instead of following traditional credit-hour schedules. TWC will award grants for the expansion or creation of fast-track or dual credit programs.

Skills Development

Dual Credit

The purpose of the TWC Dual Credit initiative in FY 2016 will be to support New CTE-ECHS (Career and Technical Education Early College High School) programs, with priority given for projects that include an internship component.

SNAP

Partnership with Local Food Banks

One of TWC's goals for FFY 2016 is to build stronger partnerships with local communities and private nonprofit sectors. Specifically, TWC will use SNAP E&T administrative funds to implement an initiative that will encourage Boards to strengthen partnerships with local food banks in the workforce areas to market the SNAP E&T program to potential SNAP E&T volunteers (i.e., exempt recipients) who visit food bank facilities. Additionally, the administrative funds may be used to refer mandatory work registrants who visit food bank facilities to Workforce Solutions Offices for SNAP E&T.

WIOA

College Credit for Heroes

The College Credit for Heroes (CCH) program seeks to maximize college credits awarded to veterans and service members for their military experience by developing streamlined degree paths and workforce certifications to expedite transition into the Texas workforce.

Teacher Externships

The statewide externship program allows middle school and high school teachers and counselors to engage in activities in a particular industry and learn how classroom content can be applied in the workplace. The externship will inform teachers on the skill sets required for a given industry, and teachers can then inform, educate, and guide students to industries that match their skill sets. Connecting classroom content to the real world and workplace will help students understand and develop the academic and technical skills they need to enter the workforce. Partnerships will include workforce-area businesses in the growing fields of advanced manufacturing; energy production; bioscience/biotechnology; health care; law enforcement; space exploration; logistics; food processing; contact centers; information technology; local government; oil and gas extraction; mining; warehousing and storage; and construction. A total of $558,079 in grant funds was awarded to eight Boards. These Boards are anticipating serving a total of 429 teacher participants.

Youth Career Fairs

On July 8, 2014, the Commission approved $700,000 of WIA statewide activity funds for PY 2015 to implement a Youth Career Fairs Program through distribution of $25,000 to each workforce area. The funds are intended to enhance an existing youth career fair hosted by a Board, or develop a new Board-hosted youth career fair.

Texas Wide Open for Veterans

In May 2014, the Commission approved funding to develop an online platform for recruiting veterans to the state by showcasing the jobs and educational opportunities available to veterans in Texas. The site is designed to be a dynamic and informative web experience for soon-to-be and newly separated servicemen and women aimed at recruiting them to stay in or come to Texas after their service is complete. The site went live on December 3, 2014.

Continuing Existing Initiatives

Child Assessments for Individualized Instruction Pilots

In 2014, the Commission approved $2 million in child care funds for professional development and individual instruction pilots. This funding is used to increase the number of pilot sites to implement programs that use tools for individualized instruction and assessment coupled with professional development components that support ongoing learning for teachers. These assessments are intended to provide teachers or caregivers with tools for developing strategies that align classroom instruction with developmental domains and ultimately prepare children to perform well in school.

Child Care Quality Award Conference (Child Care Conference)

This initiative develops Board awards to recognize outstanding child care quality initiatives and encourages the replication of successful initiatives and best practices. The Board awards may focus on categories of quality child care such as consumer education, technical assistance, and professional development. To foster replication and technical assistance in the implementation of best practices, these funds are also be used to support a child care quality award conference to highlight the winning initiatives and promote knowledge sharing. The first conference took place on April 8, 2015.

Employer and Community-Based Organization Partnerships

The 84th Texas Legislature directed TWC to implement a program with community-based organizations (CBOs) in partnership with employers to move Texans off public benefits and into the workforce. In FY 2016-2017, General Revenue funds will be used to implement this program through a competitive Request for Proposals (RFP).

The Women's Institute for Technology Employment Training

The Texas legislature directs TWC to allocate $250,000 in FY 2016 and $250,000 in FY 2017 to the Women's Institute for Technology Employment Training to support comprehensive program with statewide activity funds to develop curriculum, courses, and programs to prepare single women with children who are economically disadvantaged or on state or federal assistance, for entry-level jobs and careers in Texas manufacturing and technology-based industries.

Noncustodial Parent (NCP) Employment Initiative

The purpose of the Noncustodial Parent (NCP) Choices program is to assist NCPs with overcoming barriers to employment and career advancement while becoming economically self-sufficient and making consistent child support payments. NCP Choices is a collaborative effort of the Office of the Attorney General (OAG) of Texas, TWC, Boards, and family court judges.

Foster Youth Transition Center Grants

The purpose of the Foster Youth Transition Center grants is to expand TWC's support of Foster Youth Transition Centers, which provide services and activities to youth transitioning out of foster care. The transition centers provide a comprehensive array of services and referrals to services that help transitioning foster youth overcome barriers they face. Services include workforce services, dropout prevention activities, self-esteem and leadership activities, counseling, and other services to support the healthy development of transitioning foster youth.

Governor's Summer Merit Program

The purpose of the Summer Merit Program (SMP) is to provide scholarships for Texas middle school and high school students between 14 and 21 years of age to increase the number of students served in science, technology, engineering, and math (STEM) skills-related summer camp programs. Students who attend the day or residential camps get information and experience about postsecondary opportunities that lead to STEM careers. The GSMP supports initiatives by the governor to prepare Texas' future workforce to compete for the high-skill, high-demand jobs of the future.

Youth Robotics Initiative

The purpose of the Youth Robotics initiative is to expand statewide participation in robotics programs by developing new competitive robotics education teams of students in grades 9-12 and by supporting existing Texas high school competitive robotics education teams.

Examples of activities include team activities in which students design, program, and build robots under the supervision of a mentor. The mentors, including professional engineers, help students build and program their robots to compete against other teams in regional competitions. The best teams have a chance to qualify to be sent to the world championships. In 2015, TWC funded 38 Texas teams' registration fees that qualified to compete at two world championship events.

Pathways Home-Texas Interagency Council for the Homeless

On June 10, 2014, the Commission approved TANF funds to support the Texas Interagency Council for the Homeless (TICH) as it implements *Pathways Home.* Funds were directed to:

- compiling primary priorities of each continuum of care to identify the most critical needs;
- supporting subcommittees created by *Pathways Home*;
- pursuing a "no wrong door" approach to assisting the homeless or those at risk of homelessness;
- studying ways to increase permanent housing situations for those who are currently homeless or at risk of homelessness;
- data analysis; and
- facilitating and supporting the cost share of a VISTA employee to focus solely on the work of TICH, *Pathways Home,* and the statutory directives of TICH.

Texas Science Careers Consortium (Texas Science and Engineering Fair)

The purpose of the grant is to support the Texas Science and Engineering Fair (TXSEF) hosted by the University of Texas at San Antonio (UTSA) College of Sciences. TXSEF offers a competition for state middle school and high school student science fair winners to showcase their research projects in STEM fields. UTSA manages facilities for TXSEF and conducts activities including the display of student projects, competitions, and awards selection.

Governor's Science and Technology Champions' Academy

The purpose of the Governor's Science and Technology Champions' Academy is to provide a STEM-related one-week residential summer camp. Students in 9th through 12th grades who have a winning project at the Texas Science and Engineering Fair are awarded scholarships to the camp. The teachers who mentored the students were awarded scholarships for a professional development event. This award was not continued after 2013.

Small Business Initiative (Office of the Governor)

The purpose of the Interagency Cooperation Contract is to provide training, information conveyance, and recognition to small businesses, including, but not limited to, those run by veterans, minorities, and women. The intent is to provide businesses with information (based on local and state level input) regarding available workforce-related services, workforce training programs, contracting opportunities, best practices and methodologies, exporting products and services, available governmental services, and any other areas relevant to small business inception and growth.

Veterans Workforce Outreach

The purpose of the Veterans Workforce Outreach program is: (1) to outreach hard-to-serve veterans who are not currently being served through the Workforce Solutions Offices; (2) to address employment barriers faced by hard-to-serve veterans; and (3) to reintegrate hard-to-serve veterans into meaningful employment. Hard-to-serve veterans have one or more barriers to employment, such as homelessness; a history of substance abuse; physical, mental, or learning disabilities; posttraumatic stress disorder; ex-offender status; or recent discharge from military duty.

Veterans Apprenticeship (Registered Apprenticeship Training Program for Veterans and/or Service members)

The Registered Apprenticeship Training Program for Veterans and/or Service members is a program that:

- accelerates participants into or through a DOL Registered Apprenticeship Training Program in Texas (Apprenticeship Training Program); or
- accelerates participants into or through a DOL Registered Pre-Apprenticeship Training Program that leads to enrollment of participants into an Apprenticeship Training Program during the grant period.

Leadership Academy Initiative

In 2015, the Commission approved $145,600 to support a Leadership Academy Initiative for Board staff. This initiative addresses the workforce system's loss of institutional knowledge due to the turnover of executive staff caused mainly by the retirement of baby boomers. Recognizing the critical importance of succession planning—preparing staff with the skills and experience to fill Board leadership roles—TWC created a Leadership Academy based on the recommendation of a Board workgroup.

Apprenticeship

The purpose of the apprenticeship training funds is to supplement the costs of the job-related classroom instruction for eligible DOL Office of Apprenticeship-registered apprenticeship training programs. TWC currently provides funding for the Apprenticeship Training Program through an application process. Funding is generally state GR funds; however, other funding has been added to GR to supplement the program to include WIA, SNAP E&T, and TANF Noncustodial Parent (NCP) funds. From 2010 through 2015, the Commission added up to $1 million each year in WIA funding.

Rapid Response

Rapid response services focus on assistance to area employers, workers, and the community in managing reductions in force. To ensure that Texas is poised to meet the needs of local employers, rapid response services are funded through the Boards' WIOA Adult, Dislocated Worker, and Youth formula programs. The funding stream allows for a prompt rebound from layoffs, as funds are readily and locally available. Texas has also reserved rapid response funds at the state level for Boards that demonstrate a need for additional assistance.

The rapid response system first pursues strategies to avert layoffs, while maintaining capacity to return workers to productive employment as quickly as possible—if the layoff is unavoidable. TWC and Boards use multiple employment and training resources to craft layoff aversion solutions. Past solutions have supported development of incumbent worker programs, which help address employer training needs and avert or mitigate a layoff. Training usually focuses on skills attainment activities.

The second objective of rapid response is reemployment on or before the affected worker's last day of work. Upon notification of layoff, transition efforts are implemented to help dislocated workers engage in employment or training services that facilitate a quick return to work. Layoff notices, including those submitted in compliance with the Worker Adjustment and Retraining Notification Act and Trade Act petitions, are received at the state level and forwarded to Boards by the next business day.

Boards and providers are also responsible for outreach to employers. Board or Workforce Solutions Office staff may use feasibility studies to assess the needs of and options for at-risk companies, as well as offer employment and training activities to address risk factors. Following the initial contact with the employer and worker representatives, an employee information orientation may be conducted on-site and on company time. The orientation typically offers an overview of available services and additional activities that may be conducted onsite. Additional activities include workshops or seminars on the psychology of job loss/stress management, debt/financial management and, specifically, negotiations for debt-payment arrangements, job search skills, and labor market information. The orientation may also provide information on UI and, if appropriate, the Trade Adjustment Assistance (TAA) program.

Workforce Solutions Office staff may establish an on-site career transition center when a layoff involves large numbers of employees from a single employer, and the center is acceptable to company management and labor representatives. Staff will consider such factors as convenience, distance from the employer to the closest Workforce Solutions Office, work schedules of the employees, and time off permitted by the employer to attend the activities.

Workforce areas are also encouraged to engage rapid response staff in the BSUs. Rapid response staff attached to the BSU has access to team resources helpful in matching worker skill sets with company hiring requirements. TWC and the Boards set the stage to assist businesses with future staffing needs by maintaining a positive relationship throughout the layoff process. To this end, the outreach effort highlights both the services available to at-risk employers and those services available once business improves and staff needs rebound.

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.

When businesses close plants or layoff workers due to natural disasters, Workforce Solutions Offices can provide immediate on-site services to assist workers facing job loss, contingent on the gravity of the conditions. Activities are coordinated with various agencies, including the Federal Emergency Management System (FEMA), the Texas Division of Emergency Management, Office of the Governor, Disaster Preparedness, and others. So managed rapid response services provide early intervention assistance designed to transition workers to their next employment as appropriately and as soon as possible.

Additionally, TWC administers Disaster Unemployment Assistance (DUA), which provides unemployment benefits for individuals who lost their jobs or self-employment, or who are no longer working as a direct result of a major disaster. A disaster assistance period must be declared, and individuals who apply must be ineligible for regular unemployment benefits. Assistance may also include offering unemployed individuals new, temporary public service jobs.

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.

Rapid Response

Rapid response services focus on assistance to area employers, workers, and the community in managing reductions in force. To ensure that Texas is poised to meet the needs of local employers, rapid response services are funded through the Boards' WIOA Adult, Dislocated Worker, and Youth formula programs. The funding stream allows for a prompt rebound from layoffs, as funds are readily and locally available. Texas has also reserved rapid response funds at the state level for Boards that demonstrate a need for additional assistance.

The rapid response system first pursues strategies to avert layoffs, while maintaining capacity to return workers to productive employment as quickly as possible—if the layoff is unavoidable. TWC and Boards use multiple employment and training resources to craft layoff aversion solutions. Past solutions have supported development of incumbent worker programs, which help address employer training needs and avert or mitigate a layoff. Training usually focuses on skills attainment activities.

The second objective of rapid response is reemployment on or before the affected worker's last day of work. Upon notification of layoff, transition efforts are implemented to help dislocated workers engage in employment or training services that facilitate a quick return to work. Layoff notices, including those submitted in compliance with the Worker Adjustment and Retraining Notification Act and Trade Act petitions, are received at the state level and forwarded to Boards by the next business day.

Boards and providers are also responsible for outreach to employers. Board or Workforce Solutions Office staff may use feasibility studies to assess the needs of and options for at-risk companies, as well as offer employment and training activities to address risk factors. Following the initial contact with the employer and worker representatives, an employee information orientation may be conducted on-site and on company time. The orientation typically offers an overview of available services and additional activities that may be conducted onsite. Additional activities include workshops or seminars on the psychology of job loss/stress management, debt/financial management and, specifically, negotiations for debt-payment arrangements, job search skills, and labor market information. The orientation may also provide information on UI and, if appropriate, the Trade Adjustment Assistance (TAA) program.

Workforce Solutions Office staff may establish an on-site career transition center when a layoff involves large numbers of employees from a single employer, and the center is acceptable to company management and labor representatives. Staff will consider such factors as convenience, distance from the employer to the closest Workforce Solutions Office, work schedules of the employees, and time off permitted by the employer to attend the activities.

Workforce areas are also encouraged to engage rapid response staff in the BSUs. Rapid response staff attached to the BSU has access to team resources helpful in matching worker skill sets with company hiring requirements. TWC and the Boards set the stage to assist businesses with future staffing needs by maintaining a positive relationship throughout the layoff process. To this end, the outreach effort highlights both the services available to at-risk employers and those services available once business improves and staff needs rebound.

Trade Adjustment Assistance

Individuals who have lost their jobs due to increased foreign imports or shifts in productions to foreign markets may be eligible for federally funded TAA. Workforce Solutions Offices provide all workforce services, including TAA services, in an integrated environment using common data systems.

TAA is likewise integrated into early intervention services (i.e., rapid response) carried out under WIOA. When Workforce Solutions Office staff becomes aware of potential dislocations, consideration is always given to whether the dislocation has potential trade

implications; if so, assistance is provided to the company, workers, or affected unions to promote TAA petition submission. Additionally, when a petition is independently submitted by one of these groups, the TAA state coordinator conveys the petition to the responsible Board partner to ensure that a rapid response effort is mounted to assist the company and workforce with transition services.

In compliance with Title 20, CFR Part 618, the State of Texas houses merit staff in Workforce Solutions Offices across the state to offer TAA case management. Merit staff is positioned in locations where TAA certification and service provision activity indicates the greatest need. Where TAA merit staff is not present, WIOA or ES staff provides TAA case management to assist the customer in preparing for and obtaining suitable reemployment as quickly as possible.

Suitable employment is defined as work of an equal skill level or higher, and paying at least 80 percent of the worker's average weekly wage. Staff may initiate an assessment of the worker's transferable skills, knowledge, and abilities and assist in researching both the labor markets within the commuting area and, if the worker is willing to relocate, other labor markets where relocation might be acceptable. Additionally, Texas Workforce Solutions will provide employment and job search assistance services designed to properly equip the TAA customer to conduct and conclude a successful job search campaign.

In the absence of suitable and available employment, Texas Workforce Solutions and the TAA customer may undertake additional assessment activity to determine if TAA training is appropriate. Using vocational exploration resources such as mySkills myFuture, CareerOneStop.org, and TWC labor market information, the TAA customer can identify specific occupational goals. Assessment instruments such as Accuplacer, Compass, Test of Adult Basic Education (TABE), Test of English as a Foreign Language (TOEFL), and other training provider-specific assessment tools allow the customer and Texas Workforce Solutions to determine the viability of proposed training. All training activity supported under TAA must meet the approval criteria set forth in 20 CFR §617.22(a).

More than 3,800 qualifying individuals were provided with TAA benefits and other workforce services by TWC in FY 2014. In the absence of suitable employment, nearly 3,000 of those qualifying individuals participated in training programs to help them learn skills that would improve their ability to find new employment.

B. ADULT AND DISLOCATED WORKER PROGRAM REQUIREMENTS

1. WORK-BASED TRAINING MODELS

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

Allotments under WIOA enable the state to assist Boards in providing workforce investment activities for adults and dislocated workers.

Workforce development and adult education and training are key services available to prepare job seekers for success in jobs that employers need filled. By improving the skills,

education, and literacy levels of individual adults and dislocated workers, these services improve their subsequent employment, job retention, and earnings.

Alternative Training Models

Texas uses a number of alternative training programs as part of its workforce development strategy. These programs involve TWC collaborating with Boards, companies, and education training providers to improve training, as well as awarding a competitive grant program for training programs. These are discussed in other sections of the plan; however, a few deserve highlighting because of their success in advancing high-quality on-the-job training and incumbent worker training for both the participant and the employer.

The Skills Development Fund is Texas' premier job-training program providing training opportunities for Texas businesses and workers. Funding for the program is administered by TWC. Success is achieved through collaboration among businesses, public community and technical colleges, Boards, and economic development partners.

The Skills Development Fund program assists businesses and trade unions by financing the design and implementation of customized job-training projects. This fund merges business needs and local customized training opportunities into a winning formula to increase the skills levels and wages of the Texas workforce.

The Skills for Small Business program receives financing out of the Skills Development Fund. The Skills for Small Business program is dedicated to supporting the backbone of Texas' economy—small employers. Businesses with fewer than 100 employees can apply to TWC for training offered by their local community or technical college, or the Texas Engineering Extension Service (TEEX). The program trains newly hired employees, with the intent of helping to fill positions for work that employers currently cannot fill and that often pay better than most jobs. TWC works with the college to fund the specific courses selected by businesses for their employees.

The Skills for Veterans initiative also receives financing out the Skills Development Fund, in order to specifically address the training needs of post-9/11 veterans returning home and entering the Texas workforce. Skills for Veterans train veterans for jobs in high-demand by Texas employers. Employers that hire post-9/11 era veterans, including those who served in Operation Iraqi Freedom/Operation New Dawn or Operation Enduring Freedom, may be eligible to participate in this training opportunity, offered by their local community or technical college, or the Texas Engineering Extension Service (TEEX).

The Self-Sufficiency Fund program assists businesses and trade unions by financing the development and implementation of customized job-training projects for new and current workers. Self-Sufficiency Fund grants offer businesses customized training solutions that support workforce hiring efforts and skills upgrading for current workers. The purpose of the Self-Sufficiency Fund is to provide training for targeted employment opportunities, primarily for adult Temporary Assistance for Needy Families recipients as well as those individuals at risk of becoming dependent on public assistance.

2. REGISTERED APPRENTICESHIP

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

The apprenticeship program serves employers and job seekers by training workers for well-paying jobs with promising futures. Texas law and rule support only DOL-registered apprenticeship training programs, which pay part of the cost of job-related classroom instruction. TWC coordinates the state's apprentice training program, applying approximately $1 million in WIOA statewide-discretionary funds to supplement state general revenue. The Texas legislature budgets approximately $1.5 million in general revenue each year of the current biennium. In State Fiscal Year 2015, 4,648 apprentices participated in the apprenticeship training program, exceeding the Legislative Budget Board (LBB) performance measure of 3,600.

In June 2014, TWC adopted new program rules, including a provision authorizing development and adoption of annual performance measures and targets for apprenticeship training. The new rules also changed the funding mechanism for determining eligible programs from strictly an application process to considering past performance of apprenticeship training. Apprenticeship programs have demonstrated that employers who invest in training have lower employee turnover, increased employee productivity, better employee problem-solving skills, and improved employee relations. The employer and employee are equally committed to the program's success.

Beginning in FY 2016 TWC's new apprenticeship training performance measure will be increased from 4,400 to 6,111 individuals served/trained per year as established with the approval of the TWC's Legislative Appropriation Request of an additional $1.5 million in FY 2016 and FY 2017. With these additional funds, TWC can help address demand for apprenticeship jobs across Texas.

3. TRAINING PROVIDER ELIGIBILITY PROCEDURE

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

The application process for training providers largely remains the same as that of WIA; however, WIOA established additional requirements, specifically to provide more information and criteria for initial and subsequent eligibility to receive funds. These requirements ensure both the quality of the training programs and the opportunity for customer-informed choice regarding the available programs.

The Boards will continue to solicit training and education providers to submit applications for eligibility to receive WIOA funds for educational programs. Programs must support targeted occupations and lead to a postsecondary credential or industry-recognized credential/certificate.

Starting January 1, 2016, all training providers must submit information and criteria as established under WIOA §122(d) through (g). Training providers use TWC's Eligible Training Provider System (ETPS) to provide all required information for initial eligibility, which include Provider Assurances Statement, as well as applications for each program of

study. ETPS doubles as TWC's program certification system and the Statewide List of Eligible Training Providers, as required by WIOA §122 (a)(3). Boards then review and certify the provider and program if all minimum requirements are met, as established by the governor or higher standards as determined by Board policy. The ETPS automated system then informs TWC of the Board's review and approval of programs of study, and validates all WIOA training provider requirements. Subsequent eligibility determinations take place on a biennial basis, where performance data is again evaluated against the standards.

TWC, the Board, or training providers have the option to remove the training program from the ETPS anytime it is so warranted, due to performance monitoring findings, programs no longer leading to a targeted/demand occupation, or the training provider no longer offers or wishes to maintain training programs on the ETPS.

Apprenticeship programs that are registered with the State or the U.S. Department of Labor (DOL), Office of Apprenticeship are automatically eligible to be included on the State Eligible Training Provider List (ETPL). Registered apprenticeship programs are given an opportunity to consent to inclusion on the ETPL before being placed on the list, and will remain on the ETPL for as long as the program is registered with DOL or until they request to be removed.

Registered apprenticeship programs are not subject to the same application and performance information requirements or to the same initial or continued eligibility procedures as other eligible training providers.

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

Priority for individualized career services and training services are provided on a priority basis, regardless of funding levels, to:

- public assistance recipients;
- other low-income adults; and
- individuals who are basic skills deficient.

The individuals who receive these services are prioritized accordingly:

1. Eligible veterans and eligible spouses (as defined in WD Letter 25-15) who also are recipients of public assistance, low-income, and/or basic-skills deficient.

2. Foster youth and former foster youth, who also are recipients of public assistance, low-income, and/or basic-skills deficient.

3. All other individuals who are recipients of public assistance, low-income, and/or basic-skills deficient.

4. All other eligible veterans and eligible spouses.

5. All other foster youth and former foster youth.

6. All other individuals, including Boards' local priority groups.

TWC ensures that local board policies are in place to ensure priority for the populations described above. In addition, TWC allows the boards the flexibility to create a policy that includes a process that also gives priority to other individuals, as long as priority for those individuals comes after the first five groups described above.

For example, Boards may establish local priority groups for older workers (age 40 or older) or employed individuals whose income is below the Board's self-sufficiency level, but these local priority groups do not replace the statutory priority given to individuals who are recipients of public assistance, low-income, or basic skills deficient. The Board's local priority groups must fall within Group 6, "All other individuals, including local Boards' local priority groups" as listed above.

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

TWC established a policy that allows Boards the flexibility to transfer up to 100 percent of funds between WIOA adult and dislocated worker allocations consistent with WIOA provisions. The policy states that Boards who are under a Technical Assistance Plan or Corrective Action Plan for an adult or dislocated worker program may be subject to limitations on the amounts they are allowed to transfer.

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

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

WIOA sets out a number of changes for the youth formula-funded program. The most significant change is the shift to focus resources primarily on out-of-school youth. WIOA raises the minimum percentage of funds required to be spent on out-of-school youth from 30 percent to 75 percent. This intentional shift refocuses the program to serve out-of-school youth during a time when large numbers of youth and young adults are out of school and not connected to the labor force. Additionally, under WIOA, opportunities for work experience become an important element of the program. WIOA prioritizes work experience with the requirement that Boards must spend a minimum of 20 percent of youth funds on work experience.

WIOA enhances the youth program design through an increased emphasis on individual participant needs by adding new components to the objective assessment and individual

service strategy. Career pathways are incorporated as part of both the objective assessment and development of the individual service strategy. In addition, the individual service strategy must directly link to one or more of the performance indicators. The program design under WIOA also includes effective connections to employers, including small employers, in in-demand industry sectors and occupations.

TWC allocates youth formula funds to Boards, that in turn contract with service providers to deliver services to youth in their respective workforce areas. Boards are required to meet all federal and state programmatic requirements. TWC maintains a rigorous performance and accountability system, holding Boards accountable for their performance as it pertains to the youth program as it does with other workforce programs, and Boards have rigorous standards in place for their contracted service providers. Boards must ensure that all 14 program elements—including new WIOA program elements such as financial literacy and services that provide labor market and employment information about in-demand industry sectors or occupations available in workforce areas—are available to youth participants.

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

A segment of out-of-school youth are unemployed and may also be enrolled in public assistance programs or detained by the juvenile or criminal justice systems. In addition, many out-of-school youth are dropouts, which may present a significant employment barrier.

Youth who are no longer in the public school system and are seeking to enter the labor market for the first time are inexperienced. As such, Boards must design services that:

- acknowledge the problems and characteristics of inexperienced job seekers;
- outreach and engage with the growing out-of-school youth population;
- obtain and use information concerning the conditions of employment affecting youth and labor laws restricting their employment;
- develop and maintain effective relationships with schools, colleges, and other training providers; and
- develop employment opportunities with career potential for youth.

Texas operates an integrated workforce system that relies on collaboration and coordination amongst partners. This collaboration and coordination is necessary when developing strategies to achieve improved outcomes for out-of-school youth, as this population will often seek assistive services from public or private community-based organizations. As such, partner programs must continue to build on existing partnerships—and develop new partnerships as needed—with community-based providers such as child welfare agencies, social service organizations, group homes, probation or parole officers, and local schools to find and engage at-risk youth before they become disconnected.

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

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

Texas shares the purposes of WIOA, including fostering integrated systems, coordinated services, career pathways, and multiple forms of engagement with businesses to benefit all customers, particularly youth. These ends recognize that career and personal success is a result of lifelong learning and continued growth in skill and abilities.

Boards develop a strategic and operational plan for implementing WIOA youth programs consistent with the governor's vision of strengthening the academic and future workplace outcomes for youth facing challenges and barriers to success. Boards design activities consistent with the specific eligibility criteria for two groups described in the WIOA Title I youth formula-funded program: in-school youth (ISY) and out-of-school youth (OSY).

Boards are encouraged to conduct thorough analysis of local gaps in youth-serving programs, and then identify the most appropriate education or training, or employment activities, to undertake. Certain services of WIOA youth programs are required, as proposed by regulation §681.460 of WIOA §129(c)(2), including the following:

- Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to a high school diploma or its recognized equivalent or postsecondary credential;
- Alternative secondary school services or dropout recovery services;
- Paid and unpaid work experiences that have academic and occupational education as a component, such as summer and nonseasonal employment, pre-apprenticeship programs, internships and job shadowing, and on-the-job-training, in the private for-profit or nonprofit sectors;
- Occupational skills training, which includes priority consideration for training programs that lead to recognized postsecondary credentials in in-demand industries or occupations in the local area;
- Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation;
- Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors;
- Support services, such as linkages to community services, assistance with transportation, child and dependent care, assistance with housing, needs-related payments, assistance with educational testing, reasonable accommodations for youth with disabilities, referrals to health care, and assistance with uniforms or other appropriate work attire and tools;
- Adult mentoring for at least 12 months;
- Follow-up services for not less than 12 months after completing participation;
- Comprehensive guidance and counseling, such as drug and alcohol abuse, as well as referrals to counseling, as appropriate;
- Financial literacy education;

- Entrepreneurial skills training;
- Services providing 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
- Activities that help youth prepare for and transition to postsecondary education and training.

Boards must ensure that all 14 program elements—including new WIOA program elements such as financial literacy and services that provide labor market and employment information about in-demand industry sectors or occupations available in workforce areas—are available to youth participants.

Every individual meeting criteria for ISY or OSY eligibility may participate in the above services, if formally enrolled in the program and appropriate for the participant's assessment and individual service strategy. Continuous performance assessment, technical assistance, and monitoring are fundamental to the Boards' compliance with the design framework service of local youth programs, as proposed in regulation §681.420.

Outreach specialists dedicated to the Migrant and Seasonal Farmworker (MSFW) community collaborate with Boards to inform youth in this targeted population of educational, training, and employment services. Concurrently, local youth-serving agencies facilitate counseling of MSFW youth on programs to complete their secondary education and prepare for economically sustaining employment.

Boards recognize that successful implementation of WIOA's purposes rests on youth programs that reconnect OSY to education and jobs. The OSY population consists in large part of high school dropouts who are likely to face significant barriers to employment. As required by WIOA, Boards expend a minimum of 75 percent of the youth formula funds on serving OSY (in contrast to the 30 percent required under WIA).

Youths who are no longer in the public school system and are seeking to enter the labor market may face extraordinary barriers. Boards work to design services that:

- acknowledge the challenges and characteristics of inexperienced job seekers;
- obtain and use information concerning the conditions of employment affecting youth and labor laws restricting their employment;
- develop and maintain effective relationships with schools, colleges, and other training providers; and
- develop employment opportunities for youth with career potential.

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

TWC provides Boards with the flexibility to define the "requires additional assistance to complete an educational program, or to obtain or retain employment" criterion, as set forth in WIOA. The state policy is as follows:

"The Board may establish definitions and eligibility documentation requirements for the 'requires additional assistance to complete an educational program, or to obtain or retain employment' criterion of ISY and OSY eligibility."

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

Texas law does not explicitly define the terms "attending school" and "not attending school."

As such, for the purpose of determining in-school youth and out-of-school youth eligibility under WIOA, TWC has established that a child is "attending school" if the child is:

- enrolled in a school that leads to the attainment of a state-recognized high school diploma, including a public school, charter school, or private school; or
- homeschooled.

The following programs are not considered "school" under WIOA:

- Adult education provided under Title II of WIOA
- YouthBuild programs
- Job Corps programs

Alternative Education—A disciplinary alternative education program is established in conformance with Texas Education Code §37.008. Alternative education is an educational and self-discipline alternative instructional program, adopted by local policy, for students in elementary through high school grades who are removed from their regular classes for mandatory or discretionary disciplinary reasons. Juvenile justice alternative education programs were created to serve the educational needs of juvenile offenders and at-risk youth who are expelled from the regular classroom or the school district disciplinary alternative education program. (Texas Education Code, Chapter 37)

6. IF USING THE BASIC SKILLS DEFICIENT DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INCLUDE THE STATE DEFINITION WHICH MUST FURTHER DEFINE HOW TO DETERMINE IF AN INDIVIDUAL IS UNABLE TO COMPUTE OR SOLVE PROBLEMS, OR READ, WRITE, OR SPEAK ENGLISH, AT A LEVEL NECESSARY TO FUNCTION ON THE JOB, IN THE INDIVIDUAL'S FAMILY, OR IN SOCIETY. IF NOT USING THE PORTION OF THE DEFINITION CONTAINED IN WIOA SECTION 3(5)(B), INDICATE THAT IS THE CASE.

Texas is using the basic skills deficient definition contained in WIOA Section 3(5)(B), as follows:

An individual who meets either of the following criteria satisfies the basic skills deficient requirement for WIOA youth services is a youth who:

- has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or
- 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.

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 include—

1. ANY COMMENTS FROM THE PUBLIC COMMENT PERIOD THAT REPRESENT DISAGREEMENT WITH THE PLAN. (WIOA SECTION 108(D)(3).)

2. THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS, AS DETERMINED BY THE GOVERNOR, IF DIFFERENT FROM THAT FOR THE STATE. (WIOA SECTION 108(B)(15).)

3. A DESCRIPTION OF THE TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES AND SUCCESSFUL MODELS, INCLUDING FOR YOUTH WITH DISABILITIES. (WIOA SECTION 108(B)(9).)

N/A

4. A DESCRIPTION OF THE ROLES AND RESOURCE CONTRIBUTIONS OF THE ONE-STOP PARTNERS.

5. THE COMPETITIVE PROCESS USED TO AWARD THE SUBGRANTS AND CONTRACTS FOR TITLE I ACTIVITIES.

6. HOW TRAINING SERVICES OUTLINED IN SECTION 134 WILL BE PROVIDED THROUGH INDIVIDUAL TRAINING ACCOUNTS AND/OR THROUGH CONTRACTS, AND HOW SUCH TRAINING APPROACHES WILL BE COORDINATED. DESCRIBE HOW THE STATE WILL MEET INFORMED CUSTOMER CHOICE REQUIREMENTS REGARDLESS OF TRAINING APPROACH.

7. HOW THE STATE BOARD, IN FULFILLING LOCAL BOARD FUNCTIONS, WILL COORDINATE TITLE I ACTIVITIES WITH THOSE ACTIVITIES UNDER TITLE II. DESCRIBE HOW THE STATE BOARD WILL CARRY OUT THE REVIEW OF LOCAL APPLICATIONS SUBMITTED UNDER TITLE II CONSISTENT WITH WIOA SECS. 107(D)(11)(A) AND (B)(I) AND WIOA SEC. 232.

8. COPIES OF EXECUTED COOPERATIVE AGREEMENTS WHICH DEFINE HOW ALL LOCAL SERVICE PROVIDERS WILL CARRY OUT THE REQUIREMENTS FOR INTEGRATION OF AND ACCESS TO THE ENTIRE SET OF SERVICES AVAILABLE IN THE ONE-STOP DELIVERY SYSTEM, INCLUDING COOPERATIVE AGREEMENTS WITH ENTITIES ADMINISTERING REHABILITATION ACT PROGRAMS AND SERVICES.

E. WAIVER REQUESTS (OPTIONAL)

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:

PPPPPPPPPPPPPPPPPPP. SUPPORTING EMPLOYER ENGAGEMENT;
QQQQQQQQQQQQQQQQQQQ. CONNECTING EDUCATION AND TRAINING STRATEGIES;
RRRRRRRRRRRRRRRRRRR. SUPPORTING WORK-BASED LEARNING;
SSSSSSSSSSSSSSSSSSS. IMPROVING JOB AND CAREER RESULTS, AND
TTTTTTTTTTTTTTTTTTT. OTHER GUIDANCE ISSUED BY THE DEPARTMENT.

5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER, INCLUDING HOW THE WAIVER WILL IMPACT SERVICES FOR DISADVANTAGED POPULATIONS OR INDIVIDUALS WITH MULTIPLE BARRIERS TO EMPLOYMENT; AND

6. DESCRIBES THE PROCESSES USED TO:

UUUUUUUUUUUUUUUUUUU. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
VVVVVVVVVVVVVVVVVVV. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;

WWWWWWWWWWWWWWWWWWWW. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;

XXXXXXXXXXXXXXXXXXX. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.

YYYYYYYYYYYYYYYYYYY. 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;

WAIVER REQUEST 1

Out-of-School Youth Expenditure Requirement

Statutory and regulatory provisions to be waived

The Texas Workforce Commission (TWC) is seeking a waiver of the requirement under Workforce Innovation and Opportunity Act (WIOA) §129(a)(4) and 20 CFR 681.410 that the state and local workforce development areas (workforce areas) spend not less than 75 percent of youth funds to provide services to out-of-school youth (OSY).

On October 11, 2017, the US Department of Labor Employment and Training Administration (DOLETA) granted TWC a waiver reducing the OSY expenditure requirement from 75 percent to 50 percent of youth funds for workforce areas directly impacted by Hurricane Harvey, thus allowing those workforce areas flexibility to meet the increased needs of in-school youth (ISY) affected by the disaster. That waiver is effective through September 30, 2018, corresponding with the approval period of the state's Hurricane Harvey National Dislocated Worker Grant.

This request is for a waiver to allow the state and all workforce areas in Texas the flexibility to direct up to 50 percent of youth funds to deliver workforce and educational services to ISY, while continuing to serve OSY as a priority population. Additionally, TWC is seeking flexibility to calculate OSY expenditures on a collective statewide basis, for all WIOA funds directed toward youth service delivery, instead of siloed calculations associated with formula funding allocated to Local Workforce Development Boards (Boards) and the Governor's reserve funding. This strategy will allow Boards, and the state as a whole, to more effectively serve youth in need of workforce and educational services.

Actions taken to remove state or local statutory or regulatory barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. TWC regulations and policy statements are in compliance with current federal law.

Waiver goals and expected outcomes

While provision of services to OSY is vital, the requirement to expend 75 percent of youth statewide and formula funds on OSY prohibits states and workforce areas from using discretion when serving youth based on state and local demographics, resources, economies, employment outlooks, and other labor market factors. The requirement also

weakens Title I's ability to design and deliver meaningful career pathway programs to all youth, regardless of school status. The 75 percent OSY expenditure requirement limits state and local ability to carry out such initiatives that provide necessary educational and training experiences for students and that meet employer's workforce education and skills needs.

Employer engagement is an essential component of successful youth outcomes. One way that Texas is working to increase employer engagement is by actively encouraging employers to offer students paid internships through the Texas Internship Challenge—a partnership between TWC, Texas Education Agency, and The Higher Education Coordinating Board. This initiative challenges employers to offer paid internships and make it easy for students to search and apply for them. Several employers in high-demand industries have already committed to and are actively involved in this initiative. TWC will continue to encourage more employers to make internships available to students.

Consistent with WIOA's increased emphasis on credential attainment, this flexibility would allow the state and Local Workforce Development Boards (Boards) to provide work-based learning opportunities, such as work experience, for ISY as specified at WIOA §129(c)(2)(C) and 20 CFR §681.600. Providing more work-based learning opportunities to ISY would allow Texas to continue strengthening its commitment to developing activities that enhance the choices available to eligible youth and encourage them to complete secondary education, enroll in postsecondary education and advanced training, progress through a career pathway, and enter into unsubsidized employment that leads to economic self-sufficiency in accordance with WIOA §129(b)(2).

Boards throughout the state host youth career exploration and job fairs to help students identify local resources and connect them to employment opportunities in their area. The 75 percent OSY expenditure requirement restricts Boards' ability to direct adequate resources to these and similar crucial youth outreach activities, which ultimately limits local opportunities to reach ISY.

Additionally, Texas is the nation's second most populous state. It is also the second largest geographically. As such, much of the state is rural. According to the US Census Bureau report, "Life Off the Highway: A Snapshot of Rural America," 15 percent of Texans live in rural areas compared to 4.9 percent of Californians. California's population exceeds Texas' by more than 10 million people, yet more than twice as many Texans (4.2 million) than Californians (1.9 million) live in rural areas. Boards in rural communities have expressed the challenges they face in identifying and serving OSY in those areas. Further, given the economic and employment challenges experienced by many rural communities, ISY residing in rural communities are in need of the assistance offered by the Texas workforce system and would benefit from job fairs, hiring events, paid and unpaid work experiences, and other services and activities in their workforce areas.

Reducing the OSY expenditure requirement to 50 percent and permitting flexibility to calculate OSY expenditures on a collective statewide basis, instead of per workforce area, would allow TWC and Boards to continue serving the OSY population while also increasing their ability to meet the needs of ISY throughout the state in alignment with WIOA's intent by supporting career pathways and the preparation of young people for in-demand careers in the workforce, regardless of a youth's school status. Under this waiver, Boards would continue to serve OSY as a priority population and track OSY services, expenditures, and performance metrics.

Goals:

- **Serve youth regardless of school status**

  Allowing Boards flexibility to increase spending on providing education and training to ISY would not only increase the workforce opportunities available to all youth, but also help prevent at-risk ISY from dropping out of school or not pursuing additional education and training that would lead to meaningful work and economic self-sufficiency.

- **Serve ISY in rural communities**

  Help ISY living in rural workforce areas overcome the unique economic and employment challenges facing rural—and often remote—Texas communities.

- **Serve youth according to local and statewide need**

  Provide local and state-level flexibility to serve OSY and ISY in a way that best meets each workforce area's needs according to population, resources, economy, employment outlook, and other labor market factors.

- **Continue serving out-of-school youth as a priority population**

  TWC and Boards will continue to give priority of service to OSY and achieve any OSY expenditure target authorized by DOLETA through this waiver request.

Programmatic Outcomes:

The approval of this waiver would permit Boards the opportunity to determine how best to meet the educational and training needs of youth, regardless of school status, and specific to the population, geographical location, and economic and employment conditions of each workforce area. Increasing outreach to ISY while maintaining a focus on serving OSY will help develop a larger pool of young people qualified and prepared to meet the current and future needs of employers in their workforce areas and throughout the state.

Department of Labor's policy priorities

This waiver aligns with DOL's policy priorities in that it:

- focuses on ensuring that eligible youth achieve secondary and postsecondary educational success;
- increases youths' access to and opportunities for the education, training, employment, and support services that they need;
- aligns with WIOA's intent by supporting career pathways and the preparation of young people for in-demand careers; and
- ensures that ISY do not fall into an at-risk category because of expenditure restrictions.

Individuals impacted by the waiver

This waiver is intended to benefit at-risk ISY statewide who face barriers to education, training, and employment. OSY will also benefit, because they will continue to be served as a priority population in accordance with WIOA. Boards will benefit from increased flexibility to develop unique solutions to better serve youth according to local conditions and needs.

Process for monitoring waiver implementation progress

TWC has a monitoring and performance accountability system that measures results for employers and other customers who use the Texas workforce system. TWC continuously analyzes performance reports and compares actual performance with contracted targets. TWC will continue to adjust monitoring of performance requirements to ensure that the state meets its performance goals and objectives. TWC will monitor progress under this waiver by reviewing monthly expenditure and performance reports submitted by the Boards, through regularly scheduled conference calls with Board executive directors, and through its monitoring and performance accountability system.

Notice to affected Boards

TWC notified all Boards that the agency is seeking this waiver request and sought their input before submitting this request to DOLETA.

Public comment

To ensure meaningful public comment, including comments from business and organized labor, TWC will include this waiver request as part of the agency's WIOA plan modification when the plan modification is presented for public comment.

Waiver impact

TWC will collect information about this waiver through its monitoring and performance accountability system and report waiver outcomes in the state's WIOA Annual Report. If the state requests renewal of this waiver, then TWC will provide the most recent outcomes data available.

WAIVER REQUEST 2

Youth Individual Training Accounts

Statutory and regulatory requirements to be waived

The Workforce Innovation and Opportunity Act (WIOA) rule at 20 CFR §681.550 limits the use of individual training accounts (ITAs) for youth participants to out-of-school youth (OSY) ages 16 to 24. The Texas Workforce Commission (TWC) is seeking a waiver of this rule to extend the use of ITAs to in-school youth (ISY).

On October 11, 2017, the US Department of Labor Employment and Training Administration (DOLETA) granted TWC a waiver allowing local workforce development areas (workforce areas) impacted by Hurricane Harvey and those serving youth from disaster areas to provide affected ISY with ITAs to meet the individual training and employment needs of all youth participants affected by or dislocated by Hurricane Harvey. That waiver is effective through September 30, 2018, corresponding with the approval period of the state's Hurricane Harvey National Dislocated Worker Grant.

This request is for a statewide waiver to grant ISY the same participant choice options that OSY have by allowing workforce area staff to use ITAs when appropriate to provide education and training to ISY.

Actions taken to remove state or local statutory or regulatory barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. TWC regulations and policy statements are in compliance with current federal law.

Goals and expected outcomes of waiver

Once a youth enrolls in a WIOA program as an ISY, that youth maintains ISY status until exiting the program. Excluding ISY from receiving ITAs undermines WIOA's goals to expand program options, increase program flexibility, and enhance customer choice. DOL states in the preamble to the WIOA Final Rule that ISY age 18 or older may access ITAs through the adult program. This is problematic in that it excludes ISY from entering ITA-funded educational and training programs that may be critical to ISY who drop out or are at risk of dropping out of school. Youth caught in this gap are susceptible to leaving the workforce program and not achieving the education, training, and certifications that develop the skills employers require and that lead to economic self-sufficiency.

This waiver would permit Local Workforce Development Boards (Boards) to provide certain ISY with ITAs. Such flexibility would allow workforce area staff the necessary flexibility to use Youth formula funds when appropriate to meet the individual training and employment needs of certain at-risk ISY participants. Boards would be required to track performance for ISYs using ITAs.

Goals:

- **Increase in-school youths' access to educational and training programs**

  Allowing Boards flexibility to use ITAs to provide education and training for ISY would increase the workforce opportunities available to youth and help at-risk ISY to pursue education and training that would lead to meaningful work and economic self-sufficiency.

Programmatic Outcomes:

Disrupting a youth participant's access to education and training services increases the probability that the youth will not complete the program. The approval of this waiver would allow Boards to provide seamless service continuity to ISY who drop out of school or are at risk of dropping out of school. Through this waiver, ISY who drop out of school would not need to exit the youth program and then wait 90 days to re-enroll as an OSY.

Department of Labor's policy priorities

This waiver aligns with DOL's policy priorities in that it:

- increases youths' access to and opportunities for the education, training, employment, and support services that they need;

- ensures that at-risk ISY do not fall into a regulatory gap that could prevent them from receiving the education and training necessary to securing meaningful work and economic self-sufficiency; and
- supports WIOA's goals to expand program options, increase program flexibility, and enhance customer choice.

Individuals impacted by the waiver

This waiver would benefit ISY who drop out of school or are at risk of dropping out of school.

Process for monitoring waiver implementation progress

TWC has a monitoring and performance accountability system that measures results for employers and other customers who use the Texas workforce system. TWC continuously analyzes performance reports and compares actual performance with contracted targets. TWC will continue to adjust monitoring of performance requirements to ensure that the state meets its performance goals and objectives. TWC will monitor progress under this waiver by reviewing monthly expenditure and performance reports submitted by the Boards, through regularly scheduled conference calls with Board executive directors, and through its monitoring and performance accountability system.

Notice to affected Boards

TWC notified all Boards that the agency is seeking this waiver request and sought their input prior to submitting this request to DOLETA.

Public comment

To ensure meaningful public comment, including comments from business and organized labor, TWC will include this waiver request as part of the agency's WIOA plan modification when the plan modification is presented for public comment.

Waiver impact

TWC will collect information about this waiver through its monitoring and performance accountability system and report waiver outcomes in the state's WIOA Annual Report. If the state requests renewal of this waiver, then TWC will provide the most recent outcomes data available.

WAIVER REQUEST 3

Adult Education and Literacy Provider Procurement

Statutory and regulatory requirements to be waived

Workforce Innovation and Opportunity Act (WIOA) §231(a), pursuant to §222(a)(1), requires each eligible agency to award multiyear grants or contracts, on a competitive basis, to eligible training providers within the state for adult education and literacy (AEL) services. The Texas Workforce Commission (TWC) is seeking a waiver to grant the state flexibility to either award AEL grants directly to AEL providers or to allocate funds to Local Workforce Development Boards (Boards) to conduct a local competitive procurement for the delivery of AEL services.

Actions taken to remove state or local statutory or regulatory barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. TWC regulations and policy statements are in compliance with current federal law.

Full integration of AEL activities within each local workforce development area (workforce area) would be more effectively advanced by allowing the eligible agency (TWC) to distribute AEL formula funding to Boards and enable the Boards to competitively procure AEL services and activities appropriate for their workforce areas.

Goals:

- **Full integration of AEL activities within each workforce area**

  Boards procure providers for employment and training services and activities. Local procurement of AEL providers would further integrate AEL activities into the workforce system.

- **Promote local flexibility**

  Boards are the experts on their local labor markets. Allowing them the option to competitively procure AEL services and activities would increase their ability to make decisions that are best for their workforce areas.

Programmatic Outcomes:

The approval of this waiver would offer Boards options to procure AEL providers in a way that best meets each workforce area's needs according to population, resources, economy, employment outlook, and other labor market factors.

Department of Labor's policy priorities

This waiver aligns with DOL's policy priorities in that it:

- connects education and training strategies by allowing local control of the AEL provider procurement process;
- improves job and career results by allowing Boards to engage in the provider approval process; and
- promotes full integration of AEL activities within workforce areas.

Individuals impacted by the waiver

This waiver is intended to allow each Board the choice to conduct local competitive procurement for the delivery of AEL services or to let TWC continue to manage that process.

Process for monitoring waiver implementation progress

TWC has a monitoring and performance accountability system that measures results for employers and other customers who use the Texas workforce system. TWC continuously analyzes performance reports and compares actual performance with contracted targets. TWC will continue to adjust monitoring of performance requirements to ensure that the state meets its performance goals and objectives. TWC will monitor progress under this

waiver by reviewing monthly expenditure and performance reports submitted by the Boards, through regularly scheduled conference calls with Board executive directors, and through its monitoring and performance accountability system.

Notice to affected Boards

TWC notified all Boards that the agency is seeking this waiver request and sought their input prior to submitting this request to the US Department of Labor Employment and Training Administration.

Public comment

To ensure meaningful public comment, including comments from business and organized labor, TWC will include this waiver request as part of the agency's WIOA plan modification when the plan modification is presented for public comment.

Waiver impact

TWC will collect information about this waiver through its monitoring and performance accountability system and report waiver outcomes in the state's WIOA Annual Report. If the state requests renewal of this waiver, then TWC will provide the most recent outcomes data available.

WAIVER REQUEST 4

Local Performance Accountability Flexibility

Statutory and regulatory requirements to be waived

The Texas Workforce Commission (TWC) is seeking a limited waiver from Workforce Innovation and Opportunity Act (WIOA) §116(c) pertaining to local performance accountability measures for Subtitle B.

Actions taken to remove state or local statutory or regulatory barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. TWC regulations and policy statements are in compliance with current federal law.

Goals and expected outcomes of waiver

TWC requests a waiver from WIOA §116(c) to allow greater flexibility when contracting performance measures with the Local Workforce Development Boards (Boards) to allow TWC to promote further integration of services within Workforce Solutions Offices.

Specifically, TWC is requesting the flexibility to modify Board performance measures. Under this proposed waiver, TWC will continue to track and report the core indicators of performance at both state and Board levels as required by WIOA §116; however, the waiver will give TWC the flexibility to select among the statutory Title I measures and develop other measures to use in its Board contracts. TWC is interested in developing Board-contracted measures that support integration and that may be leading indicators for the statutorily prescribed measures to make them more useful to the Boards.

Prior to WIOA, under the Workforce Investment Act (WIA), TWC had a similar waiver that provided this flexibility in selecting and developing local performance accountability measures. This waiver was in place for more than 10 years and allowed TWC to use a set of

more integrated outcome measures that were aligned with the old WIA common measures but that were applicable to all participants, regardless of program. Through the Local Accountability Flexibility Waiver, TWC improved program integration and streamlined the agency's performance accountability model.

However, WIOA implementation resulted in the loss of that historic waiver and reintroduced a focus on "siloed" program outcomes rather than purely customer-focused considerations into the Texas workforce system. WIOA's requirement to contract separate indicators of performance by program to the Boards unnecessarily siloes service delivery and may rebuild a barrier to integration that TWC was able to mostly remove under the prior waiver.

While this proposed waiver would provide TWC flexibility in selecting Board performance measures, WIOA §116(g) will continue to provide sanctions for a Board's failure to meet any of the WIOA performance measures. Although the approval of this waiver would provide TWC with additional flexibility in determining which measures to formally contract to the Boards, accountability will not be impacted, as TWC would still apply the sanction provisions of WIOA §116(g) to those measures that are formally contracted.

Goals:

- **Increase integration of services to customers**

  Boards are responsible for implementing many federal and state workforce development programs, allowing them the opportunity to integrate service delivery; however, programs are partially driven by how performance is measured. Programs with different measures of success require different means of management. Rather than focusing on employers' needs and finding job seekers to fill those needs, staff must focus on the specific outcome expectations of the program that funds the services that the customer receives.

- **Better alignment in performance accountability at the state, local, and service provider levels**

  Because Boards are responsible for numerous workforce development programs, coenrollment of customers in multiple programs is becoming increasingly commonplace. Therefore, TWC believes that the most effective way to evaluate Boards and to promote accountability is to use integrated performance measures.

- **Greater flexibility to Boards in designing and implementing one-stop services**

  By eliminating program-specific measures and applying integrated performance measures across all programs, TWC will promote service-delivery designs that are based on the needs of its customers, including employers, rather than siloed program requirements.

Programmatic Outcomes:

The approval of this waiver would result in the continued administrative relief that would remove barriers to coenrollment and promote more integrated case management across multiple programs, as WIOA envisions. TWC strongly supports the concept that programs with similar outcome objectives should be measured in a similar fashion.

TWC has developed a set of systemwide performance measures for the Texas legislature and the governor to evaluate the Texas workforce system. Texas' new measures will be system measures applied across all programs. For example, there will be a systemwide measure based on an unduplicated list of exiters from all workforce programs (using the federal "soft exit" methodology). These measures will make no distinction between customers served by Employment Service; WIOA Adult, Dislocated Worker, and Youth; Temporary Assistance for Needy Families; Supplemental Nutrition Assistance Program; other various state-level programs; or a combination of programs.

Approval of this waiver would continue to allow the streamlining of administrative processes, resulting in maximized resources focused on employment outcomes.

Department of Labor's policy priorities

This waiver aligns with DOL's policy priorities in that it:

- supports employer engagement by promoting service-delivery designs that are based on employer needs;
- improves job and career results by identifying employers' needs and connecting employers with job seekers to meet those needs;
- promotes more integrated case management across multiple programs, as WIOA envisions; and
- maintains and enhances state and local performance accountability.

Individuals impacted by the waiver

Employers, job seekers, incumbent workers, and workforce area staff may benefit from the waiver. The removal of siloed performance measures and the implementation of more integrated measures will allow staff to focus on the needs of employers, find job seekers to match those needs, and maximize integrated services to achieve the best outcomes.

Process for monitoring waiver implementation progress

TWC has a monitoring and performance accountability system that measures results for employers and other customers who use the Texas workforce system. TWC continuously analyzes performance reports and compares actual performance with contracted targets. TWC will continue to adjust monitoring of performance requirements to ensure that the state meets its performance goals and objectives. TWC will monitor progress under this waiver by reviewing monthly expenditure and performance reports submitted by the Boards, through regularly scheduled conference calls with Board executive directors, and through its monitoring and performance accountability system.

Notice to affected Boards

TWC notified all Boards that the agency is seeking this waiver request and sought their input prior to submitting this request to the US Department of Labor Employment and Training Administration.

Public comment

To ensure meaningful public comment, including comments from business and organized labor, TWC will include this waiver request as part of the agency's WIOA plan modification when the plan modification is presented for public comment.

Waiver impact

TWC will collect information about this waiver and report waiver outcomes in the state's WIOA Annual Report. If the state requests renewal of this waiver, then TWC will provide the most recent outcomes information available.

WAIVER REQUEST 5

Infrastructure Funding Contributions

Statutory and regulatory requirements to be waived

The Texas Workforce Commission (TWC) is seeking a waiver of Workforce Innovation and Opportunity Act (WIOA) §121(b)(1)(A)(ii) and 20 CFR §678.700 to limit mandatory infrastructure payments to only those required partners that are colocated at a one-stop center.

Actions taken to remove state or local statutory or regulatory barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. TWC regulations and policy statements are in compliance with current federal law.

Goals and expected outcomes of waiver

Under WIOA, all required one-stop partners must pay infrastructure costs based on a proportionate share of their use of the workforce system and the relative benefit received, regardless of whether they are physically colocated at a one-stop center or not. That requirement imposes a disincentive for one-stop partners to fully integrate, as integration requires going through the cumbersome, burdensome, and costly process of determining, and periodically reassessing, their proportionate contributions to infrastructure funding. These requirements could also create a disincentive for partner programs to make referrals to other partner programs, thereby inhibiting integration and continuous workforce system improvement.

Limiting the infrastructure funding requirement to only those partners that are colocated would help states and Local Workforce Development Boards (Boards) and their workforce partners to move toward a fully integrated workforce system.

Goals:

- **Fully integrated workforce system**

  Allowing local flexibility in how infrastructure costs are funded would help maintain an environment that promotes integration among partners.

- **Improved service delivery to workforce system customers**

  Excluding non-colocated required partners from paying infrastructure costs would lift financial and administrative burdens from those partners, further incentivizing those partners to remain committed to creating a fully integrated workforce system.

Programmatic Outcomes:

The approval of this waiver would allow for continued local flexibility in how infrastructure costs are funded and maintain an environment that promotes integration among partners.

Department of Labor's policy priorities

This waiver aligns with DOL's policy priorities in that it:

- encourages cooperation among partners that leads to improved services to job seekers and employers;
- promotes integration of services; and
- maintains unity among all partners within the workforce system.

Individuals impacted by the waiver

This waiver is intended to benefit job seekers and employers by encouraging workforce partners to fully engage in an integrated workforce system.

Process for monitoring waiver implementation progress

TWC has a monitoring system that measures results for employers and other customers who use the Texas workforce system. TWC will monitor infrastructure funding requirements to ensure that the state and Local Workforce Development Boards (Boards) meet their compliance objectives. TWC will monitor progress under this waiver by reviewing subrecipient monitoring reports and through the provision of technical assistance to Boards as needed.

Notice to affected Boards

TWC notified all Boards that the agency is seeking this waiver request and sought their input prior to submitting this request to the US Department of Labor Employment and Training Administration.

Public comment

To ensure meaningful public comment, including comments from business and organized labor, TWC will include this waiver request as part of the agency's WIOA plan modification when the plan modification is presented for public comment.

Waiver impact

TWC will collect information about this waiver through its monitoring system. If the state requests renewal of this waiver, then TWC will provide the most recent outcomes data available.

WAIVER REQUEST 6

Eligible Training Providers Performance Reports

Statutory and regulatory requirements to be waived

The Texas Workforce Commission (TWC) is seeking a waiver of Workforce Innovation and Opportunity Act (WIOA) §116(d)(4) and 20 CFR §677.230(a)(5) to allow eligible training providers (ETPs) to collect and report performance data for WIOA-funded participants only.

Actions taken to remove state or local statutory or regulatory barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. TWC regulations and policy statements are in compliance with current federal law.

Goals and expected outcomes of waiver

Under WIOA §116(d)(4)(A) and 20 CFR §677.230(a)(5), ETPs must report performance data with respect to all individuals engaging in a program of study (or the equivalent). While TWC recognizes the value and importance of monitoring provider performance, requiring ETPs to produce data on all individuals instead of just WIOA-funded participants places an undue burden on ETPs to collect, enter, and report excessive data. This is especially burdensome when ETPs have many students of whom only a small percentage are WIOA participants. The US Departments of Labor (DOL) and Education acknowledge this burden in their response to comments regarding §677.230 in the preamble of the WIOA Final Rule by stating, "The Departments are cognizant of the reporting burden the ETP performance report places on ETPs and do not want to place additional burden on these entities," yet did not change the regulatory text.

Further, ETPs and TWC are concerned that providing data—including Social Security numbers—on all individuals engaging in a program of study (or the equivalent) instead of WIOA-funded participants only may conflict with the Family Educational Rights and Privacy Act (FERPA), which protects the privacy of student education records. Generally, schools must have written permission from the parent or eligible student to release any information from a student's education record (34 CFR §99.30). Releasing student information on individuals who are not workforce system participants without their explicit consent may be in violation of federal law and compromise their personally identifiable information (PII) and potentially make those students vulnerable to identity theft and privacy risks.

Burdensome reporting requirements combined with mandatory submission of PII for non-WIOA-funded participants disincentivizes training providers from participating or remaining in the ETP system. A shortage of participating providers could result in limited customer choice locally or even statewide.

Under this waiver, ETPs will continue to collect and report performance data for all WIOA-funded participants in accordance with WIOA §116(d)(4)(A) and as specified at 20 CFR §677.230.

Goals:

- **Ease undue reporting burden on ETPs**

  Reporting performance data on all individuals engaging in a program of study (or the equivalent) consumes considerable time and expense. Reducing ETPs' reporting

requirements to include only WIOA-funded participants would save considerable time and expense to allow ETPs to focus on education and training outcomes while still providing the required data on WIOA-funded participants.

- **Ensure protection of non-WIOA participants' PII**

  Not reporting data for individuals who are not WIOA participants would reduce ETPs' liability for potential breach of those individuals' PII.

- **Ensure that local areas have sufficient numbers of, and diversity of, training providers**

  Establishing a more provider-friendly system will help ensure that local areas have sufficient numbers of, and diversity of, training providers necessary to create an effective marketplace of training programs for WIOA participants utilizing ITAs.

- **Incentivize training providers to participate in the ETP system**

  Minimizing the reporting burden and eliminating the need to provide sensitive data on non-WIOA-funded students would make ETP participation more attractive to training providers and would therefore help increase the number of new ETPs and retain providers that are already participating in the ETP system.

- **Ensure accuracy of performance data**

  Eliminating reporting barriers and limiting reporting to only WIOA-funded participants would result in more consistent and more accurate provider performance data.

- **Maximize customer choice**

  A provider-friendly ETP system attracts more training providers, resulting in increased customer choice.

Programmatic Outcomes:

Approval of this waiver would reduce the reporting burden on ETPs and allow them to focus more time and resources on producing successful outcomes for WIOA-funded participants as well as for their non-WIOA students.

<u>Department of Labor's policy priorities</u>

This waiver aligns with DOL's policy priorities in that it:

- connects education and training strategies by reducing the reporting burden on ETPs, thus allowing them to focus more time and resources on producing successful outcomes for WIOA-funded participants; and
- further protects the privacy rights of ETPs' students who are not WIOA participants.

Individuals impacted by the waiver

This waiver is intended to reduce the reporting burden on ETPs while still requiring them to report all required performance data for all WIOA-funded participants.

Process for monitoring waiver implementation progress

TWC will continue to collect data from ETPs on their WIOA-funded students and to submit that data via TWC's annual report to DOL.

Notice to affected Boards

TWC notified all Boards that the agency is seeking this waiver request and sought their input prior to submitting this request to the US Department of Labor Employment and Training Administration.

Public comment

To ensure meaningful public comment, including comments from business and organized labor, TWC will include this waiver request as part of the agency's WIOA plan modification when the plan modification is presented for public comment.

Waiver impact

Through this waiver, ETPs will be more willing to submit data on their WIOA-funded students and to remain in the ETP program, thus allowing the Texas workforce system to continue delivering essential training services that meet the needs of employers, job seekers, and workers.

WAIVER REQUEST 7

Reallocation Waiver

Statutory and regulatory provisions to be waived

The Texas Workforce Commission (TWC) is seeking a waiver from the provisions of the Workforce Innovation and Opportunity Act (WIOA) §128(c)(3) and §133(c), regarding reallocation among local areas. This waiver would provide flexibility to TWC in redistributing funds among workforce areas. Upon approval, this waiver, through administrative efficiencies, will allow for the opportunity to further workforce system integration. Texas' prior waiver request regarding reallocation provisions under WIOA §128(c)(3) and §133(c) and the provisions of 20 CFR §667.160 was approved by the US Department of Labor Employment and Training Administration (DOLETA) on June 23, 2016, and remains in place through June 30, 2018. TWC is requesting an extension of this waiver upon expiration.

Actions taken to remove state or local statutory or regulatory barriers

There are no state or local statutory or regulatory barriers to implementing the requested waiver. TWC regulations and policy statements are in compliance with current federal law.

Waiver goals and expected outcomes

TWC requests to continue this waiver of the WIOA statutes relating to the redistribution of recaptured local funds and proposes to base the redistribution of WIOA funds on TWC's

allocation rules (40 TAC §§800.51-800.75). TWC ensures that financial reporting will be consistent with current DOLETA requirements and that federal funds will be effectively managed for maximum service provision and program performance.

Goals:

- **Redistribution of recaptured funds to workforce areas based on factors established by TWC**

  The waiver request also allows TWC to ensure that funds are redistributed to those workforce areas with the greatest need. In doing so, TWC will determine the amounts to be redistributed to workforce areas based on factors such as:

  - requested amount;
  - demonstrated need for and ability to use additional funds to serve low-income individuals, public assistance recipients, dislocated workers, and unemployment insurance claimants;
  - demonstrated capacity to expend the formula funds;
  - a Board's established plan for working with at least one of the governor's industry clusters, as specified in the Board's plan; and
  - performance in the current and prior program years.
- **Facilitation of maximum expenditure of recaptured federal funds**

  TWC seeks to redistribute workforce funds to workforce areas that have achieved not only targeted expenditure levels but also established performance targets. Redistributing funds based solely on whether a workforce area achieves its expenditure target does not address performance issues, such as whether the workforce area met employers' needs for a highly skilled and job-ready workforce.

- **Improvement of administrative efficiencies**

  Approval of this waiver will serve to minimize administrative processes and costs of contracting by using similar redistribution procedures that support workforce system integration.

Programmatic Outcomes:

The statutory reallocation requirements can be fulfilled; however, the amount of funds available for reallocation may be so small that it is cost prohibitive. By using TWC's allocation rules for the redistribution of funds, TWC can ensure that federal funds will be more effectively and efficiently managed for maximum service provision and program performance. Approval of this waiver may not result in significantly higher performance outcomes, but it will provide the opportunity for recaptured funds to be redistributed to workforce areas where the greatest potential impact may be realized. This waiver will streamline administrative practices, allowing for greater efficiency in meeting the workforce development needs of employers and job seekers. Furthermore, it will enhance the quality of services in those workforce areas that have demonstrated consistent performance outcomes. Approval of this waiver will result in a reduction of unnecessary administrative processes.

Individuals impacted by the waiver

Workforce areas that provide quality services will have access to additional resources to meet the employers' needs, job seekers, and incumbent workers. Additionally, the waiver will allow TWC to continue to promote the cost benefits of improved administrative efficiencies, encouraging the increased leveraging of resources within the workforce areas. As a result, TWC will increase services such as enhanced education, employment, and training opportunities for disadvantaged populations and individuals with multiple barriers to employment.

Process for monitoring waiver implementation progress

TWC has a monitoring and performance accountability system that measures results for employers and other customers using the Texas workforce system. TWC continuously analyzes performance reports and compares actual performance with contracted targets. TWC will continue to adjust monitoring performance requirements to ensure that performance goals and objectives are met for WIOA services, including those programs created through the use of this waiver. TWC will monitor progress under this waiver by reviewing monthly expenditure and performance reports submitted by the Local Workforce Development Boards (Boards), through regularly scheduled conference calls with Board executive directors, and through its monitoring and performance accountability system.

In June 2006, TWC adopted rules to integrate our deobligation and reallocation policies for all Board-administered funds, thus establishing consistent procedures to apply to all workforce funds administered by the Boards, in support of a fully integrated system.

- Deobligations have a multilevel review:
  - Expenditures are reviewed monthly (performance is also considered).
  - If expenditures are trending low, staff provides technical assistance to the Boards.
  - Boards are given an opportunity to get expenditures back on track.
  - When it becomes clear that Boards will not be able to meet the expenditure benchmark, discussion regarding the possible deobligation occurs and we receive concurrence from the Board executive directors that they will not be able to use the funds.
  - Final action is taken in a public Commission meeting.
- Reallocations have a multilevel review:
  - Expenditures are reviewed monthly (performance is also considered).
  - If expenditures are trending high, staff provides technical assistance to the Boards:
    - Boards are given an opportunity to explain why expenditures appear to be high.
    - Boards may identify that the numbers of participants to be served is higher than anticipated and additional funds are needed.
    - Staff verifies through the performance reports that the number of participants is consistent with the Board's explanation of need.
  - Final action is taken in a public Commission meeting.

This process has worked well for several years with all Board-administered funds. This same process for reallocation would be used for WIOA funds upon approval of the waiver.

Notice to affected Boards

TWC notified all Boards that the agency is seeking this waiver request and sought their input before submitting this request to DOLETA.

Public comment

To ensure meaningful public comment, including comments from business and organized labor, TWC will include this waiver request as part of the agency's WIOA plan modification when the plan modification is presented for public comment.

Waiver impact

Since its initial approval November 17, 2010, under WIA and then under WIOA in 2016, this waiver has provided TWC the flexibility to redistribute recaptured funds to workforce areas where the greatest potential may be realized, thus ensuring more effective and more efficient use of federal funds. TWC will continue to apply this strategy and monitor outcome success.

TITLE I-B ASSURANCES

The State Plan must include assurances that:

1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient; Yes

2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist; Yes

3. The state established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members. Yes

4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2). Yes

5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership. Yes

6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions. Yes

7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7). Yes

8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan. Yes

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

10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report. Yes

11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3); Yes

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

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

A. EMPLOYMENT SERVICE PROFESSIONAL STAFF DEVELOPMENT.

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

Wagner-Peyser-funded ES staff receives professional development training at new employee orientation and yearly continuing education classes and on an as needed basis, to ensure staff is prepared and able to provide high-quality services to both job seekers and employers. Performance is monitored closely; as needs arise, Boards may respond with staff development activities, such as classroom instruction, webinars and one-on-one training.

In 2003, TWC implemented the “Texas Model” for the delivery of ES services, which restructured the oversight and responsibility for ES state merit staff. Under the Texas Model, Boards and their Workforce Solutions Offices have full responsibility for day-to-day guidance of state ES staff. TWC still maintains administrative responsibility, but Workforce Solutions Office managers share responsibility for directing daily work assignments, assigning individual performance goals, coordinating hiring, initiating disciplinary action, and evaluating staff performance.

Placing responsibility for ES staff with Workforce Solutions Offices supports an integrated workforce system. Many of the services provided by ES and WIOA are similar; the Texas Model gives Boards and their contractors the opportunity and flexibility to design integrated services, regardless of the program from which they are funded. All direction and guidance given to ES employees must be consistent with the provisions of state and federal laws, rules, and regulations governing the administration and delivery of the ES program. TWC provides technical support and quality assurance to Boards and contracted service

providers through local Integrated Service Area Managers (ISAMs). ISAMs serve as the TWC supervisors for Texas Model staff. ISAMs coordinate all Texas Model staff-related actions with Boards and their contractors.

ES staff receives mandatory professional development training at new employee orientation and biannually and annually, and on an as needed basis, to ensure staff is prepared to provide high quality services to both job seekers and employers. ES staff receives training on how to conduct a job search, customer service, and how to use WorkInTexas.com. Performance is monitored closely; as needs arise, Boards may respond with staff development activities, such as classroom instruction, webinars, and one-on-one training.

2. DESCRIBE STRATEGIES DEVELOPED TO SUPPORT TRAINING AND AWARENESS ACROSS CORE PROGRAMS AND THE UNEMPLOYMENT INSURANCE (UI) PROGRAM, AND THE TRAINING PROVIDED FOR EMPLOYMENT SERVICES AND WIOA STAFF ON IDENTIFICATION OF UI ELIGIBILITY ISSUES AND REFERRAL TO UI STAFF FOR ADJUDICATION.

Wagner-Peyser-funded ES staff receives professional development training at new employee orientation and yearly continuing education classes and on an as needed basis, to ensure staff is prepared and able to provide high-quality services to both job seekers and employers. Performance is monitored closely; as needs arise, Boards may respond with staff development activities, such as classroom instruction, webinars and one-on-one training.

In 2003, TWC implemented the "Texas Model" for the delivery of ES services, which restructured the oversight and responsibility for ES state merit staff. Under the Texas Model, Boards and their Workforce Solutions Offices have full responsibility for day-to-day guidance of state ES staff. TWC still maintains administrative responsibility, but Workforce Solutions Office managers share responsibility for directing daily work assignments, assigning individual performance goals, coordinating hiring, initiating disciplinary action, and evaluating staff performance.

Placing responsibility for ES staff with Workforce Solutions Offices supports an integrated workforce system. Many of the services provided by ES and WIOA are similar; the Texas Model gives Boards and their contractors the opportunity and flexibility to design integrated services, regardless of the program from which they are funded. All direction and guidance given to ES employees must be consistent with the provisions of state and federal laws, rules, and regulations governing the administration and delivery of the ES program. TWC provides technical support and quality assurance to Boards and contracted service providers through local Integrated Service Area Managers (ISAMs). ISAMs serve as the TWC supervisors for Texas Model staff. ISAMs coordinate all Texas Model staff-related actions with Boards and their contractors.

ES staff receives mandatory professional development training at new employee orientation and biannually and annually, and on an as needed basis, to ensure staff is prepared to provide high quality services to both job seekers and employers. ES staff receives training on how to conduct a job search, customer service, and how to use WorkInTexas.com. Performance is monitored closely; as needs arise, Boards may respond with staff development activities, such as classroom instruction, webinars, and one-on-one training.

UI claimants and employers are priority customers at Workforce Solutions Offices. Staff must promptly assist claimants and employers wishing to use Workforce Solutions Office resources to transmit materials to TWC for claims and appeals adjudication purposes. Customers must also be given access to space and telecommunications equipment necessary to participate in UI hearings. Additionally, staff supports customers with dedicated resources—computers, telephones, and printed materials about claim filing and UI rights and responsibilities. Occasionally, staff will encounter situations in which they need to speak with a claims specialist on behalf of a claimant. Each local Board has a dedicated phone number specifically for staff to use in these situations. These dedicated phone numbers are only available to staff to assist UI claimants in special circumstances.

TWC's *Employment Service (ES) Guide* provides information on recognizing potential UI eligibility issues, provides the proper procedure for referring issues to the UI department for adjudication, and outlines the able, available, and work search requirements claimants must meet. As part of the work test requirement, staff must enter services into the WorkInTexas.com job matching system, which transmits job contact outcomes to the UI Benefits system. The ES Guide lists the specific outcomes that are automatically reviewed by the UI Benefits system, and specifies other potential issues that require manual communication with UI.

TWC uses a "Potential UI Eligibility Issue Reporting Template" that lists examples of issues that could affect a claim and serves as a vehicle for reporting these potential issues. The ES Guide also outlines activities staff must complete when assisting UI customers.

In addition to the ES Guide, TWC provides training on UI claim investigations and eligibility issues as part of the UI Starter Kit. This toolkit has information on the Workforce and UI partnership, including services ES staff should provide to UI claimants, the claimant's responsibilities, and the process for identifying and reporting potential issues.

B. EXPLAIN HOW THE STATE WILL PROVIDE INFORMATION AND MEANINGFUL ASSISTANCE TO INDIVIDUALS REQUESTING ASSISTANCE IN FILING A CLAIM FOR UNEMPLOYMENT COMPENSATION THROUGH ONE-STOP CENTERS, AS REQUIRED BY WIOA AS A CAREER SERVICE.

UI claimants and employers are priority customers at Workforce Solutions Offices. Staff must promptly assist claimants and employers wishing to use Workforce Solutions Office resources to transmit materials to TWC for claims and appeals adjudication purposes. Customers must also be given access to space and telecommunications equipment necessary to participate in UI hearings. Additionally, staff supports customers with dedicated resources—computers, telephones, and printed materials about claim filing and UI rights and responsibilities.

TWC commented on the proposed regulation implementing WIOA that requires the Workforce Solutions Office to provide "meaningful assistance," which is defined as providing assistance on-site by staff well trained in UI claim-filing or providing assistance by phone or other technology, as long as it is provided by trained and available staff within a reasonable time. It is the state's position that this proposed regulatory language exceeds the statutory provision.

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

Wagner-Peyser-funded ES staff located in the Workforce Solutions Offices serves all customers. However, TWC has made UI claimants a priority population and, in so doing, staff is charged with improving claimant reemployment by connecting claimants with an array of relevant services and programs.

Among them, RESEA , which incorporates the DOLETA-approved statistical model based on the nationally recognized WPRS, used to analyze claimant characteristics, as well as Board-level economic indicators, to assess the likelihood of a claimant exhausting UI benefits. On a weekly basis, TWC provides each Workforce Solutions Office with the likely-to-exhaust score of every individual who has received a first payment of UI benefits. Boards then determine the UI claimants to outreach for services and the type of reemployment services to provide. At a minimum, claimants called in under RESEA must receive six services, to include registration with the state labor exchange for job search, RESEA orientation, an employment plan, UI eligibility assessment, individualized labor market information, and at least one additional career service.

D. DESCRIBE HOW THE STATE WILL USE W-P FUNDS TO SUPPORT UI CLAIMANTS, AND THE COMMUNICATION BETWEEN W-P AND UI, AS APPROPRIATE, INCLUDING THE FOLLOWING:

1. COORDINATION OF AND PROVISION OF LABOR EXCHANGE SERVICES FOR UI CLAIMANTS AS REQUIRED BY THE WAGNER-PEYSER ACT;

Texas benefits from the joint-administration of the UI program and workforce services by TWC, which allows efficient coordination between programs. Computer linkages coordinate and provide services between WorkInTexas.com and the UI automation system. These links ensure that UI claimants who are required to register have done so, and that UI claimants comply with their work search requirements.

TWC also administers the UI work test requirement through the link between WorkInTexas.com and the UI automation system. This linkage confirms that proper notification is provided when UI claimants fail to register for work or to comply with their work search requirements, including negative referral results or failure to report to a call-in or to employment. UI claimants who fail the UI work test are held ineligible for benefits until they meet their requirement. TWC's rules regarding UI claimants' work search requirements set a minimum weekly search effort, yet allow each Board to raise or lower the number depending upon the local labor market.

Although DOLETA defines "long-term unemployed" as someone who has been jobless for 27 weeks or longer, TWC strives to assist and place individuals in jobs before they reach that stage. TWC has developed a performance measure that tracks a Board's success in placing job seekers in employment within 10 weeks of their initial monetary eligibility. Boards achieve this measure by providing quality job posting and job development activities coupled with increased outreach to participants to ensure better applications and quality referrals.

To these ends, TWC uses the RESEA program to help claimants find new employment as quickly as possible. As mentioned above, all claimants who are outreached are required to attend an orientation and receive staff assistance in developing an individualized employment plan. Claimants are offered other staff-assisted services, too, including job referrals and job development activities to help in the work search. By contacting their Workforce Solutions Offices, or searching TWC's website (http://www.twc.state.tx.us/jobseekers/training-education), claimants can also find educational opportunities, occupational or vocational training, and other resources to help develop their skills.

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

Texas benefits from the joint-administration of the UI program and workforce services by TWC, which allows efficient coordination between programs. Computer linkages coordinate and provide services between WorkInTexas.com and the UI automation system. These links ensure that UI claimants who are required to register have done so, and that UI claimants comply with their work search requirements.

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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

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

Texas benefits from the joint-administration of the UI program and workforce services by TWC, which allows efficient coordination between programs. Computer linkages coordinate and provide services between WorkInTexas.com and the UI automation system. These links ensure that UI claimants who are required to register have done so, and that UI claimants comply with their work search requirements.

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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.

In Texas, one out of every seven working Texans (14 percent) is in an agriculture-related job. The average age of Texas farmers and ranchers is 58 years. Moreover, Texas has more women and minority farm operations than any other state in the nation. The unique needs of migrant and seasonal farmworkers (MSFWs) are best understood in light of Texas' agricultural activity.

The economic impact of Texas agriculture on the national scene is significant. Texas is the third-leading agricultural-producing state overall, behind California and Iowa. Texas leads the nation in the number of farms and ranches, with 241,500 covering nearly 130 million acres, and leads the nation in value of farm real estate. Additionally, Texas leads the nation in the production of cattle, cotton, hay, sheep, goats, wool, and mohair.

Rural lands, including privately owned forest, total 144 million acres, 86 percent of the state's total land area. Twelve percent of Texas' population resides in rural areas and 98.5 percent of Texas farms and ranches are family farms, partnerships, or family-held corporations.

According to the National Agricultural Statistics Service, U.S. Department of Agriculture (USDA), Texas Department of Agriculture, and Texas A&M AgriLife Extension Service, the

top 10 sources of cash receipts from the sale of U.S.-produced farm commodities are cattle and calves, broilers, dairy products, cotton, greenhouse and nursery, corn, chicken eggs, grain sorghum, wheat, and hay. The economic impact of the food and fiber sector totals more than $100 billion annually, and cash receipts, including timber, average $24.1 billion annually. Additionally, Texas totaled nearly $6.27 billion in agricultural exports to foreign countries during 2016.

Texas' National Rank for Selected Commodity Exports, 2016:

1	Cotton	$1.8 billion
2	Beef	$842 million
3	Hides and skins	$201 million
3	Cattle	$160 million
3	Pecans	$85 million
5	Rice	$66 million
6	Poultry meat	$202 million
6	Milk and milk products	$252 million
7	Fresh vegetables	$73 million
8	Feeds and fodders	$331 million
9	Grain products	$142 million
10	Wheat	$177 million
10	Fresh fruits	$42 million
11	Corn	$247 million
14	Pork	$60 million

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.

Texas Agricultural Regions

Texas ranked sixth overall in value of agricultural exports in 2012, and eighth in fresh vegetable production, accounting for 3.0 percent of the U.S. total. Texas' fresh vegetable production was valued at $290 million in terms of cash receipts that same year. The leading counties for vegetable acres harvested were Hidalgo, Starr, and Cameron. Other important counties were Frio, Uvalde, Duval, Webb, Hale, and Zavala. Texas also ranked tenth in fruit and tree nut production with production valued at $283 million.

Land preparation, planting, irrigating, and harvesting are ongoing activities. Therefore, agricultural employment occurs at numerous locations and at any time during the year. Usually, employment for farmworkers begins in the Lower Rio Grande Valley region, served by the Lower Rio Grande Valley and Cameron County Workforce Development Boards (Boards), and the Winter Garden and South/Central region, served by the Middle Rio Grande Board, and moves northward to the Texas Panhandle as the agricultural season progresses. Workers who follow this crop pattern may also migrate to other states.

Review of Prior Year's Agricultural Activity in Texas

For the Program Year 2016 (PY'16) Agricultural Outreach Plan (Plan), TWC has used the last complete and readily available data. Although Texas regions support a wide variety of agricultural activities, data is not collected by a single entity using consistent time frames and methodologies. Data is limited for agricultural activities such as producing wheat, grain, and other crops, and labor demand production such as cotton ginning. Furthermore, available data sources do not collect production and forecast data based on a federal program year; for the purposes of this plan, calendar years are used when there is no other data available. TWC is working with agricultural associations and other sources to improve on the data available for future plans.

Table 1 summarizes the agronomic crop production statistics for each of Texas' primary growing regions for Calendar Year 2015 (CY'15) and CY'16. CY'17 data is currently unavailable. Regional production statistics for horticultural crops are also unavailable at this time. For agronomic crops, the vast acreages of grain and row crops in the high plains and rolling plains make up most of the 11.3 million acres planted in the plains region. The eastern region of the state accounted for the bulk of the rest of agronomic crop production in Texas. Agronomic crops are typically less labor intensive, because more capital machinery is used in planting and harvesting as compared to most horticultural crops.

All data are from National Agricultural Statistics Service, USDA, and Texas A&M AgriLife Extension Service.

Table 1. Texas Agronomic Crop Acreage Estimates by Region, 2015-2016

Region	Area Planted (in acres) in 2015	Area Planted (in acres) in 2016	Area Harvested (in acres) in 2015	Area Harvested (in acres) in 2016	Main Crops
Lower Rio Grande Valley	475,600	570,400	469,100	562,300	corn, cotton, sorghum, sugar cane

Region	Area Planted (in acres) in 2015	Area Planted (in acres) in 2016	Area Harvested (in acres) in 2015	Area Harvested (in acres) in 2016	Main Crops
Winter Garden and South/Central	1,357,300	1,376,400	986,400	1,008,400	corn, cotton, sorghum, wheat
Plains	10,406,500	10,106,000	7,809,100	7,591,800	corn, cotton, peanuts, sorghum, wheat
Far West	539,100	521,100	525,400	446,100	cotton, wheat
Eastern	3,508,900	3,485,800	2,778,400	2,959,600	corn, cotton, rice, sorghum, soybean, wheat
Other, Not Specified	330,800	258,000	236,900	162,100	
State Totals	**16,618,200**	**16,317,700**	**12,805,200**	**12,729,700**	

Source: Data is from the National Agricultural Statistics Service, USDA.

Review of the Prior Year's Agricultural Worker Activity in Texas

The Lower Rio Grande Valley has the most labor-intensive production, accounting for the majority of horticultural crops in Texas, followed by the Winter Garden and South/Central regions. However, horticultural crops are grown throughout the state. **Table 2** provides data on Texas vegetable production and average monthly labor, with crop information for CY'15 and CY'16. Fruit and vegetable production is typically the most labor intensive.

Table 2. Texas Vegetable Production and Average Monthly Labor, 2015-2016

Crop	Calendar Year 2015 Acreage	Calendar Year 2015 Labor	Calendar Year 2015 Number of Months	Calendar Year 2016 Acreage	Calendar Year 2016 Labor	Calendar Year 2016 Number of Months
Citrus (1,000 Boxes)	7,949	4,707	8	7,583	4,490	8
Onions	4,000	577	4	8,200	1,184	4
Cucumbers	1,500	1,313	3	1,850	1,619	3

Crop	Calendar Year 2015 Acreage	Calendar Year 2015 Labor	Calendar Year 2015 Number of Months	Calendar Year 2016 Acreage	Calendar Year 2016 Labor	Calendar Year 2016 Number of Months
Cantaloupes	1,800	289	2	1,500	241	2
Watermelons	23,000	859	6	25,000	933	6
Cabbage	5,500	562	9	5,700	582	9
Tomatoes*	900	675	11	900	675	11
Spinach, Fresh	2,100	504	4	4,000	960	4
Squash	2,000	607	1	1,900	577	1
Peaches (Tons)	4,700	118	3	4,400	110	3
Carrots	1,000	41	3	1,200	49	3
Sweet Corn*	4,200	126	5	3,575	107	5
Pecans (1,000 Pounds)**	37,000	111	3	32,000	96	3
Honeydews*	600	67	2	600	67	2
Potatoes	18,200	268	4	19,600	288	4
Sweet Potatoes*	700	15	3	600	13	3
Chili Peppers	2,700	1,013	5	3,000	1,125	5
Bell Peppers*	95	160	6	95	160	6
Pumpkins*	724	27	N/A	724	27	N/A
Totals	69,133	12,060	-	78,555	13,326	-

* 2016 production acreage based on production data from prior year(s).

** Pecans are an alternate-year crop.

Projected Level of Agricultural Activity in Texas for the Coming Year

As seen nationally, some areas that historically have had high concentrations of agricultural work have experienced industry reduction relative to other types of work, such as in the oil and gas, construction, and retail industries. With that, there also has been a shift in the labor market. While some workers and their families who have long performed agricultural work are now being employed in nonagricultural industries, other workers are struggling to identify transferable skills that will allow them t**o obtain nonagricultural jobs.** A good example is the Eagle Ford Shale boom in the Winter Garden region and the Cline Shale in **west Texas.** Oil and gas employers have a relatively large d**emand for qualified employees.** Yet, they find few qualified applicants, in part because the local MSFW population lacks the relevant transferable skills and training. The industrial shift has

created a challenge for agricultural employers, as well. Texas is designated as an agricultural supply state, yet many agricultural employers face diminishing laborers to meet demand. With other employment options available that may be less physically taxing, and fewer immigration controls in place, more workers seek nonagricultural jobs. The state's major citrus growers' associations have expressed concern that the labor shortage is one of their most critical issues.

Projected Migrant and Seasonal Farm Workers (MSFW) in Texas

According to data from the National Agricultural Statistics Service, USDA, and Texas A&M AgriLife Extension Service, TWC estimates 289,600 MSFWs in the coming year. Although it is possible that jobs may be lost due to natural disasters and other adverse events, the number of MSFWs that reside in Texas is anticipated to escalate. Currently, there are more than 9,200 active agricultural employers in Texas, based on the North American Industry Classification System codes reported for each employer's unemployment insurance (UI) tax accounts.

Table 4 lists job postings for agricultural employers in Texas for PY'14 and PY'15.

Table 4 - Wagner-Peyser Act Services to Agricultural Employers

Agricultural Employers	PY '14[2]	PY '15
Job Postings[1]	2,410	1,081
Job Openings	14,309	6,325
Job Openings Filled	2,604	853
Percent Job Openings Filled	18.1%	13.5%

[1] Number of job postings does not accurately reflect the number of employers because employers may file multiple postings within a year. Each posting may contain multiple job openings.

[2] PY'14 and PY'15 data represents the July 1-June 30 period.

Agricultural Employers (H-2A Only)	PY'15[1]	PY'16[1]
H-2A Job Orders Received	517	524
H-2A Job Orders Certified	408	428

[1]PY'15 and PY'16 data represents the October 1-September 30 period.

There are several economic, natural, or other factors that affect agricultural production in the state. These are in no particular order of importance, and more than one issue may exist at any given time:

- The cost of fuel
- Secondary sources of income related to energy production
- Varied weather patterns, ie, going from really dry years to really wet years seems obviously has a huge impact, and with a state as large as Texas, that typically varies by part of state
- Tax policy as it relates to succession from generation to generation - the high average age of farmers is part of this issue
- Various environmental policies enforced by Environmental Protection Agency and Texas Commission on Environmental Quality
- The policy requirements for the agricultural industry established by the Food Safety Modernization Act
- Immigration law and enforcement, particularly as it impacts the availability of labor for fruit and vegetable production but also in other ag sectors
- Invasive species coming from other part of the U.S. or from other countries which can negatively impact the productive capacity of Texas agriculture
- The changing nature of U.S. agriculture domestic policy to a more crop insurance based program
- The conversion of agricultural land to developed land, whether for housing or commercial uses
- Water availability impacted by things like weather, the increased need for urban water, and issues related to the U.S.-Mexico water treaty

Economic Impact of Imported Fresh Produce from Mexico

Produce imports from Mexico fuel significant economic activity in the Lower Rio Grande Valley of Texas. The U.S. imported $7.78 billion of fresh and frozen produce, with more than 98 percent entering by land ports between Mexico and Texas, New Mexico, Arizona, and California. When considering only fresh fruits and vegetables, which is more than 90 percent of the total, imports reached $7.65 billion. About 45 percent of U.S. fresh fruit and vegetable imports worth $3.44 billion entered through Texas land ports. Over the next five to seven years, produce imports from Mexico are expected to grow with the majority of this growth coming into the U.S. through Texas.

Based upon a linear trend forecasting approach, as shown below in figure 2, it is estimated that U.S. produce imports from Mexico via truck will increase nearly 32 percent. Most of this growth will occur through Texas ports, with imports expected to grow in the Lone Star State by 62 percent. By 2020, Texas is projected to account for slightly more than half of all U.S. produce imports from Mexico. This growth in imports has implications throughout the border economy, and the Texas economy in particular.

Concurrently, U.S. interest rates are expected to rise, causing the dollar to appreciate, which may spur even more imports. The improvement to Mexican Federal Highway 40 between Mazatlán and Reynosa will reduce transportation time by six or more hours between Mazatlán and the Lower Rio Grande Valley and shave $500 to $1,500 off of truck transportation costs per load. Actual import data through mid-August 2013 revealed that

year-to-date total imports compared to 2012 are up by 13.8 percent; Texas is up by 26.2 percent. Fruit and vegetable imports from Mexico are projected to grow to 615,672 truckloads by 2020, or a 73.1 percent increase over 2012. Texas ports, mainly in the Lower Rio Grande Valley, will handle nearly 59 percent of these imports at 362,274 truckloads. Incorporating this information with input from industry experts from U.S. shippers and brokers and Mexican exporters, a revised forecast was developed as shown below in figure 3. This forecast incorporates a 30 percent growth rate for Texas imports for 2014 and 2015 before returning to the previous trend.

Figure 2.

Figure 3.

Estimated Economic Impact

The economic impact of produce imports on agricultural and farmworker activity in the State is compelling. Direct economic activity attributed to the produce import industry was $136.9 million during 2012, requiring an additional $148.6 million from supporting industries for a combined impact of $285.5 million. By 2020, this impact is expected to grow to $312.0 million in direct activity and $338.7 million in supporting activity for a total $650.7 million ripple throughout the Texas economy. Direct output will be led by the truck transportation and warehousing sectors ($90.6 million each), followed by sorting, grading and packing ($76.5 million) and customs brokers ($54.3 million).

About 6,920 jobs will be required across Texas to support import operations. Sorting, grading, and packing required 2,086 jobs; warehousing, 1,087 jobs; truck transportation, 746 jobs; and customs broker services, 450 jobs.

Table 3. Summary of Economic Activity from U.S. Produce Imports from Mexico over Land Borders, 2012 and 2020 Forecast with Industry Input

	2012	2020F
Total Truckloads	158,968	362,274
Direct Economic Output	Million Dollars	
Sorting, Grading and Packing	$33.6	$76.5
Truck Transportation	$39.7	$90.6
Customs Brokers	$23.8	$54.3
Warehousing	$39.7	$90.6

	2012	2020F
Total Direct Economic Output	$136.9	$312.0
Total Supporting Economic Output	$148.6	$338.7
Total Economic Output	$285.5	$650.7
Total Jobs Supporting Produce Imports	3,037	6,920

Source: Agricultural Marketing Service, USDA and Department of Agricultural Economics, Texas A&M University/Texas A&M AgriLife Extension Service/Texas A&M AgriLife Research

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.

MSFW Characteristics

MSFWs are a unique and very important segment of society and of the U.S. economy. The most recent statewide data from PY'14 is below and shows approximately the number of MSFWs by farmworker category:

Farmworkers	PY'16[1]Total Available for Service
Migrant	5,500
Seasonal	3,520
Year-round	4,520
Total MSFWs	8,344

Characteristics of MSFWs include the following:

- Education: the educational level among MSFWs tends to be low
- Language: general lack of ability to speak and read English and, at times, Spanish

- Economic Status: the income level of MSFWs frequently falls well below the poverty level
- Citizenship: large percentages are citizens of Mexico or of Mexican descent

Problems/issues facing MSFWs with disabilities include the following:

- The mobility of migratory workers, which often means that they do not remain in one location for a time sufficient to receive needed social services;
- A large majority of MSFWs lack command of the English language, therefore, they are unable to communicate effectively with social services counselors and other individuals involved in delivering much-needed services
- The limited vocational skills of many MSFWs
- No public transportation available in most rural communities
- Limited access to medical services to include available medical services during off-work hours (agricultural-seasonal cycle) and limited access to medical coverage.

Board staff and Workforce Solutions Office staff are also developing and sharing strategies to meet the following:

- Low skills in education/literacy/computers—Workforce Solutions Office staff is trained to identify signs and behaviors that indicate a job seeker with education/literacy/language barriers. Staff provides one-on-one assistance to those needing individual service.
- Additionally, Spanish-language brochures covering the range of services available are provided by Workforce Solutions Offices designated as MSFW-significant and bilingual. Highlighted services include adult education and literacy programs, which provide English language, math, reading, and writing instruction designed to help individuals succeed in the workplace, earn a high school equivalency diploma, and/or enter college or career training.
- Workforce Border Alliance—Boards throughout the Texas border region join together to overcome MSFW literacy/language barriers; the collaboration has resulted in creative and effective progress toward meeting the employment and public assistance needs of MSFWs.
- Regional Community Partnership Network Groups—MSFW Significant and Monolingual Workforce Solutions Offices plan to establish community network groups to strengthen the community resources available to MSFWs
- Workers lack transportation to the worksites—Board and Workforce Solutions Office staff work with local community- and faith-based organizations and other entities to provide temporary transportation services during peak production seasons.
- Child care for field workers—Workforce Solutions Office staff works with local community- and faith-based organizations and other entities to provide temporary child care during peak production seasons.
- Lack of trust in government/social service agencies and changes in local service delivery systems—Social service organizations sponsor fairs where Workforce Solutions Office staff provide information regarding local services available to farmworkers and their families. Fairs include attractions such as entertainment,

door prizes, and refreshments donated by participating and sponsoring entities. Other sponsored events include employer job fairs, all of which encourage trust and social capital between MSFWs and the outreach staff.

- Limited knowledge of social and workforce services—Workforce Solutions Office staff shares information with MSFWs regarding the public services of various entities in the local community.
- Board and Workforce Solutions Office staff simultaneously engage in developing partnerships with educational, housing, and support services, and other community assistance.
- Access to computer information and long distance telephone services—Boards provide computers in public locations (usually county courthouses or libraries) and encourage community- and faith-based organizations to refer farmworkers these resources. MSFWs can call Workforce Solutions Offices toll-free to inquire about or access services, too.
- Electronic service resources—Boards provide up-to-date information to agribusiness, rural areas, and colonies through online systems such as TWC's website and WorkInTexas.com. These systems ensure easy access to information and user-friendly data, and allow communication through public access automation points.

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.

Outreach Activities

The MSFW outreach program takes the full range of employment services directly to where MSFWs live and work, if and when they are unable to come to the Workforce Solutions Offices. The MSFW outreach program provides the framework necessary for Workforce Solutions Office staff to locate, contact, and enhance the employability of MSFWs in Texas. Outreach specialists may provide other assistance at the point of contact or at the Workforce Solutions Office. If needed services are not available through the Workforce Solutions Office, outreach specialists then make referrals to other agencies and organizations that provide appropriate assistance.

TWC and Workforce Solutions Offices' goals are to ensure that MSFWs are offered employment services, benefits and protections, including counseling, testing and job training referral services, qualitatively equivalent and proportionate to services provided to non-MSFWs. Outreach specialists assist with work registration and job leads, information about the complaint system and assistance with submitting complaints and referrals for supportive services. Outreach specialists in certain Workforce Solutions Offices have iPads and laptops, and thus are better equipped to provide live job searches and job posting referrals.

Year-round outreach activities are conducted in MSFW-significant Workforce Solutions Offices. Workforce Solutions Office staff responsible for outreach gains familiarity with the labor market and needs of local MSFWs. To be most effective, outreach specialists must understand the issues unique to MSFWs and have English and Spanish speaking capability.

Outreach specialists endeavor to do the following:

- Contact MSFWs to explain the services available at Workforce Solutions Offices;
- Notify MSFWs of job openings and of their rights and benefits under state and federal employment-related laws;
- Provide information on the employment service complaint system, including sexual harassment;
- Assist MSFWs in filing work registrations/applications, preparing worker complaints, and arranging appointments and transportation;
- Provide information about services available through electronic means and how to access this information;
- Identify qualified MSFWs seeking employment, according to guidelines of the federal regulations at 20 CFR Parts 651, 653, and 658. The initial and follow-up outreach contacts are made to assist MSFWs in becoming employed or improving their employability;
- Contact agricultural and nonagricultural employers, program operators, community- and faith-based organizations, and education and training providers on behalf of MSFWs;
- Present information to school students about migrant education programs in the state;
- Outreach with local public and private community agencies and MSFW organizations to establish community referral networks;
- Provide advocacy group presentations;
- Coordinate with other office partners in serving MSFWs;
- Distribute MSFW-assistance brochures;
- Perform joint outreach and recruitment missions with National Farmworker Jobs Program (NFJP) grantees;
- Attend staff training conducted by U.S. Equal Employment Opportunity Commission and DOLETA, Wage & Hour Division;
- Present and participate in meetings at the Texas A&M University, Colonias Program Center for Housing and Urban Development Community Centers (this includes the Promotora program);
- Solicit jobs, training opportunities, and employment-related services for MSFWs;
- Provide agricultural and nonagricultural employers with information, services, and assistance related to labor issues and needs;
- Accept job postings while performing outreach activities in the field;
- Refer MSFWs to the nearest Workforce Solutions Office and one-stop centers to receive services;
- Refer qualified MSFWs from the MSFW Outreach Log and from previous contacts through follow-up activities, if there is a job(s) available for referral
- Select qualified MSFWs from the MSFW Outreach Log and offer a job development to enhance the MSFWs' applications with additional/transferable occupational

skills, and matching options for nonagricultural jobs, when there are no job openings available for referral of MSFWs to suitable employment.

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.

To ensure that Outreach and Board staff receive technical assistance and professional development in order to improve services to MSFWs, training and technical assistance is provided and includes the following:

- MSFW equity performance indicators - proper identification and coding of MSFW customers
- Setting up local benchmark or baseline targets for Equity Indicators and Minimum Service Levels
- Strategies in strengthening collaboration with Workforce Solutions partners
- Workforce Solutions Office coordination and intake procedures
- Data collection requirements for reportable ES services
- MSFW carry-over applicants (WorkInTexas.com active file) and the impact on Equity performance measures
- Staff training conducted by the U.S. Equal Employment Opportunity Commission, Office of the Attorney General, Human Trafficking section; by Texas Rio Grande Legal Aid, Inc., which provides legal services to farmworkers; and by DOLETA Wage and Hour Division
- Employment Service and Employment-Related Law Complaint System
- Agricultural employer seminars throughout the regions
- Yearly staff training conducted by the state monitor advocate
- Employment Service Guide rescission to WD 26-07
- Migrant and Seasonal Farmworker Program: Service Delivery, Outreach and Reporting
- WD 41-10 National Electronic Job Registry for H-2A Temporary Agricultural Job Posting
- Complaint procedures related to MSFWs to include informal resolution
- Program integration strategies for MSFW
- Agricultural Recruitment System procedures and consequences
- Establishing local community partnerships (e.g., bringing community groups together formalizing the traditional migrant subcommittee groups, coalition meeting groups)
- Identifying opportunities to co-enroll/integrate program design with Motivation Education and Training, Inc. (MET), WIOA §167, National Farm Worker Jobs Program Grantee with other center services

- Efforts to develop local, regional, and state planning strategies in the agricultural industry with emphasis on supply and demand areas of the state for workers
- Coordinate agricultural business forums. The intended focus of these forums would be relative to pertinent issues that affect both agricultural employers and workers to include laws that affect the agricultural industry sector.
- Coordinate a pre-harvest forum for MSFWs through the migrant education, workforce, community, and farm worker organizations
- Facilitate and coordinate the engagement of the agricultural industry into the workforce investment system, assist in the creation of jobs within the agricultural industry (permanent/year-round) and determine the viable need for a skilled workforce in an effort to increase wage gain earners;
- Develop strategies to increase opportunities for the MSFW summer youth program to implement goals and objectives that include a tracking system, co-enrollment, and coordination with MET's youth program

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.

The Texas workforce system supports the delivery of core services within local communities to assist those individuals who need education and training in order to obtain the basic skills that will enable them to obtain sustainable employment and become self-sufficient. Workforce Solutions Office staff receives professional development activities to ensure each staff member is knowledgeable about core programs to provide high-quality services to both job seekers and employers. This includes core programs such as UI assistance for MSFWs returning from other parts of Texas or the nation.

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.

To ensure that Workforce Solutions Office outreach staff and Board staff receive technical assistance and professional development in order to improve services to MSFWs, training and technical assistance is provided to include the following:

- MSFW equity performance indicators—proper identification and coding of MSFW customers
- setting up local benchmark or baseline targets for Equity Indicators and Minimum Service Levels performance measures
- strategies in strengthening collaboration with Texas Workforce Solutions partners and other organizations serving MSFWs in the area
- basic summary of farmworker rights; OSHA's Water, Rest, and Shade initiatives; migrant education programs; and other supportive service programs throughout Texas and the nation
- Workforce Solutions Office coordination and intake procedures
- MSFW carry-over applicants (active file in WorkInTexas.com) and the impact on Equity performance measures
- MSFW Program: service delivery, outreach, and reporting

- WD Letter 41-10, National Electronic Job Registry for H-2A Temporary Agricultural Job Posting
- complaint procedures related to MSFWs to include informal resolution
- program integration strategies for MSFWs
- Agricultural Recruitment System (ARS) procedures and consequences
- establishing local community partnerships (e.g., bringing community groups together formalizing the traditional migrant subcommittee groups and coalition meeting groups)
- identifying opportunities to co-enroll/integrate program design with Motivation Education and Training, Inc. (MET), Workforce Innovation and Opportunity Act (WIOA) §167, NFJP grantee with other Workforce Solutions Office services
- efforts to develop local, regional, and state planning strategies for workers in the agricultural industry, with emphasis on supply and demand areas of the state
- coordinate agricultural business forums and compliance seminars. The intended focus of these forums would be relative to pertinent issues that affect both agricultural employers and workers to include laws that affect the agricultural industry sector
- the Texas workforce system and MET participate in joint outreach and recruitment efforts designed to identify additional clients and immediately expand the range of available services for MSFWs
- coordinate a pre-harvest forum for MSFWs through the migrant education, workforce, community, and farmworker organizations
- facilitate and coordinate the engagement of the agricultural industry into the workforce investment system, assist in the creation of jobs within the agricultural industry (permanent/year-round), and determine the viable need for a skilled workforce in an effort to increase wage gain earners
- develop strategies to increase opportunities for the MSFW summer youth program to implement goals and objectives that include a tracking system, coenrollment, and coordination with MET's youth program

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

The State's Strategy

Coordination with the U.S. Department of Labor's National Farmworker Jobs Program (NFJP) grantees and other agencies and groups

TWC entered into a statewide memorandum of understanding (MOU) with Motivation Education and Training, Inc. (MET), effective January 31, 2014, and extended through February 28, 2019. As the DOLETA designated grantee, MET operates NFJP in Texas. This MOU assists in establishing and demonstrating effective outreach coordination coupled with increasing registration activities by MET staff and ES staff. TWC and MET are revising the MOU to reflect WIOA language and support and improve coordination, joint outreach responsibilities, core programs, and performance accountability measures.

Referral and placement of the MSFW customer remains a challenge for states' workforce system. The ability to share responsibility for this constituency and efficiently coordinate available resources can leverage local areas' mutual capacities as well as improve the

customer service experience. Texas encourages co-enrollment of MSFW customers in services provided by TWC, the Boards, and MET. The state monitor advocate examines co-enrollment activity during an annual review of each MSFW-significant Workforce Solutions Office.

The advantages of TWC's statewide MOU with MET include the following:

- A streamlined information exchange process, which improves the currency and accuracy of shared information
- Coordinated activity among organizations, including immediate services
- Planned participation in joint outreach and recruitment efforts designed to increase customer identification, and expand services for MSFWs
- Increased staff awareness about emerging issues within the MSFW community
- A vehicle for periodic review and assessment of the quality of services

TWC and the Workforce Solutions network continue to increase co-enrollments with its NFJP partner. This collaborative effort has help to expand the opportunities available for MSFW customers.

TWC's state monitor advocate (SMA) meets quarterly with MET, Inc., to discuss improving coordination and administration of the employment and training services offered to MSFWs. Additionally, the SMA meets regularly with the local MET, Inc., staff during the MSFW monitoring reviews at the local level to discuss new and improved shared responsibility.

This streamlined approach allows new and improved client programs to receive immediate intervention and fully integrate all programs with the Boards and contract managers. It also allows TWC to:

- provide Board oversight to fully implement WIOA-required changes with our NFJP partner; and
- provide technical assistance and training on the Employment Service and Employment-Related Law Complaint System to local one-stop Workforce Solutions Office staff.

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:

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

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

Services for Farmworkers and Agricultural Employers

To meet agricultural employers' needs, Texas Workforce Solutions will continue to improve the agricultural referral process including, but not limited to, the following:

- Integrating services for farmworkers and agricultural employers and workers
- Identifying workers who are job-ready when arriving at the worksite
- Providing employers with industry information, farmworkers' rights, and support services
- Engaging agricultural employers to determine short- and long-term employment and training needs
- Qualitatively serving agricultural employers by creating local and regional economic employment opportunities for MSFWs
- Develop strategies to facilitate and coordinate the engagement of the agricultural industry into the workforce investment system, assist in the creation of jobs within the agricultural industry (permanent/year-round) and determine the viable need for a skilled workforce in an effort to increase wage gain earners
- Assisting employers in analyzing state and local peak production seasons and recruiting an adequate labor supply
- Collaborating and coordinating with the Texas Department of Agriculture, Rural Development, to increase viability and sustainability in agricultural areas of state

TWC has created a variety of communication resources to support Texas Workforce Solutions partners in providing meaningful service to agricultural employers and farmworkers. These communication resources are intended to help find solutions to their employment and training needs. TWC provides these resources in several ways, such as the following:

- Electronic service
- Media and printed information
- Organizational coordination

Additionally, TWC's Foreign Labor Certification (FLC) unit, Office of the Monitor Advocate (MA) and Boards partner with agricultural associations to provide educational seminars for employers and distribute information on various employment topics. TWC may assist in locating resources and speakers for these educational events.

Additionally, FLC also updates and publishes the Texas Directory of Farm and Ranch Associations. This publication lists contact information for state organizationswith agricultural business-interests. This and other resources are included on TWC's website http://www.twc.state.tx.us/svcs/agri/directory.pdf. Additionally, TWC's website links to numerous agriculture-related reports.

Agricultural employer and farmworker services are based on each Board's service delivery plan. The plan details programs the Board provides through Workforce Solutions Offices under its direction. Additionally, Boards have established Business Services Units (BSUs) to reach out to employers. BSUs strive to understand the needs of their business communities, including agricultural employers, by collaborating with MSFW outreach workers, community partners, chambers of commerce, and industry associations.

BSUs are charged with helping businesses recruit qualified farmworkers and job seekers gain employment suited to their skills. The Boards' address the following issues:

- Lack of transportation to worksites—Board and Workforce Solutions Office staff work with community- and faith-based organizations and other entities to provide temporary transportation services during peak agricultural seasons.
- Limited knowledge of state/federal employment laws and regulations—Workforce Solutions Office staff hosts forums to educate employers and agricultural crew leaders on state/federal laws and regulations.
- Lack of efficient use of local human resources—Workforce Solutions Office staff facilitates communication between growers, such as cooperatives, on farmworkers' specific needs. One resource is the AgriLife county extension agent.
- Lack of skilled workers—Workforce Solutions Office staff coordinates short-term training on local crops and farming (e.g., forklift certification, food safety, and commercial driver's license (CDL)).
- Lack of facilities/staff to screen and interview potential farmworkers—Workforce Solutions Office staff provides space in the Workforce Solutions Office for agricultural employers to interview workers. Workforce Solutions Office staff also provides intake and referral activities at the growers' locations.
- Limited administration of farm labor contractors—Workforce Solutions Office staff provides forms and instructions for completing crew leader registration and ensures that farm labor contractors' registration cards are current and maintains a crew leader logs in the offices.
- Limited or in adequate housing—The Agricultural Recruitment System (ARS) requires employers to provide no-cost housing to workers who cannot reasonably return to their place of residence after work each day. This is one of the challenges employers face when using ARS, especially in providing housing options suitable for families. TWC participates in MET's Regional
- Farmworker Housing Summit; MET is the housing grant coordinator for the NFJP grantee under the WIOA §167 housing grant for Texas. This regional summit illustrates the valuable collaboration undertaken with housing authority municipalities and nonprofits throughout Texas.

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

TWC partners with agricultural associations to provide educational seminars for employers and distributes information on various employment topics, such as the ES and Employment-Related Law Complaint System. TWC may assist in locating resources and speakers for these educational events. Through these seminars and other interactions with agricultural employers, TWC strives to expand and improve services.

In collaboration with other TWC areas, these special units are a resource to help Boards implement strategies that increase coordination among federal and state agencies and private organizations. FLC and MA continue their efforts to encourage the use of the Agricultural Recruitment System (ARS) to link employers that need agricultural labor in Texas with the areas of the state that can potentially supply MSFWs. TWC continues to

encourage Boards to think of new and innovative ways to serve agricultural employers and engage communities in rural development.

Workforce Solutions Offices and the Office of the Monitor Advocate continue to market the ES and Employment-Related Law Complaint System at community-agency partnership meetings in areas of Texas that have significant MSFW populations, at training sessions and conferences conducted by the Human Trafficking Task Force, and at meetings and training sessions held by legal advocacy, state, and federal agencies, and community and faith-based organizations.

Outreach specialists assist with work registration and job leads, information about the ES and Employment-Related Law Complaint System, farmworker rights brochure, and submitting complaints and referrals for support services. Outreach specialists in certain Workforce Solutions Offices have iPads and laptops, and thus are better equipped to provide live job searches and job posting referrals.

Year-round outreach activities are conducted in MSFW-significant Workforce Solutions Offices. Workforce Solutions Office staff responsible for outreach gains familiarity with the labor market and needs of local MSFWs. To be most effective, outreach specialists must understand the issues unique to MSFWs and have English- and Spanish-speaking capability.

Outreach specialists:

- contact MSFWs to explain the services available at Workforce Solutions Offices;
- notify MSFWs of job openings and of their rights and benefits under state and federal employment-related laws
- provide information on the ES and Employment-Related Law Complaint System, including sexual harassment;
- assist MSFWs in filing work registrations/applications, preparing worker complaints, and arranging appointments and transportation;
- provide information about services available through electronic means and how to access this information;
- identify qualified MSFWs seeking employment, according to guidelines of the federal regulations at 20 CFR Parts 651, 653, and 658. The initial and follow-up outreach contacts are made to assist MSFWs in becoming employed or improving their employability;
- contact agricultural and nonagricultural employers, program operators, community- and faith-based organizations, and education and training providers on behalf of MSFWs;
- present information to school students about migrant education programs in the state;
- outreach with local public and private community agencies and MSFW organizations to establish community referral networks;
- provide advocacy group presentations;
- coordinate with other office partners in serving MSFWs;
- distribute MSFW-assistance brochures;
- perform joint outreach and recruitment missions with National Farmworker Jobs Program (NFJP) grantees;

- attend staff training conducted by U.S. Equal Employment Opportunity Commission and U.S. Department of Labor (DOL) Employment and Training Administration (DOLETA), Wage and Hour Division;
- present and participate in meetings with the Texas A&M University's Colonias Program and Center for Housing and Urban Development (this includes the Promotora program);
- solicit jobs, training opportunities, and employment-related services for MSFWs;
- provide agricultural and nonagricultural employers with information, services, and assistance related to labor issues and needs;
- accept job postings while performing outreach activities in the field;
- refer MSFWs to the nearest Workforce Solutions Office to receive services;
- refer qualified MSFWs from the MSFW Outreach Log and from previous contacts through follow-up activities, when there is a job or jobs available for referral; and
- when there are no job openings available for referral of MSFWs to suitable employment, select qualified MSFWs from the MSFW Outreach Log and offer a job development plan to enhance the MSFWs' applications with additional/transferable occupational skills, and matching options for nonagricultural jobs.

To meet agricultural employers' needs, Texas Workforce Solutions will continue to improve the agricultural referral process, including, but not limited to:

- integrating services for farmworkers and agricultural employers and workers;
- identifying workers who are job-ready when arriving at the worksite;
- providing employers with industry information, farmworkers' rights, and support services;
- engaging agricultural employers to determine short- and long-term employment and training needs;
- assisting employers in analyzing state and local peak production seasons and recruiting an adequate labor supply;
- collaborating and coordinating with the Texas Department of Agriculture, Rural Development, to increase viability and sustainability in agricultural areas of the state; and
- using the job-matching process for temporary agricultural work on an intrastate and/or interstate basis through ARS.*

*Texas is primarily a labor supply state for ARS.

TWC has created a variety of communication resources to support Texas Workforce Solutions partners in providing meaningful service to agricultural employers and farmworkers. These communication resources are intended to help find solutions to their employment and training needs. TWC provides these resources in several ways, such as:

- electronic service;
- media and printed information; and
- organizational coordination.

Additionally, TWC partners with agricultural associations to provide educational seminars for employers. FLC and/or the SMA distributes information on various employment topics

such as the Employment Service and Employment-Related Law Complaint System. TWC may assist in locating resources and speakers for these educational events. Through these seminars and other interactions with agricultural employers, TWC strives to expand and improve FLC and/or SMA services.

FLC also updates and publishes the *Texas Directory of Farm and Ranch Associations*. This publication lists contact information for state organizations with agricultural business interests.

This and other resources are available on TWC's website at http://www.twc.state.tx.us/svcs/agri/directory.pdf. Additionally, TWC's website links to numerous agriculture-related reports.

Agricultural employer and farmworker services are based on each Board's service delivery plan. The plan details programs that the Board provides through Workforce Solutions Offices under its direction. Additionally, Boards have established Business Services Units (BSUs) to reach out to employers. BSUs strive to understand the needs of their business communities, including agricultural employers, by collaborating with MSFW outreach workers, community partners, chambers of commerce, and industry associations.

BSUs are charged with helping businesses recruit qualified farmworkers and helping job seekers gain employment suited to their skills. The Boards address the following issues:

- Lack of transportation to worksites—Board staff and Workforce Solutions Office staff work with community- and faith-based organizations and other entities to provide temporary transportation services during peak agricultural seasons.
- Limited knowledge of state/federal employment laws and regulations—Workforce Solutions Office staff hosts forums to educate employers and agricultural crew leaders on state/federal laws and regulations.
- Lack of efficient use of local human resources—Workforce Solutions Office staff facilitates communication among growers, such as cooperatives, on farmworkers' specific needs. One resource is the AgriLife County Extension Agent.
- Lack of skilled workers—Workforce Solutions Office staff coordinates short-term training on local crops and farming (e.g., forklift certification, food safety, and commercial driver's license (CDL)).
- Lack of facilities/staff to screen and interview potential farmworkers—Workforce Solutions Office staff provides space in the Workforce Solutions Office for agricultural employers to interview workers. Workforce Solutions Office staff also provides intake and referral activities at the growers' locations.
- Limited administration of farm labor contractors—Workforce Solutions Office staff provides forms and instructions for completing crew leader registration, ensures that farm labor contractors' registration cards are current, and maintains crew leader logs in the Workforce Solutions Offices.
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summit illustrates the valuable collaboration undertaken with housing authority municipalities and nonprofits throughout Texas.

MSFWs in Texas often face poverty, low academic achievement, limited English proficiency, and inadequate job training and readiness, as well as various social problems. The Texas workforce system's approach focuses on those barriers to acquire and retain productive employment. To this end, Workforce Solutions Offices reaffirm existing community partnerships and continuously establish new community partnerships to meet the needs of local businesses and MSFWs, while providing job seekers with job search workshops, job placement services, referrals, and support services.

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

To meet agricultural employers' needs, Texas Workforce Solutions will continue to improve the agricultural referral process, including, but not limited to:

- integrating services for farmworkers and agricultural employers and workers;
- identifying workers who are job-ready when arriving at the worksite;
- providing employers with industry information, farmworkers' rights, and support services;
- engaging agricultural employers to determine short- and long-term employment and training needs;
- assisting employers in analyzing state and local peak production seasons and recruiting an adequate labor supply;
- collaborating and coordinating with the Texas Department of Agriculture, Rural Development, to increase viability and sustainability in agricultural areas of the state; and
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- electronic service;
- media and printed information; and
- organizational coordination.

Additionally, TWC partners with agricultural associations to provide educational seminars for employers. FLC and/or the SMA and distributes information on various employment topics such as the Employment Service (ES) and Employment-Related Law Complaint System. TWC may assist in locating resources and speakers for these educational events. Through these seminars and other interactions with agricultural employers, TWC strives to expand and improve FLC and/or SMA services.

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workforce system's approach focuses on those barriers to acquire and retain productive employment. To this end, Workforce Solutions Offices reaffirm existing community partnerships and continuously establish new community partnerships to meet the needs of local businesses and MSFWs, while providing job seekers with job search workshops, job placement services, referrals, and support services.

Boards receive assistance from TWC in implementing strategies that address these issues through coordination among federal and state agencies and private organizations. TWC's efforts encourage the use of ARS to link employers needing agricultural labor in Texas. Using ARS enables employers to recruit workers without the use of foreign labor, which is particularly critical in light of the cap on the number of H-2B workers allowed to obtain visas and the complexity of the H-2A process.

TWC also collaborates with Boards in developing innovative ways to serve agricultural employers and engage communities in economic and rural development. To these ends, TWC coordinates and facilitates Agricultural Employer Forums (Forums) in partnership with agriculturally significant areas of the state, including the Lower Rio Grande Valley, Middle Rio Grande, Upper Rio Grande, and South Plains Boards, and TWC's MA. The Forums are a cooperative effort between federal and state governments and the private sector to keep the public informed on pertinent issues that impact agricultural employers and workers. The Forums may cover laws that affect the agricultural sector, as well as provide education and outreach and information on regulations to spur greater compliance by employers and better working conditions for agricultural workers. Depending on the needs of agricultural associations and employers, the following agencies may participate:

- Texas Department of Agriculture
- Internal Revenue Service
- U.S. Social Security Administration
- U.S. Equal Employment Opportunity Commission
- U.S. Department of Justice/Office of Special Counsel
- Texas Health and Human Services Commission
- TWC's Tax Department
- DOL, Wage and Hour Division
- DOLETA
- U.S. Department of Homeland Security
- U.S. Immigration and Customs Enforcement
- MET, Inc.
- Agricultural institutions of higher education
- Local and regional water allotment and irrigation districts

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).

MSFWs in Texas often face poverty, low academic achievement, limited English proficiency, and inadequate job training and readiness, as well as various social problems. The Texas workforce system's approach focuses on those barriers to acquire and retain productive employment. To this end, Workforce Solutions Offices establish community partnerships to meet the needs of local businesses and MSFWs, while providing job seekers with job search workshops, job placement services, referrals, and support services.

Organizational Coordination

Boards receive assistance from the FLC and/or the SMA in implementing strategies that address these issues through coordination among federal and state agencies and private organizations. FLC's and/or the SMA's efforts encourage the use of the agricultural recruitment system to link employers needing agricultural labor in Texas with MSFW supply. Use of the agricultural recruitment system enables employers to recruit workers without the use of foreign labor, which is particularly critical in light of the cap on the number of H-2B workers allowed to obtain visas and the complexity of the H-2A process.

TWC also collaborates with Boards, in developing innovative ways to serve agricultural employers and engage communities in economic and rural development. To these ends, TWC coordinates and facilitates Agricultural Employer Forums (Forum) in partnership with agriculturally significant areas of the state, including the Lower Rio Grande Valley, Middle Rio Grande, Upper Rio Grande, and South Plains Boards, and TWC's state monitor advocate. The Forums are a cooperative effort between federal and state governments and the private sector to keep the public informed on pertinent issues that impact agricultural employers and workers. The Forums may cover laws that affect the agricultural sector, as well as provide education and outreach and information on regulations to spur greater compliance by employers and better working conditions for agricultural workers. Depending on the needs of agricultural associations and employers, the following agencies may participate:

- Texas Department of Agriculture
- Internal Revenue Service
- U.S. Social Security Administration
- U.S. Equal Employment Opportunity Commission
- U.S. Department of Justice/Office of Special Counsel
- Texas Health and Human Services Commission
- TWC's Tax Department
- U.S. Department of Labor, Wage and Hour Division
- U.S. Department of Labor, Employment and Training Administration
- U.S. Department of Homeland Security
- U.S. Immigration and Customs Enforcement
- MET, Inc.
- Agricultural institutions of higher education
- Local and regional water allotment and irrigation districts

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.

Transmission of the Combined State Plan (Plan) includes assurances that interested parties were given an opportunity to review and provide public comment on the Plan; such parties include, but are not limited to, WIOA §167 National Farmworker Jobs Program grantees, other appropriate farmworker groups, public agencies, agricultural employer organizations, and other interested employer organizations.

This agricultural outreach plan modification was posted for public comment on TWC's website for 30 days. No comments 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.

Performance Indicators Reflecting Equity

TWC will continue to work with Boards to maintain and improve performance for the equity ratio indicators and minimum service-level indicators. For the last several years, Texas met all five equity ratio indicators and continues to see strong performance in this area and five of the seven minimum service-level indicators were met for PY'16, as of June 30, 2017. During the state monitor advocate's visits in PY'16, the monitor discussed performance for these measures with Board management, Workforce Solutions Office management, and MSFW outreach staff. Boards with MSFW-significant Workforce Solutions Offices have received monitoring reports that recommend improvement and enhanced services delivery to MSFWs. Monitoring efforts during PY'17 have focused on the changes in performance resulting from the PY'13 recommendations.

Meeting the placement minimum service level indicators for PY'17 may pose challenges for TWC, as experienced in PY'16. The following conditions contribute to this challenge:

- Current MSFW minimum service level indicators place MSFW labor supply states, such as Texas, at a disadvantage. The high placement rate of 42.5 percent of registered MSFWs is unrealistic and unattainable, because of the mobility of MSFWs - many workers travel to take jobs in other states.
- Traditionally, MSFWs reside in areas that experience the highest rates of unemployment.

- Many states do not require UI claimants filing interstate claims to register in the local job matching system or to participate in the UI availability-for-work requirement.
- Wages are depressed in areas with high unemployment, pushing migration of local workers to other parts of the state and other states.
- Traditionally, much of the work performed by MSFWs has been paid on a piece-rate basis.

Performance standards are based on placements at an hourly rate, thus excluding placements paid by piece rate. Therefore, reported performance does not accurately reflect all activity in the wages at placement category. Workforce Solutions Office staff can increase placements and meet the minimum service level indicators by taking the following steps:

Develop strategies to serve MSFWs by:

- emphasizing services that will result in more MSFWs being placed in agricultural and nonagricultural jobs;
- providing local agricultural peak season plans to assist agricultural employers and engage in the agricultural sector, while creating job placement initiatives for MSFWs;
- referring MSFWs to Workforce Solutions Office services;
- stressing the use of electronic, self-service systems to encourage MSFWs take an active role in their job search.
- coordinate with Workforce Solutions Office partners to foster an effective outreach program—including maintenance of the MOU with MET and other farmworker organizations and community partners; and
- promote economically self-sustaining, year-round jobs through skills development under the National Farmworker Jobs Program (NFJP) MET and curriculum development with local community colleges.

MSFW-Significant Workforce Solutions Office Affirmative Action Plans

DOLETA has designated the Lower Rio Grande Valley in Raymondville, South Plains in Muleshoe and Borderplex in Horizon Workforce Solutions Offices as representing the top 20 percent of MSFW activity nationally. These Workforce Solutions Offices have developed and implemented affirmative action plans to ensure that staff continues to reflect the local MSFW population. Additionally, the following Workforce Solutions Offices have been designated as MSFW-significant and significant multilingual centers due to special circumstances: Lower Rio Grande Valley in Weslaco, Lower Rio Grande Valley in Edinburg, Lower Rio Grande Valley in Mission/Rio Grande City, Middle Rio Grande Eagle Pass and South Plains in Plainview/Floydada.

The composition of TWC's ES staff at these Workforce Solutions Offices has not significantly changed during the past 10 years; however, there has been some turnover in outreach specialists. TWC and the Texas workforce system have announced job vacancies through various farmworker organizations, including MET, TWC's NFJP partner. Most ES staff members are long-term employees who are familiar with the employment issues of MSFWs and are sensitive to their needs. Approximately 70 percent of ES staff in these significant locations have at one time worked in or been involved in agriculture and are familiar with

the industry. Staff has traditionally worked closely with outside agencies, organizations, and workforce service providers to coordinate services for MSFWs. Additionally, staff is familiar with ongoing agricultural activities and trends, employment-related issues, and the laws and regulations that protect this population.

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.

An assessment of progress is noted throughout this AOP section. The following explanation expands upon other achievements and achievement gaps of the previous AOP.

E. STATE MONITOR ADVOCATE

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

The Texas State Monitor Advocate (SMA) has had the opportunity to review and comment on the agricultural outreach plan, and has approved the plan as submitted. The SMA contributed to the design, scope, and priorities of this plan as a method of continuing to serve and meet the needs of Texas agricultural employers, workers, and industry.

WAGNER-PEYSER ASSURANCES

The State Plan must include assurances that:

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

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

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

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

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

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

A. ALIGNING OF CONTENT STANDARDS

Describe how the eligible agency will, by July 1, 2016, align its content standards for adult education with State-adopted challenging academic content standards, as adopted under

section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

In 2015, the Texas Workforce Commission (TWC) contracted the standards revision project. The contractor coordinated input from a spectrum of subject matter experts, including representatives from K-12 education, developmental education, adult education, Texas industries, and postsecondary institutions. The draft of the Texas AEL Content Standards was submitted to TWC on June 28, 2016, meeting the requirement that, by July 1, 2016, the state align its content standards for adult education with State adopted challenging academic content standards under the Elementary and Secondary Education Act of 1965, as amended, with curriculum aligned to new standards on October 1, 2016.

The revised AEL content standards are ambitious. They have the potential to push participants to reach new levels, and they are more closely aligned with the heightened expectations of the new high school equivalency assessments and with the needs of participants transitioning to and through postsecondary education. The revised standards align with the Texas Essential Knowledge and Skills (TEKS) state-adopted academic content standards, as adopted under §1111(b)(1) of the Elementary and Secondary Education Act of 1965 as well as the Texas College and Career Readiness Standards; the high school End-of-Course Exams for the State of Texas Assessments of Academic Readiness (STAAR); the Texas Certificate of High School Equivalency; and the Texas Success Initiative, the Texas college readiness assessment.

Beginning in 2017, TWC contracted to facilitate the addition of entry-level industry expectations to the AEL content standards. Industry experts work with TWC to align standards to the health care science; advanced manufacturing; construction and extraction; and transportation, distribution, and logistics industries. The incorporation of industry expectations into the standards will be completed in May 2018. With this change to the standards, TWC commits to providing AEL programs that are intended to support the preparation for and transition to training and employment in high-demand occupations.

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 any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

ADULT EDUCATION AND LITERACY ACTIVITIES (SECTION 203 OF WIOA)

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

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

Texas conducted a statewide competition of services in fall 2017 to fund contracts through June 30, 2020, with options for up to three one-year renewals.

In its request for proposals, Texas incorporated and specifically indicated the considerations specified in section 231(e) of WIOA as grant award requirements required of eligible providers. These considerations were scored as narrative questions of the proposal and offerors were required to provide narrative detail to demonstrate how they will meet each consideration.

All grant recipients are required to implement the following AEL activities:

Adult Education, including activities based upon the State's AEL content standards and the statutory definition in WIOA, which include academic instruction and education services below the postsecondary level that increase an individual's ability to:

- read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent;
- transition to postsecondary education and training; and
- obtain employment;

Literacy activities, including services for individuals with low-levels of literacy. These activities are aligned to the statutory definition in WIOA and include activities to support an individual's ability to read, write, and speak in English, compute, and solve problems, at levels of proficiency necessary to function on the job, in the family of the individual, and in society.

English Language Acquisition (ELA) activities,as defined in WIOA to 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. ELA activities address transition requirements outlined in WIOA Regulation §463.31 and appropriately lead to:

- attainment of a secondary school diploma or its recognized equivalent; and
- transition to postsecondary education and training; or
- employment.

ELA activities include proven or evidence-based instructional techniques and learning strategies that support oral skills development for English language learners. AEL grant recipients will meet the requirements §463.31 through a variety of strategies including, but not limited to:

- Offering educational and career counseling services through Career Pathways Navigator services offered under contract by each grant recipient that enable

English language learners to transition to post-secondary education and training or employment;
- Alignment of curricula to the state content standards under development and aligned to the reading, writing, speaking, and comprehension needs of English language learners;
- Enrollment in Career Pathways programs including IET.

Integrated English Literacy and Civics Education activities, as defined in WIOA, as aligned education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries, that enable such adults to achieve 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.

As outlined in AEL Letter 04-16, Change 1, which promulgated revised policy guidance on this issue, AEL grantees must use funds allocated under WIOA §243 to provide EL Civics services in combination with IET. Integrated EL Civics funds must be used to support the IET service approach outlined in AEL Letter 02-16, including Workforce Training and Workforce Preparation Activities. Integrated EL Civics must:

• include instruction in literacy and English as a second language (ESL);

• include instruction on the rights and responsibilities of citizenship and civic participation;

• be provided in combination with IET, including AEL activities, Workforce Preparation Activities, and Workforce Training outlined in AEL Letter 02-16;

• be designed to prepare adult ELLs for and place them in unsubsidized employment in high-demand industries and occupations that lead to economic self-sufficiency; and

• be integrated with Local Workforce Development Board and Workforce Solutions Office functions to carry out the activities of the program.

Integrated Education and Training (IET) as defined in WIOA, which 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. AEL grant recipients have been implementing and expanding IET programs as an option under required Career Pathways components of since 2014 and these services will continue. Projects are being implemented with the required elements of contextualized and concurrent AEL, workforce preparation activities and workforce training.

Workforce Preparation Activities as defined in WIOA are activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education or training, or employment.

AEL grant recipients currently contracted are implementing Workforce Preparation Activities as part of contracted Section 243 Integrated EL Civics Education Services and through IET.

Family Literacy Activities, as defined in WIOA, are activities that are of sufficient intensity and quality, to make sustainable improvements in the economic prospects for a family and that better enable parents or family members to support their children's learning needs, and that integrate all of the following activities:

- 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.
- An age-appropriate education to prepare children for success in school and life experiences.

Family literacy activities are required under Texas law and are integrated into AEL contracts statewide.

Grantees also are required to implement one of the following services, to which TWC refers as "Intensive Models":

Workplace Adult Education and Literacy (Workplace AEL) as defined in WIOA are adult education and literacy activities offered by an eligible provider in collaboration with an employer or employee organization at a workplace or an off-site location that is designed to improve the productivity of the workforce.

Services for Internationally Trained English Language Learner Professionals provide services including, but not limited to:

- basic skills preparation for professional credentialing exams;
- specialized career advising;
- ESL services contextualized for targeted occupations; and/or
- professional opportunities.

ESL services contextualized for targeted populations provide enough intensity to allow for rapid progress and use the appropriate English language assessment to determine whether a participant's academic or professional English skills are sufficient for academic coursework.

Transition to Reentry and Post-release Services as defined in WIOA are educational programs for transition to reentry initiatives and other post-release services with the goal of reducing recidivism. Grantees may provide services under this category that include educational counseling or casework to support incarcerated individuals' transition to reentry and other post-release services.

The agency is committed to making long-term investments that enhance the capacity of providers to implement research-based models, including programs that support

accelerated options, including integrated education and training, Workplace AEL, distance learning, and service services models that support the career advancement of English language learners, including Integrated EL Civics Education. These services are required of all AEL grant recipients statewide and promote the employment and postsecondary education and training advancement of students. To these ends, TWC promotes innovative career pathway programs and opportunities for students to gain incremental marketable skills and reach their goals. The use of innovative strategies, often leveraging interagency collaborations, allows programs to generate positive employment and workforce training outcomes, while simultaneously serving more students at a range of functional levels.

TWC encourages activities that uphold the following priorities, including priorities that leverage the workforce development opportunities and efficiencies offered through concurrent enrollment:

- Expand integration with Boards and Workforce Solutions Offices (i.e., one-stop centers) including concurrent enrollment in workforce system program under WIOA, TANF, the state childcare program, Trade Act, vocational rehabilitation and other Workforce Solutions services;
- Establish or expand partnerships with community colleges and other training organizations that create greater opportunities for adult learners to transition to postsecondary education and workforce training programs, , including concurrent enrollment in IET services; and
- Develop innovative strategies to meet the needs of adult learners based on local resources, including strategies that:
    - enhance and support, and use educational delivery mechanisms that facilitate the immediate delivery of services to students; or
    - facilitate the progress of students from standard AEL programs toward a service-delivery activity that results in employment, a training certificate or certification, or college degree.

SPECIAL RULE

Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II, subtitle C, any of the following academic programs for:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

TWC's AEL grant recipients use funds, as allowable, to provide educational programs for criminal offenders in correctional institutions and other institutionalized individuals. Academic programs include the following:

- Basic education;
- Special education programs as determined by the Texas Education Agency;
- English literacy programs;
- Secondary school credit programs;
- integrated education and training;
- concurrent enrollment;
- peer tutoring; and
- transition to reentry initiatives and other post-release services with the goal of reducing recidivism.

Corrections is an optional activity for grantees, and the solicitation of §225 funds is combined with the overall grant application, with grantees proposing corrections activities and associated funding. As part of the grant competition, TWC ensured that in areas of the state where corrections has previously been provided or is needed and/or necessary based on the presence of correctional facilities, contracts are negotiated to include this activity.

To further support the expansion of allowable corrections activities allowable under WIOA, TWC included transition to reentry initiatives and other post-release services with the goal of reducing recidivism as an optional intensive model for grantees. Intensive models are funded at a higher cost per student to support model development and expansion.

TWC also is working to implement IET in correctional facilities (where IET is allowed) to support the successful transition of incarcerated individuals out of corrections and into employment.

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.

After implementing six Integrated EL Civics pilot projects in 2015, TWC required the implementation of Integrated EL Civics education into all its 2014-2018 grants making this as of July 1, 2016. This requirement was continued in the most recent competition, with all grantees receiving funds and associated targets for Integrated EL Civics Education.

Grant recipients deliver Integrated EL Civics education through a program of study delivered concurrently and contextually that includes:

- **ELA** instruction;
- **Civics** education instruction emphasizes the rights and responsibilities of citizenship, naturalization procedures, civic participation, and U.S. history and government to help students acquire the skills and knowledge to become active and informed parents, workers, and community members; and
- **Integrated Education and Training (IET)** in specific occupations or occupational clusters, which provides workforce training opportunities for eligible participants.

TWC's policy guidance letter on Integrated EL Civics education, AEL Letter 04-16, Change 1, outlines the revised programmatic and funding requirements of the program under WIOA. TWC requires all Grant Recipients to submit their Integrated EL Civics education models through an online Implementation Plan portal that allows the agency to check for programmatic design and compliance and provide related technical assistance.

Additionally, TWC requires that grantees provide all participants with a syllabus that, in addition to general information about the course, attendance requirements, and course objectives, includes (for all IET programs, including Integrated EL Civics):

- a description of each of the three core components of an IET program of study, including:
    - AEL activities;
    - Workforce Preparation Activities; and
    - Workforce Training;
- a single set of learning objectives that identifies specific adult education content, Workforce Preparation Activities, and Workforce Training competencies;
- the schedule for the IET program of study, showing how the core components are provided concurrently within the scope of the program; and

information about the recognized postsecondary credential for which participants will prepare, including how the credential is earned and which organization administers the credential.

TWC has supported this model through professional development and support efforts funded under Section 223 and will continue to do so.

2. DESCRIBE HOW THE STATE WILL FUND, IN ACCORDANCE WITH THE REQUIREMENTS OF TITLE II, SUBTITLE C, AN INTEGRATED ENGLISH LITERACY

AND CIVICS EDUCATION PROGRAM AND HOW THE FUNDS WILL BE USED FOR THE PROGRAM.

Integrated EL Civics education was in incorporated in the statewide competition for AEFLA funds and followed the requirements of Subpart C in Title II of WIOA related to competition, direct and equitable access, same grant process, and use of the 13 considerations described in Section 231(e) of AEFLA Section 243 funds and related service delivery requirements are included in all statewide contracts. The agency has implemented a revised funding structure to support the IET requirements of the IEL/CE program. As a result, Integrated EL Civics education was fully implemented on July 1, 2016, and was in the statewide competition in 2017 as a required activity. Additionally, TWC supports the development and implementation of Integrated EL Civics education models through activities currently authorized under AEL multiyear provider contracts.

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.

Since the 2013 transition of the AEL program to TWC, the Commission has deliberately used State Leadership funds to support activities that strategically position the statewide system not only for continuous improvement across program outcomes but for innovation in new directions related to full system integration with core programs and postsecondary education and training.

TWC will continue to use not more than 12.5 percent of the grant funds made available under section 222(a)(2) to carry out State Leadership activities that enhance the quality and compliance of the AEL system and to support the development of innovative models of service delivery.

Required projects under §223 for which the Commission has designated State Leadership funds, including anticipated projects that will be continued or designated for development and implementation, include the following:

- The Stakeholder Integration Institute through the Statewide Professional Development Center,supports the **alignment of AEL activities with other core programs in the workforce system, as required under §223(a)(1)(A).** The institute provides statewide professional development that emphasizes system integration and partner collaboration to affect customer outcomes, whether the practitioner is an AEL teacher, a Workforce Solutions Office intake and assessment worker, or a Workforce Solutions vocational rehabilitation counselor.
- Both the Career Pathways Expansion and the Accelerate Texas initiatives support the continued development of content and models that support career pathways as required under section 223(a)(1)(A). Career Pathways Expansion supports professional development and other assistance, including developing mentoring-related models that pair expert providers with providers that are emerging in their development of fully integrated career pathways. Accelerate Texas supports expansion of IET models and other postsecondary transition models, including workplace and apprenticeship projects with employers. Both these initiatives increase the capacity to expand, develop, and implement IET models that focus on

career pathways service approaches that include workforce training, development and integration efforts with Workforce Solutions, Texas community colleges, employers, and other system stakeholders.

- Texas currently has a statewide professional development center as required under section 223(a)(1)(B). It supports high-qualitystatewide professional development to AEL providers and other system stakeholders. Allocations of State Leadership funds will continue to be made to providers to support local customized professional development. Additionally, funds are dedicated for supporting volunteer-based providers and for developing administrative and instructional leadership among AEL practitioners through the Leadership Excellence Academy, which will be developed in 2018. Finally, Focus on the Basics and the Career Pathways Expansion projects support the dissemination of instructional and programmatic practices as required in §223(a)(1)(B) in the areas of reading, math, and ESL.

While TWC staff continues to use strategic evaluation and monitoring processes that allow staff to provide just-in-time technical assistance, several State Leadership projects are planned to augment the state technical assistance efforts as required under §223(a)(1)(C).

The statewide professional development center and Focus on the Basics projects, described above, support:

- the development and dissemination of instructional programmatic practices and related technical assistance as required under §223(a)(1)(C)(i) and based on the most rigorous or scientifically valid research available and appropriate to support eligible providers in implementing reading, writing, mathematics, career pathways, ELA, and distance learning;
- the Stakeholder Integration Institute at the stateside professional development center , Career Pathways Expansion, and Accelerate Texas projects, described above, which support the role of eligible providers as a one-stop partner as required under §223(a)(1)(C)(ii); and
- distance learning and technology development, deployment, and support as required under §223(a)(1)(C)(iii), which continues and is planned through the Distance Learning Mentor Initiative and Distance Learning and Technology Integration Institute at the statewide professional development center to enhance the development and implementation of technology applications, including increased distance learning and the expansion of a statewide learning management system to provide online professional development for staff training.

Activities to support the monitoring and evaluation of the quality and improvement of services and innovation expansion as required under section 223(a)(1)(D). Evaluation of local provider services is a key priority for the AEL program. TWC staff has worked to develop a strategic evaluation and monitoring process that draws from best practices developed across TWC's divisions. Texas is implementing a program quality model to support student success that links deployment of WIOA program enhancements, evaluation of monthly program performance and information and findings from the agency's monitoring department to just-in-time technical assistance and the deployment of targeted professional development to support continuous program improvement. Section 233 funds

support activities within this quality improvement model and include the dissemination of information about models and proven or promising practices within the State through section 233 funded mentoring and professional development projects.

Wide-Scale Evaluation of the Quality of Adult Education Services

In addition to regular programmatic monitoring and evaluation, TWC AEL staff is working with the TWC Division of Operational Insight on a large-scale evaluation process that will analyze the effectiveness of professional development activities as they relate to programmatic outcomes. This evaluation will inform the continued implementation of a high-quality professional development system, including effective trainings, trainers, and events that lead to optimal programmatic outcomes.

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

Additionally, the Commission may designate other activities of statewide significance that promote the purpose of WIOA for PY'18-19, including, but not limited to, the following:

- Assistance to local providers in developing and implementing programs that achieve WIOA's objectives, and in measuring the progress of those programs in achieving the objectives, including meeting state performance;
- Promotion of workplace AEL activities;
- Continued development and dissemination of curriculum frameworks;
- Further alignment of content standards and assessments in reading and language arts, mathematics, and English-language acquisition with other state standards, including high school equivalency, college and career readiness, enrollment in nonremedial, for-credit courses at postsecondary educational institutions, and occupational and industry skill standards and certification;
- Outreach, develop, and pilot strategies for improving teacher quality and retention; and
- Development and implementation of programs and services to meet the needs of adults with learning disabilities or limited English-language proficiency.

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.

Ongoing Program Monitoring and Oversight

Evaluation of local provider services is a key priority for the AEL program. TWC staff has worked to develop a strategic evaluation and monitoring process that draws from best practices developed across TWC's divisions. Texas is implementing of a program quality model to support student success that links evaluation of monthly program performance and information and findings from the agency's monitoring department to just-in-time technical assistance and the deployment of targeted professional development to support continuous program improvement.

The AEL Department provides a Monthly Performance Report (MPR) to the director of the Workforce Development division. The MPR meeting is facilitated by AEL program and contract management staff, led by the AEL Director and Coordinator for Strategic Planning and Performance Accountability and includes a monthly snapshot of both program and financial performance across all AEFLA programs, including section 233 projects.

The MPR is the result of a multiphased process that uses timely data gathered from the Texas Educating Adults Management System (TEAMS) to measure program performance against contract deliverables as well as state and federal performance targets. TEAMS is Texas' state-of-the-art, web-enabled system that maintains student-level data, including demographic, assessment, and outcome data, as well as class, site, program, and provider information. TEAMS users can analyze class, site, or program information through use of standard reports generated at the user level. TEAMS provides a wide range of information about adult education, including snapshots of student and program performance, personnel qualifications, and staff development activities.

AEL programs are required to validate their data monthly and submit quarterly Data Sign-off Reports through TEAMS. The Data Sign-off Report requires programs to describe areas of strength as well as concern. Programs also are required to submit monthly expenditure reports in TWC's Cash Draw and Expenditure Reporting (CDER) system and quarterly narrative reports using a predetermined template that requests information on specific TWC objectives and overall program objectives.

AEL contract deliverables reflect TWC's commitment to strong performance and accountability. These deliverables include a combination of program and financial accountability and encourage programs to exhibit strong planning through the development of project plans, continuous improvement plans, and standard operating procedures.

To prepare for the MPR report, AEL program staff meet, weekly, at a minimum, to evaluate the overall health of each program, which is measured against contract deliverables; progress toward measures; state performance measures; and expenditures. Program staff discuss trends in data and issues of particular concern, and develops support plans to address those issues. Because services are aligned to workforce areas, staff can see where specific issues are isolated throughout the state. This provides a structure under which staff can engage TWC's Statewide Professional Development Center and other Section 223 funded professional development and technical assistance support projects to address concerns.

If a program does not show improvement after being placed on a support plan, TWC places it on a Technical Assistance Plan (TAP). TAPs use a timeline of deliverables to improve and support program function. TAP actions may include additional targeted professional development support, one-on-one training in specific areas of weakness or concern, and technical assistance visits by TWC staff to meet and address particular issues. Members must meet specific benchmarks for a period of four consecutive months in order to have a TAP lifted. Programs that consistently fail to meet contract deliverables once placed on a TAP are placed on a Corrective Action Plan. Programs that fail to meet objectives beyond this point are subject to sanctions and deobligation of program funds.

Responsive professional development efforts funded under section 223(a)(1)(B) of WIOA is a central component of the quality model. TWC AEL assesses the quality and responsiveness

of professional development through multiple approaches, including the review of local program improvement and remediation of deficiencies that should result after professional development and technical assistance efforts.

For example, through the quality model, a provider that month to month shows poor performance in reading or oral language scores will be advised by their TWC AEL Program Support Specialist or assigned Professional Development Specialist to schedule professional development in these areas. Once the program receives professional development services, the AEL department monitors program improvement to report in the MPR. Professional development is only one remedy to addressing program improvement, and is deployed with other forms of technical assistance.

While changes in local program improvement is perhaps the most direct means of assessing the quality and effectiveness of professional development, it is not the only method of quality review in place. Professional development trainers are required to meet established quality and professional criteria developed and assessed by the state PD Center and AEL staff; training is reviewed by AEL staff to assure alignment with agency objectives and best practices based on the most rigorous or scientifically valid research available Specific professional development efforts funded under section 233 focus on developing curricula and training, including training-of-trainer models on ensuring support for instruction in the essential components of reading instruction and instruction related to the specific needs of adult learners. The Literacy Institute at the state PD Center and the Focus on the Basics project are focused on professional development in the essential components of reading instruction and instruction related to the specific needs of adult learners. TWC AEL review and both training curricula deliverables and training for these projects against best practices based on the most rigorous or scientifically valid research available. A Section 233 funded project, Literacy Texas, focuses specifically on training volunteers in the content areas, including reading. These projects all have deliverables supporting the dissemination of information about relevant models and promising practices

Additionally, all professional development events include session evaluations and these evaluations are provided to the AEL office which reviews these monthly.

Subrecipient Monitoring

TWC's Subrecipient Monitoring (SRM) department conducted on-site reviews of 74 percent (25 programs) of AEL grant recipients over the first three years of service under new contracts, with the balance of programs being reviewed on-site in the last year of contracts. Programs not reviewed on-site in a particular year received a desk fiscal review. Risk is determined based on an analysis of factors, including size of grant award amount, timeliness of data entry, "newness" of the program or key program staff, and expenditure amounts.

In the second year of new contracts, SRM will conduct on-site reviews of the programs deemed high risk and not reviewed in year one.

While on-site, SRM reviews expenditures and records management (including eligibility documentation) and conducts staff interviews to confirm that internal processes for participant intake, screening, and placement comply with TWC's AEL policy. SRM identifies records in TEAMS to compare with on-site records, including student test scores, student attendance records, and staff professional development hours.

SRM hosts a preplanning meeting with TWC AEL staff to discuss any potential issues prior to the on-site visit. This gives SRM the opportunity to ask questions about specific items of interest uncovered in the risk assessment. It also provides SRM with any technical assistance items that have been discussed and reviewed with the grant recipient by AEL staff, including performance. The process ensures that SRM gains an accurate review of program activity and any ongoing issues.

SRM also conducts a preplanning conference call to help grant recipients prepare and assemble necessary documentation preceding each on-site review. During the visit, program staff is interviewed about program processes. At the conclusion of the interview, SRM conducts an exit interview, in which staff reviews any findings, which are later distributed in an official report. Grant recipients have the opportunity to dispute any findings.

Deobligation of Funds

TWC is keenly focused on performance to ensure that funds are used effectively to serve customers and produce positive results. Contracted performance benchmarks and performance standards highlight TWC's expectation that grantees will maintain or exceed performance standards through effective service delivery and innovation. TWC rule §800.78 allows funds to be deobligated, including voluntarily, if they are not being used effectively and at expected levels to serve individuals needing AEL services; however, TWC staff works diligently with grantees to provide technical support and assistance in developing strategies to ensure that funds are used to serve customers efficiently and effectively, thereby mitigating risks.

Under current budgetary conditions—as in the past—the need for AEL services exceeds Texas' available resources, and no workforce area is funded to fully meet its needs. TWC expects that AEL grant recipients will identify, and coordinate with, all available organizations and programs in their workforce areas to expand and leverage deliverable services beyond those provided solely through AEL funding.

Self-Evaluation and Monitoring of Local Programs

As part of their deliverables, all TWC grant recipients (sole providers and lead grant recipients for consortia of providers) are required to:

- submit a plan outlining their process for monitoring performance and expenditures;
- use TEAMS to regularly monitor program performance across all providers; and
- develop a yearly continuous improvement plan (CIP).

Programs use the CIP as an opportunity to analyze their performance, determine the cause of areas of weakness, and develop strategies for improvement in the coming year. Programs are required to tie their professional development activities to this plan to ensure adequate training and support for program improvements.

TWC AEL staff also holds regular conference calls and biyearly meetings for program members to share challenges as well as best practices. These forums build on what is working in the field and provide peer-mentoring opportunities.

Additionally, programs are required to regularly solicit student evaluations to assess satisfaction with curricula, instructors, and institutions.

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 **Texas Workforce Commmission**

Full Name of Authorized Representative: **Larry E. Temple**

Title of Authorized Representative: **Executive Director**

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

ASSURANCES

The State Plan must include assurances that:

1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding supplement and not supplant provisions). Yes

2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA. Yes

3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA. Yes

4. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities; Yes

5. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations

that lead to economic self-sufficiency and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and Yes

6. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program. Yes

7. The eligible agency agrees that in expending funds made available under title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303). Yes

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the instructions posted at https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc.

TWC ensures equal opportunities for all eligible students, teachers, and other program beneficiaries to participate in any project or activity carried out under the applicable program, including AEL, and promotes the ability of such students, teachers, and beneficiaries to meet high standards.

TWC also ensures equitable access to and participation in all projects and activities conducted with federal adult education funds. All AEL contractors, including those funded under AEFLA §223 and §231, are required to comply with the nondiscrimination provisions of 34 CFR §76.500 and 45 CFR §260.35, which bar discrimination on the basis of race, color, national origin, sex, disability, and age under Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act.

Programs must address the special challenges that students, teachers, and other program beneficiaries face in overcoming barriers to participation and are required to describe how individuals will benefit from equitable access to services, including access in the areas of facilities, assessment, orientation, and overall service delivery.

TWC ensures that local providers give equal access to, and afford equitable participation in, all such projects and activities through the monitoring and technical assistance process, and that they follow the applicable laws.

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION

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

_____

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

A. INPUT OF STATE REHABILITATION COUNCIL

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

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

Recommendation: The Rehabilitation Council of Texas (RCT) recommends that Vocational Rehabilitation Services (VR) continue to encourage VR counselors to have or obtain a master's degree. Response: VR is committed to having highly-qualified counselors serve customers with disabilities. As part of the Qualified Vocational Rehabilitation Counselor (QVRC) program, VR counselors are currently required to meet the Comprehensive System of Personnel Development (CSPD) standard within seven years of completing the initial training period, which means that a counselor will have completed a Master of Rehabilitation Counseling or a degree in a closely related field.

Recommendation: RCT recommends that VR include the turnover rate of its staff by job title in the Comprehensive System of Personnel Development and Data System section. Response: VR believes that data regarding turnover rate are captured in data for attrition rate, which is found in Table 2, Vocational Rehabilitation Division Attrition Rate, within the Comprehensive System of Personnel Development and Data System section. Turnover, as defined and calculated on page 30 of this section, does not include vacancies created by employee promotions, reclassifications, demotions, or transfers within the agency. Attrition rates would appear to be like turnover rates, based on the categories listed under attrition (voluntary, involuntary, retirements, and other transfers), as they do not include promotions, reclassifications, demotions, or transfers within the agency. For future state plans, VR will add data on the attrition rate for additional job title positions that include providing direct services to customers or supervising direct service delivery staff.

Recommendation: To ensure ethnic diversity among staff, RCT recommends that VR consider facilitating a comparison between the ethnic distribution of its employees to the ethnic diversity of customers served. Response: TWC VR will incorporate comparison data into the next Combined State Plan (CSP).

Recommendation: If an Order of Selection is needed, RCT recommends that VR organize an implementation team to develop a plan to ensure a smooth transition. Response: VR's annual estimates do not forecast an imminent need for an Order of Selection; however, VR is committed to planning for future contingencies. If data predict a possible need for an Order of Selection in future years, VR will engage a cross-agency team to ensure smooth implementation and will prepare the required section of the CSP in consultation with RCT.

Recommendation: RCT recommends that VR provide detailed training to VR counselors regarding the use of additional resources to assist customers, such as Medicaid waiver programs. Response: As part of a five-day intensive training, VR state office program specialists for benefits and work incentives provide training on Medicaid waivers to staff members who function as subject matter resources on Social Security Administration (SSA) benefits. Additionally, a two-part webinar series on waivers is held each year for relevant staff. To date, 121 VR counselors have been trained as subject matter resources for benefits and work incentives, and an additional 58 staff members in management, as well as state office program specialists, have completed the training.

Recommendation: RCT acknowledges and commends VR for expanding the capacity of staff in assistive technology by training regional teams to become subject matter experts. Although it is possible that the Centers for Independent Living (CILs) around the state serve as resources to local VR staff, it is vital that VR staff have access to accurate and up-to-date information about assistive technology to overcome workplace barriers specific to disabilities. RCT recommends that VR clarify content in the Strategies and Use of Title I Funds for Innovation and Expansion Activities section to clarify which customers will be served by these teams. Response: The regional teams are composed of VR staff members who have been trained in all levels of assistive technology and who provide recommendations on assistive technology to customers with various disabilities. The loaning or purchasing of assistive technology is not limited to customers with specific disabilities; it is available to all customers as needed.

Recommendation: RCT recommends that VR expand the content in the Comprehensive Statewide Needs Assessment (CSNA) overview about developing a provider base to include how this will be accomplished. Response: CSNA results indicated that there is likely a need to expand the provider base, especially for blind services and independent living services that support vocational goals. The CSNA also identified service needs for further study and strategy development. Studying these service needs will include reviewing the sufficiency and performance of the provider base that meets those service needs, most importantly, employment services providers. VR has initiated that research process in collaboration with RCT, and it includes reviewing additional provider data by service type and region.

Recommendation: RCT recommends that VR clarify content in the CSP related to the time that rehabilitation assistants (RAs) with undergraduate degrees will be given to obtain a master's degree. Response: While some RAs may have undergraduate degrees, there is not a requirement that RAs have a master's degree; therefore, there is no deadline for RAs to obtain a master's degree.

Recommendation: RCT recommends that VR ensure that the individual plan for employment (IPE) is completed as early as possible during the transition planning process and no later than the time the student with a disability who is determined to be eligible for VR services leaves the school setting. Response: Policy in VRSM C-1300 states that the VR counselor must complete the IPE before the eligible student leaves the school setting and no more than 90 days from the time of eligibility determination. VR is committed to ensuring that VR counselors comply with this policy, with an emphasis on monitoring through case reviews and readings.

Recommendation: RCT recommends that VR clarify what types of contractors are required to have a director with University of North Texas (UNT) credentials. Response: All

contracted service providers, except those providing post-acute brain injury services, are required to have a director with UNT credentials. Per the Standards for Providers manual Chapter 3, service contracts are used when a provider completes the following tasks or services: • Assessing assistive technology designed for the blind and visually impaired • Providing diabetes education • Providing employment-related services • Assessing a customer's work environment • Providing Individual Living Services for Older Individuals Who Are Blind • Providing Orientation and Mobility services • Providing Post-Acute Brain Injury services • Providing Pre-Employment Transition services • Providing Project Search services • Providing Supportive Residential Services for Persons in Recovery • Developing wellness recovery action plans

Recommendation: RCT recommends that VR indicate where and how the use of Social Security benefits can be used to pay for extended services after VR involvement. Response: Both VR and employment networks (ENs) participate in the Ticket to Work Partnership Plus Program for individuals between the ages of 18 and 64. When a VR case is closed successfully, the customer is informed that his or her Ticket to Work still has value and can be assigned to an EN to provide long-term job supports and services. Customers are informed of the ENs serving Texas. Additionally, subject matter resources on SSA disability benefits provide guidance to customers on using SSA work incentives, which can potentially assist with maintaining health insurance benefits and cash benefits after achieving employment. SSA benefits and the partnership between VR and ENs are fully explained on page 24, in the Social Security Administration section, and on page 58, in the Funding and Timing of Transition to Extended Services sections.

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

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

n/a

B. REQUEST FOR WAIVER OF STATEWIDENESS

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

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

n/a

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

n/a

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.

n/a

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;

To ensure that individuals with disabilities receive appropriate services, VRD has the following cooperative arrangements with various federal, state, and local agencies and programs to use their services and facilities: • An MOU with the Texas Health and Human Services Commission (HHSC) to provide VR services to individuals eligible for home and community-based services under a Medicaid waiver or Medicaid State Plan Amendment. HHSC is the state agency that provides services to individuals with developmental disabilities. VRD also works collaboratively with the Texas Department of State Health Services to provide cooperative VR services to individuals receiving mental health services. • MOUs with education service centers, TEA, and independent school districts (ISDs) to enhance coordination of services provided through programs like Project SEARCH and Project HIRE (Helping Individuals Reach Employment), and other community programs and support available to improve and expand services for transition-age students with disabilities • Coordination with the Texas School for the Blind and Visually Impaired to provide specialized programs that prepare students for the transition to postsecondary life and the workplace • A new MOU in 2016 with the Texas Department of Insurance's Division of Workers' Compensation to enhance referrals for return-to-work efforts • Coordination with the Social Security Administration (SSA) on employment incentives and support to maximize Social Security Administration/Vocational Rehabilitation (SSA/VR) reimbursement activity through the Ticket to Work Program • An MOU with the U.S. Department of Veterans Affairs to maximize case service funds through better access to comparable benefits, and to enhance the case management process while avoiding duplication of services. • Coordination with the Texas Veterans Commission to help identify veterans who need additional support in securing benefits, gaining employment, and accessing advocacy services. • Coordination with the Texas Coordinating Council for Veteran Services to help identify trends that have an adverse effect on the veteran population, and create strategies to address and resolve those issues at the state level • Coordination with the U.S. Department of Labor Office of Federal Contract Compliance

Programs to create statewide symposiums and job fairs to meet the federal regulation that requires federal contractors to ensure that no less than 7 percent of their workforce includes individuals with disabilities • Coordination with the Texas Criminal Justice Coalition for juveniles and adults to assist and strengthen supports and employment goals by exploring career opportunities • Coordination with the Texas Department of Transportation on addressing the issue of inadequate transportation, often a major factor in a customer's ability to maintain employment Additionally, VRD uses TWC's internal structure to: • verify for Texas businesses that job applicants under the Work Opportunity Tax Credit program are receiving, or have received, VR services under an individualized plan for employment; • access electronic wage data to verify employment history and income for customers for the purpose of closure data and SSA/VR reimbursement submission; and • collaborate with Workforce Solutions Offices regarding customer training and support for employment goals, including participation in symposiums, job fairs, and providing disability awareness training.

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

VRD works with organizations across the state to ensure that it meets customers' assistive technology needs, including transition services for students and youth with disabilities and pre-employment transition services for students with disabilities. The organizations include contracted assistive technology evaluation sites across the state and VRD's own Assistive Technology Unit. Contract providers are required to participate in a thorough testing program to ensure that they meet minimal standards of proficiency to become approved assistive technology providers. VRD uses programs such as the Computer/Electronics Accommodations Program when a customer is interested in employment with the federal government, the Specialized Telecommunications Assistance Program (STAP) for obtaining telecommunication devices, and various assistive technology programs for the deaf and hard of hearing. Each Texas Workforce Solutions Vocational Rehabilitation Services (TWS-VRS) region received an assistive technology kit containing some of the more popular assistive technology items. Each TWS-VRS region has a staff member who maintains the kit and provides training on the use of the technology to field staff. The items in the kit include technology used to increase productivity at work, expand educational/vocational options that increase customers' opportunities for success, and improve quality of life. While these kits were specifically purchased for legacy Division for Rehabilitative Services (DRS) regions, with the combination of the two designated state units (DSUs), assistive technology staff will be co-located and share knowledge and resources so that updated technology purchases can address the needs of customers with various disabilities, including blindness and visual impairments. VRD will be entering into an MOU with the Texas Technology Access Program (TTAP), the implementing entity designated by the governor under the Assistive Technology Act of 1998 (29 U.S.C. 3003) §4 to coordinate activities, including the referral of individuals with disabilities. Currently, VRD refers customers to TTAP demonstration centers located throughout the state to ensure that they have an informed choice of assistive technology and that equipment purchased by VRD meets each customers' needs.. VRD participates in annual joint presentations with TTAP at Ability Expo in Houston and the Texas Workforce Commission (TWC) statewide conference, which provide opportunities for customers and counselors to learn about new adaptive equipment and assistive technology that can assist in maintaining competitive, integrated employment.

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

VRD coordinates with Texas A&M AgriLife Extension Service and Texas AgrAbility to assist customers with modifications of agricultural equipment and tools, allowing for agricultural producers with disabilities to continue with farming and ranching.

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

VRD works with the following: • Community Resource Coordination Groups (CRCGs), which are local interagency groups composed of public and private providers that come together to develop individualized service plans for children, youth, and adults whose needs can be met only through interagency coordination and cooperation • Other private and public for-profit and nonprofit entities, such as corporations, partnerships, and sole proprietorships, to provide a number of rehabilitation services purchased only from entities that have been approved as Community Rehabilitation Program (CRP) providers. Contracts with CRP providers reference the VRD Standards for Providers manual and specify the terms and conditions of the relationship, including approved services, expected outcomes, fees, staff qualifications, and required documentation

5. STATE USE CONTRACTING PROGRAMS.

VRD has a contract with Texas Industries for the Blind and Handicapped and the Texas State Use Program to provide services in support of agency and divisional operations.

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 provision of quality VR services for Texas students with disabilities is a strategic priority for the Vocational Rehabilitation Division (VRD). VRD policies and procedures have been updated to align with the Workforce Innovation and Opportunity Act (WIOA) §413(B)(F), which sets forth that the individualized plan for employment (IPE) must 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 counselor and the eligible individual agree to an extension to a specific date. Transition planning by VR counselors and school personnel facilitates the development and implementation of a student's individualized education program (IEP) under the Individuals with Disabilities Education Act §614(d). The goals developed in the IEP are considered in the development of the IPE. The development and approval of an IPE is initiated by a VR counselor. Planning includes conversations about informed choice and program information so that students understand the available options for additional education, training, service providers, and employment.

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;

VRD maintains collaborative working relationships with public education entities in Texas. VRD services emphasize and provide a coordinated set of age-appropriate activities that enable transition students, parents, education personnel, and others to actively plan for and assist the student to prepare for life after leaving high school, including proactively developing partnerships with communities, service providers, and businesses to create opportunities for students to obtain postsecondary education, training, and competitive integrated employment.

State Education Agency Partnership TWC VRD works closely with TEA to coordinate transition planning services for students between ages 14—22 who receive special education services in Texas. As required in 34 C.F.R. §361.22(b), TWC-VRD is collaborating with TEA to develop a new MOU that outlines the responsibilities of TWC's VRD for the provision of transition planning services as well as the fiscal responsibility of TEA for the provision of services as required by the Individuals with Disabilities Education Act. The MOU represents each agency's commitment to collaborate and cooperatively facilitate the successful transition of students with disabilities from high school to competitive integrated employment using VR services. The MOU will include the addition of pre-employment transition services (Pre-ETS) as defined in C.F.R. §361.48, and other Workforce Innovation and Opportunity Act (WIOA) requirements, operationalizing a referral process for students with disabilities, and a process for inviting counselors to Admission, Review, and Dismissal (ARD) meetings. The MOU provides for consultation and technical assistance in planning for the transition of students with disabilities from school to post-school activities, including VR services; transition planning for students with disabilities that facilitates the development and completion of the IEP; clarification of the agencies' respective roles and responsibilities, including financial responsibilities for providing transition planning services to students with disabilities; and a description of procedures for outreach to and identification of students with disabilities who are in need of transition 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;

VRD develops partnerships with schools and community organizations to help students with disabilities make a smooth transition to adulthood and work. VRD's counselors throughout the state who are assigned to high schools have a role in preparing students with disabilities for entry into the workplace. VR counselors coordinate closely with high schools to ensure that appropriate students are referred to the VR program. They serve as information resources for teachers and other educational staff, and provide resources and information about blindness and other disabilities to parents and transitioning students. They work closely with parents, education staff and community service providers to promote development of skills needed for students to become as independent as possible, as well as competitive in terms of integrated employment. Counselors work with schools to identify students receiving Supplemental Security Income (SSI) as early as possible in the

process to address concerns regarding impact of employment on benefits and to provide resources for benefits counseling. Pre-ETS are provided to students with disabilities. Required Pre-ETS activities are job exploration counseling, work-based learning experiences, counseling on opportunities for enrollment in postsecondary educational programs, workplace readiness training, and instruction in self-advocacy. In an effort to provide transitioning students with more effective and comprehensive preparation for work after high school, VRD is also increasing the number of summer work opportunities with community partners around the state. TWC is launching the Pathways to Careers Initiative (PCI), an initiative to expand Pre-ETS to Texas students with disabilities. The first strategy launched under PCI in summer 2017 was Summer Earn and Learn. VRD partnered with each of the 28 Local Workforce Development Boards (Boards) and their employer partners to provide employability skills training and work experience for students with disabilities. Summer Earn and Learn will continue in subsequent summers. Another strategy is Charting the Course: Planning for Life after High School. This strategy proposes to engage students with disabilities and their families in a series of education, awareness, and planning events beginning with the students' eighth grade year. Engaging families earlier in preparing their children for high school promotes better planning for student transition activities in high school, and supports a successful transition to further education and employment after high school. VRD counselors work with the high schools to provide consultation and technical assistance regarding the VR process and appropriate services that may be available to customers. Consultation and technical assistance is provided at ARDs, and attendance may be in person or through alternative means, including videoconferencing or conference calls (based on 34 C.F.R. §361.22(b)(1)). When necessary, VRD counselors and school personnel coordinate to satisfy documentation requirements for students and youth with disabilities who are seeking subminimum wage employment, as set forth in 34 CFR §397.4(c). VRD does not pursue subminimum wage employment for customers. When a customer chooses to pursue subminimum wage employment, counseling on other employment options is provided. When, after counseling, subminimum wage employment is still the customer's choice, the VR case is closed. Those customers who choose subminimum wage employment receive counseling, guidance, and referral services within the first six months of employment and annually thereafter. TWC has regional and state office transition specialists who provide support to VR counselors and VRD field office managers in developing collaborative partnerships with and increasing cooperation between VRD, local school districts, and other community organizations as resources for students with disabilities. These transition specialists assist with the development of policy, training, and strategies that lead to effective provision of transition services.

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

TEA and education service centers develop MOUs with ISDs to enhance coordination of joint service provisions, continuing to develop services provided through such programs as Project SEARCH and Project HIRE and other community programs, and to improve and expand services for transition-age students. VRD works in conjunction with TEA's Special Education Division, Texas School for the Deaf, Texas School for the Blind and Visually Impaired, education service centers, ISDs, and high schools to provide Pre-ETS along with a

wide variety of other VR services that support the success of a student with a disability. These services help strengthen the connections between the school, students, parents, and community to promote a smooth transition to postsecondary education, training, the workforce, and independent living. Local education agencies maintain fiscal responsibility for transition services that are also considered special education or related services, and that are necessary for ensuring a free, appropriate public education to children with disabilities within Texas, including those outlined in the IEP (34 C.F.R. §361.22(c)). Additionally, House Bill 617, 83rd Texas Legislature, Regular Session (2013), requires that each ISD have an individual identified as the Transition and Employment Designee (TED). The TED is responsible for providing information and resources about effective transition planning and services. VRD has counselors throughout the state assigned to high schools to assist students with disabilities in preparing for entry into the workplace. Nothing related to VRD's responsibilities and requirements under WIOA should be construed as a reduction in local education agencies' responsibility under IDEA to provide and pay for special education and related services as a part of a free and appropriate education to students with disabilities (WIOA §101(c)). VR counselors (VRCs) coordinate closely with high schools to ensure appropriate students are referred to the VR program. Transition program specialists support the work of VRCs and VRD field office managers in developing collaborative partnerships with and increasing cooperation between VRD, local school districts, and other community organizations as resources for students with disabilities. VRD has transition VRCs and VRCs who act as liaisons for high schools and partner with the educational system to more appropriately serve transition-age students seeking assistance to access adult vocational services. VRD partnered with other health and human services agencies to assist TEA in developing the Texas Transition and Employment Guide for students enrolled in special education programs and their parents. The guide provides information on statewide services and programs that help facilitate the transition to life outside of the public-school system.

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

TWC's current MOU with TEA includes the addition of Pre-ETS, as defined in 34 C.F.R. §361.48, and other WIOA requirements, operationalizing a consistent referral process for students with disabilities, and a process for inviting counselors to attend ARD meetings. Counselors work with schools to identify students receiving SSI as early as possible, to address concerns regarding the impact of employment on benefits, and to provide resources for benefits counseling. TWC's VRD has specialty transition VRCs and VRCs who act as liaisons for high schools and partner with the educational system to more appropriately serve transition-age students seeking assistance to access adult VR services. Partnering with ISDs allows counselors to use office space on campus and be available to students and school staff to discuss VR services, resources available through the Texas workforce system, community, businesses, and other partners necessary to build a network of support. Additionally, it allows counselors to provide relevant seminars, workshops, camps, and summer work experiences throughout the state.

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.

AVAILABILITY OF INFORMATION ON SERVICE PROVIDERS

To assist customers in making informed choices regarding VR providers, TWC's VRD maintains ReHabWorks, an electronic case management system. ReHabWorks contains information specific to each Community Rehabilitation Provider (CRP). Workforce Solutions staff shares information about qualified providers for a service, as it relates to a CRP's experience in working with target populations, foreign languages, and other communication skills such as American Sign Language, ensuring that a customer has the opportunity to make an informed choice when selecting a service provider.

PROVIDER CONTRACTING PROCESS

VRD establishes contractual relationships with providers of VR services, including private nonprofit providers. To expand opportunities and increase efficiency related to recruiting providers, VRD posts notification of contracting opportunities on the Electronic State Business Daily (ESBD), where organizations can complete an application to become a service provider if the organization meets the requirements listed in the ESBD posting.

SERVICE PROVIDER CONTRACTS

The VR Standards for Providers (Standards) are published on the TWC website and specify the scope of work for providing contracted goods and services. Contracted providers are required to follow the VR Standards, which specify the terms and conditions of the contractual relationship, approved services, expected outcomes, fees, staff qualifications, and required documentation. Revisions to the Standards are made periodically, and notices of upcoming changes are published on the TWC website at least 30 days in advance of the effective date of the changes. Providers are contractually responsible for complying with the most recent standards and their individual contract. Services include:

- orientation and mobility;
- assistive technology training;
- diabetes education;
- independent living services for older individuals who are blind;
- job placement;
- job skills training;
- personal social adjustment training;
- post-acute brain injury services;
- Project SEARCH;
- supervised residential services for individuals in recovery;
- self-employment;
- supported employment services;
- vehicle modification;
- vocational adjustment training;
- vocational evaluation and assessment;

- wellness recovery action plans (WRAP);
- work adjustment training; and
- work experience.

OVERSIGHT AND MONITORING OF CONTRACTED SERVICE PROVIDERS

TWC purchases services only from providers that are in compliance with the VR Standards. TWC-contracted service providers are subject to both ongoing and periodic programmatic and financial monitoring. Risk assessment tools are used at the state and the regional level to identify service providers to be monitored. On-site monitoring visits may be scheduled. Additionally, service providers not identified through the risk assessment tools may also be monitored. A monitoring team includes representatives from TWC VRD and VR Contract Oversight Monitoring. Contractors found in noncompliance with VR Standards may be placed on a corrective action plan. Sanctions vary and may include financial restitution where appropriate. All contractors are provided ongoing technical assistance. In addition to monitoring, VR Standards also require ongoing self-evaluation by each contracted service provider.

CREDENTIALING REQUIREMENTS

Each VR contracted service provider must have one individual designated as the Director for VRD communication and accountability purposes. Each contracted service provider, excluding those providing post-acute brain injury services, must have a director who possesses University of North Texas director credentials.

To ensure that service providers in Texas are fully equipped to provide the highest quality employment services to Texans with disabilities, VRD has partnered with the University of North Texas to develop a training and credentialing process for employment service providers that provide job skills training, work readiness services, job placement services, and supported employment services to VRD customers. VRD also has partnered with the Center for Social Capital to develop the training and credentialing process for employment service providers that provide self-employment services to VRD customers.

Any service provider staff member who provides self-employment services to VRD customers must be certified by the Center for Social Capital as a Certified Business Technical Assistance Consultant (CBTAC).

Premiums are payments made to employment service providers in addition to the base rate paid for services when the VRD customer and/or service provider staff achieve certain criteria. Premium payments are available for job skills training, job placement, and supported employment. Premiums are offered for service providers that serve individuals who are deaf and individuals who have autism to encourage development of higher skills among the provider community. The premium payments for customers who are deaf became effective in December 2014 and in August 2015 for customers who have autism. Staff members who serve deaf customers must hold a certification from the Board for Evaluation for Interpreters, a Registry of Interpreters for the Deaf certification, or a Sign Language Proficiency Interview (SLPI) rating of intermediate or higher. For service providers to earn the premium when working with individuals with autism, they must show

proof that they have retained staff possessing the Autism Specialization from the University of North Texas.

Approved providers also receive training in the field from VRCs, state office program specialists, employment assistance specialists, University of North Texas online courses, and Criss Cole Rehabilitation Center staff. Training may include:

- disability awareness, including blindness, to give providers a better understanding of the challenges and limitations faced by customers;
- education on Americans with Disabilities Act requirements to ensure that providers understand the guidelines and law governing provision of accommodations to customers;
- education on other employment-related laws and recruitment, job matching, job customization, work accommodations, and retention;
- Texas Confidence Builders training, which provides the philosophy TWC VRD has adopted to help customers gain personal independence, acceptance, and adjustment to blindness, and find meaningful work; and
- accessible writing courses, which promote awareness and education related to the importance of accessibility in documents.

IDENTIFYING AND DEVELOPING VENDORS

Designated regional program specialists are responsible for identifying and developing entities that are interested in providing services described in the VR Standards. Program specialists provide technical assistance and guidance as new providers are approved and as existing providers add new services.

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.

Evidence of Collaboration, Contracts, and Agreements To provide seamless service delivery to customers and ensure effective use of resources, TWC VRD maintains the following collaborations with community partners and other state agencies: • VRD Program Specialists provide information and technical assistance to the appropriate Texas Health and Human Services Commission (HHSC) Medical and Social Service Divisions when changes to VR employment services occur. • VRD works with the appropriate HHSC Medical and Social Service Divisions to ensure that service definitions in the 1915(c) home- and community-based waivers accurately reflect Centers for Medicare and Medicaid Services and Rehabilitation Services Administration regulations. This partnership allows services that result in competitive integrated employment to be delivered efficiently and timely through the payer of first resort. • VRD offers free intensive training and technical assistance to HHSC's Medical and Social Services Divisions' Behavioral Health and Intellectual and Developmental Disabilities (IDD) Services Departments Special Projects Unit and community providers to become Benefits Subject Matter Resource staff. • VRD

partners with HHSC's Medical and Social Services Divisions' Behavioral Health and IDD Services Departments Special Projects Unit to provide cross training on the VR Long-Term Supports and Services System; • VRD uses its current partnership with the Social Security Administration (SSA) to encourage CRP providers to become employment networks (ENs) under the SSA Ticket to Work Program. VRD offers incentive payments to CRP-ENs that provide: • supported employment or job placement services during the provision of VR services; and • extended support to Ticket to Work customers after VR case closure in order to advance employment or increase customer earnings. • VRD partners with school districts that provide transition services to youth, and considers all aspects of the cooperative agreements in place to ensure continuity and timeliness of services for those school districts that initiate supported employment services before or after a student graduates. • VRD maintains membership and participation in the Association of People Supporting Employment First (APSE). • VRD has representation in the following: • The Texas Council for Developmental Disabilities • The Council for Advising and Planning for the Prevention and Treatment of Mental and Substance Use Disorders • Texas Coordinating Council for Veteran Services • State Independent Living Council • Texas Technology Access Program Advisory Council • Texas Council on Consumer Direction • The Promoting Independence Advisory Council • HHSC Statewide Behavioral Health Coordinating Council • HHSC Office of Mental Health Coordination Cross Agency Liaison Committee • Governor's Committee on People with Disabilities Contracts VRD has bilateral service contracts with CRPs to provide specific employment services, which include supported employment services. VRD counselors may refer customers with all disabilities, including blindness and visual impairments, to CRPs with contracts for supported employment services. The terms and conditions of CRP service contracts are provided in the VRD Standards for Providers manual.

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

TWC VRD continually seeks ways to increase the number of Texans with disabilities who successfully train for, obtain, and retain competitive employment. In 2015, legacy DARS implemented a significant series of strategies to contribute to this goal by establishing a cross-divisional Business Relations Team, created to improve services to local businesses and help them achieve a diversified workforce by hiring qualified individuals with disabilities. Throughout 2015, team members successfully partnered to provide a coordinated array of outreach, consultation, and technical assistance services to Texas businesses. The Business Relations Team developed a coordinated portfolio of services available to businesses, organized by three main service categories: outreach and disability awareness; consultation, support, and training; and job placement and retention assistance. Today, VRD provides a range of services to business partners, and staff has developed specialized training to address each of these service areas. The Business Relations Team developed a tool to facilitate the consolidation of business services. The resulting tool, called the business tracking tool, helps provide services to existing partnerships, expand partnerships to new businesses, coordinate services, and assess the effectiveness of all

services delivered to business partners. As part of the enhanced coordination in business outreach and service delivery, legacy DARS honored Texas business partners with awards for their commitment to, and success in establishing, a diverse and productive workforce. The Business Relations Team also developed and disseminated additional resources to Texas businesses, including a new Business Services website that provides information about the benefits of partnering with VRD, including available services, resources such as the Guide for Hiring People with Disabilities, and helpful websites. The Business Relations Team is increasing coordination with other state and federal entities that administer employment training programs, and is also working jointly with TWC's Business Services Unit. The result of this coordination is a growth in the number of jointly held business symposia and job fairs in communities across Texas. VRD partnerships with Boards and the U.S. Department of Labor Office of Federal Contract Compliance Programs will help ensure that local businesses and Texans with disabilities seeking competitive employment have the greatest level of support, resources, and services available to help them succeed.

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

In 2017, TWC launched the Pathways to Careers Initiative (PCI), which is an initiative to expand pre-employment transitions services (Pre-ETS) to Texas students with disabilities. PCI will ensure that Texas is effectively preparing students with disabilities to achieve competitive, integrated employment through participation in employability skills and work-readiness training, career exploration activities, work experience, and postsecondary education. Summer Earn and Learn was the first PCI strategy and involves employability skills training and paid work experience for students with disabilities. It was offered in each local workforce development area (workforce area) during the summer months, when students are out of school, and will continue to be offered in subsequent summers. Boards have developed work experience opportunities with employers in their workforce areas in high-growth occupations, skilled trades and crafts, and other high-demand occupations. Additionally, TWC leadership hosted the Benefits of Hiring People with Disabilities Forum in January 2017. This event was for business owners, human resources professionals, and hiring managers interested in key topics related to hiring employees with disabilities. VRD state office program specialists participated on a panel presentation during the event. Project HIRE VRD completed its fifth and final grant year of implementing Project HIRE, a unique supported education model that includes collaboration between VRD and community partners. The grant was funded by the Texas Council for Developmental Disabilities and, because of its success, South Texas College has hired a full-time educational coach to continue with the project. Project HIRE services supplement the VR program with wraparound services, including: • one-on-one support from educational coaches available both inside and outside of the classroom; • individual and family support through participant support groups and monthly support team meetings; • work experience opportunities and business mentoring days provided by Lower Rio Grande Valley Workforce Solutions for Project Hire students; • six-week summer bridge college-readiness program to prepare participants for college and employment; • individual participant-centered plans to help identify and achieve goals; and • individual business mentoring to help participants acquire the soft skills necessary for employment. Employers are engaged with Project HIRE through the project's business mentoring component. A fulltime Business Mentoring Coordinator sets up student internships with employers based on the student's

current employment goal, and works with the student and employer to ensure success at the worksite. To date, the program has served 52 students (ages 18—25) with a variety of disabilities, including autism, intellectual disabilities, deafness, blindness, cerebral palsy, speech disorders, and other neurological disorders, in Hidalgo County. Over 30 students have earned academic certificates at South Texas College in their chosen fields of study and 17 have secured employment. Project HIGHER Project HIGHER is a sister site to Project HIRE and follows the same model. It was developed through a partnership among legacy DARS, the University of Texas—El Paso, El Paso Community College, and the Volar Center for Independent Living. Workforce Solutions Borderplex and area businesses are also partners in this project. The first cohort of six students started in August 2015, and the project now has 21 participants in its third cohort. Project SEARCH The Project SEARCH business-led pre-employment training program is a one-year school-to-work program that takes place entirely at the workplace. The program includes a combination of classroom instruction, career exploration, and hands-on training through worksite rotations. Project SEARCH serves students with various disabilities, including significant intellectual and developmental disabilities. Typically, these are students who are on an IEP and in their last year of high school eligibility. The goal for these customers is competitive integrated employment within the business community or the business where the worksite rotations occur. Project SEARCH has expanded from one original program site established in 1996 at Cincinnati Children's Hospital in Ohio, to over 400 sites internationally. Project SEARCH in Texas began in 2007 with Seton Healthcare Family in Austin. As of fall 2017, Texas has 27 Project SEARCH sites. Each site is led by a host business and includes key partners, including VRD, ISDs, CRPs, and local authorities. The expansion of this program in Texas is due in part to a five-year grant awarded by the Texas Council for Developmental Disabilities. The grant pays for the onetime technical assistance fee to the Project SEARCH staff in Ohio, which is required to start any new sites. In its first year, the grant started three sites in the 2013—2014 school year, in addition to the three sites that already existed in Austin. Since that time, eight additional sites were added under the grant and the other eleven started with funding from ISDs or business partners. Each Project SEARCH site typically has 8—12 participants per year. The total number of customers participating in Project SEARCH for the 2017—2018 school year is 194.

Texas Project SEARCH Locations and Partners

	Partner Name	Location	Number of Interns
1	Atlas Copco Drilling Solutions, Garland, TX	Garland ISD, VRD, Quest Employment	8 Interns
2	Baylor Scott & White Hospital, Garland, TX	Garland ISD, VRD, Quest Employment	10 Interns
3	Medical Center of Lewisville, Lewisville, TX	Lewisville ISD, VRD, Quest Employment	10 Interns

	Partner Name	Location	Number of Interns
4	The City of Lewisville Offices, Lewisville, TX	Lewisville ISD, VRD, Quest Employment	10 Interns
5	Texas Wesleyan University, Fort Worth, TX	Fort Worth ISD, VRD, Goodwill Industries of Ft. Worth, MHMR of Tarrant County	10 Interns
6	Seton Burnet Healthcare Center, Burnet TX	Liberty Hill ISD, VRD, Goodwill Industries of Central TX, Bluebonnet MHMR	6 Interns
7	Seton Medical Center Hays, Kyle, TX	Hays Consolidated ISD, VRD, Goodwill Industries of Central TX, Hill Country MHMR	9 Interns
8	Seton Medical Center Williamson, Round Rock, TX	Round Rock ISD, VRD, Goodwill Industries of Central TX, Bluebonnet MHMR	10 Interns
9	Seton Northwest, Austin, TX	Leander & Georgetown ISDs, Rehabilitation Services, Goodwill Industries of Central TX, Bluebonnet MHMR	12 Interns
10	Baylor Scott & White Hospital, College Station, TX	College Station ISD, VRD, Brazos Valley Center for Independent Living, MHMR of Brazos County	5 Interns
11	Baylor Scott & White Hospital, Brenham, TX	Brenham ISD, VRD, The Whole Solution, MHMR of Brazos County	5 Interns
12	United Healthcare, Sugarland, TX	Fort Bend ISD, VRD, Texana	10 Interns
13	SanMar, Inc., Irving, TX	Irving ISD, VRD, Dallas Metrocare Services	10 Interns
14	Dell Medical Center UT, Austin, TX	Austin ISD, VRD, Goodwill of Central TX, Austin Integral Care	10 Interns
15	Embassy Suites Dallas Frisco Conference Center, Frisco, TX	Frisco ISD, DARS, Lifepath	12 Interns
16	Christus Trinity Mother Frances Hospital and Clinics, Tyler, TX	Tyler ISD, VRD, Winning Edge Employment, Andrews Center	10 Interns
17	La Cantera Hill Country Resort, San Antonio, TX	San Antonio North ISD, VRD, PCSI, Alamo Local Authority	8 Interns
18	Lakeway Regional Medical Center, Austin, TX	Lake Travis & Eanes ISD, VRD, Easter Seal, Austin Integral Care	7 Interns
19	Texas Children's Health Plan, Houston, TX	Houston ISD, VRD, SCI, MHMR	11 Interns
20	Baylor Scott & White Plano, Plano, TX	Plano ISD, VRD, LifePath	12 Interns

	Partner Name	Location	Number of Interns
21	Palo Alto Community College, San Antonio, TX (program on hold this year)	Somerset and South Side ISDs, VRD, River City Group, Alamo Local Authority	0 Interns
22	Christus Santa Rosa Children's Hospital	San Antonio ISD, VRD, PCSI, Alamo Local Authority	10 Interns
23	The Hospitals of Providence El Paso	El Paso ISD, VRD, Nidia Escobar	10 Interns
24	Covenant Health Hospital	Lubbock Cooper ISD, Frenship ISD, Levelland ISD, VRD, Quest Employment	10 Interns
25	Texas Health Presbyterian Hospital Dallas	Richardson ISD, VRD, Quest Employment	10 Interns
26	Hilton Hotel, College Station	Bryan ISD, VRD, Brazos Valley Center for Independent Living, MHMR of Brazos County	8 Interns
27	Dow Chemical, Freeport	Brazosport ISD, VRD, SCI	9 Interns

Summer Earn and Learn

TWC's Pathways to Careers Initiative (PCI) is an initiative to expand Pre-ETS to students with disabilities during the summer months. It began in the summer of 2017. The first of five strategies, Summer Earn and Learn is a work-based learning program conducted in partnership with Boards and their employer partners. This statewide strategy includes employability skills training and paid work experience for students with disabilities. More than 1,500 students and more than 600 employers participated in Summer Earn and Learn in 2017.

S.W.E.A.T. Program

In collaboration with the Texas School for the Blind and Visually Impaired, VRD holds a five-week summer work program called S.W.E.A.T. (Summer Work Experience in Austin, Texas) in which up to 15 students who are blind or visually impaired are trained in employability skills, independent living skills, and mobility training, and gain four weeks of work experience with businesses in the Austin area. It is a program designed to prepare students for success in the world of work and adult living through increased independence, competence, and self-confidence.

W.A.C.O. @ TX A&M Program

VRD collaborates with the Brazos Valley Center for Independent Living and Texas A&M Center on Disability and Development to hold the W.A.C.O. (Work and College Opportunities) @ Texas A&M summer work program. Participants receive development and instruction in professionalism, self-determination, and teamwork. They experience and learn about college opportunities and work in the community16-20 hours a week while living on campus.

Project SWEEP

In collaboration with West Texas Education Service Centers, Project SWEEP is a five-week summer work program for high school students with disabilities. The first week of the program focuses on job-readiness training, followed by four weeks of real work experience. Students are housed at Texas Tech University. The program covers daily living skills, orientation and mobility skills, job-seeking skills, on-the-job skills, and socialization/recreational skills.

Additional Strategies

VRD updated transition policy and began providing training to staff members to increase their awareness of WIOA and its requirements for coordination with employers. Best practices are being developed based on successful strategies that existed before WIOA and the requirements that have been put in place as a result of WIOA. In addition to providing training and guidance to staff, VRD continues to enhance and expand quality assurance processes to ensure that all staff members use consistent practices and processes.

VRD will also leverage existing business partnerships to identify additional opportunities to better prepare students for the workplace and help them obtain jobs. VRD will pursue additional partnerships with businesses that have an interest in pre-employment training for high school students to ensure that students entering the workforce are appropriately equipped with the technology and skills to adapt to work in the 21st century.

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;

Texas Health and Human Services Commission TWC VRD will continue to collaborate with HHSC, the state agency responsible for providing services to individuals with developmental disabilities and administering the state Medicaid plan under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.). Collaboration occurs in the delivery of VR services, including extended services, for individuals with the most significant disabilities who have been determined to be eligible for home and community-based services under a Medicaid waiver, Medicaid state plan amendment, or other authority related to a state Medicaid program. VRCs provide information to mutually served customers to assist them in understanding how to navigate the long-term support and services system. Additionally, VRD works with HHSC Medicaid/CHIP to resolve individual and system issues involving mutually served customers, particularly those transferring from Supplemental Security Income (SSI) to Title II Childhood Disability Beneficiaries to ensure continuation of Medicaid 1915(c) waiver services.

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

TWC VRD will continue to collaborate with HHSC, the state agency responsible for providing services to individuals with developmental disabilities and administering the state Medicaid

plan under Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.). Collaboration occurs in the delivery of VR services, including extended services, for individuals with the most significant disabilities who have been determined to be eligible for home and community-based services under a Medicaid waiver, Medicaid state plan amendment, or other authority related to a state Medicaid program. VRCs provide information to mutually served customers to assist them in understanding how to navigate the long-term support and services system. Additionally, VRD works with HHSC Medicaid/CHIP to resolve individual and system issues involving mutually served customers, particularly those transferring from Supplemental Security Income (SSI) to Title II Childhood Disability Beneficiaries to ensure continuation of Medicaid 1915(c) waiver services.

Social Security Administration TWC VRD coordinates with the Social Security Administration (SSA) to encourage CRP providers to become employment networks (ENs) under SSA's Ticket to Work Program. TWC VRD offers incentive payments to CRP-ENs that provide: • supported employment or job placement services during the provision of VR services; and • extended supports to Ticket to Work customers after VR case closure in order to advance employment or increase customer earnings. TWC VRD and select CRPs participate in the Partnership Plus program. Additionally, VRD is participating in the Promoting Opportunity Demonstration (POD) pilot that will test a benefit offset in the Social Security Disability Insurance program to determine its effects on outcomes such as earnings, employment, and benefit payments. SSA and HHSC have a data exchange agreement that allows HHSC to access SSA data. Through a third-party agreement (State Verification and Exchange System), VRD is able to obtain SSA data regarding cost reimbursement from HHSC.

Plans for Improving Supported Employment Services TWC VRD will continue to strengthen the numerous supported employment service improvements implemented by legacy DARS in 2017, including the following: • Assisting CRPs in using the Supported Employment Assessment that focuses on discovery and person-centered techniques, vocational theme development, and providing worksite observations; • Working with VRCs on applying the supported employment planning and service provision to improve customer participation and informed choice by requiring review and signatures at each benchmark; • Providing ongoing training to TWC's VRD subject matter experts, who provide technical assistance to VRCs on identifying and coordinating extended service/long-term support before beginning the benchmark process; • Ensuring that all criteria for determining job stability to ensure extended service/long-term support after VR case closure are being applied; and • Continuing to provide specific employment services to people with autism to improve their success in obtaining and maintaining employment.

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

Mental Health VRD promotes mental health evidence-based practices and other evidence-informed models of service that will improve competitive integrated employment outcome strategies for customers. Other examples of collaboration include: increasing coordination and developing new partnerships with other state and community organizations—mental health organizations, local authorities, DSHS, and universities—that serve individuals with developmental or intellectual impairments and mental health disorders to develop resources, expand knowledge, and implement best practices; working with the HHSC Office of Mental Health to identify and implement best practices, engage potential community

partners, and facilitate service coordination; and participating in the Mental Health First Aid training conducted by local mental health authorities, which teaches VRCs and other professionals how to assist someone experiencing a mental health crisis. Training is another area that emphasizes interagency cooperation. VRD program specialists provide the following training: • Annual training on the VR programs to Home and Community Based Services waiver providers, service coordinators and case managers, the Private Provider Association of Texas, Providers Alliance for Community Services of Texas members, community centers staff, including customer benefits officers, and the Statewide Intellectual and Developmental Disabilities Consortium; • Training on VR services and benefits and work incentives to HHSC Managed Care Organization service coordinators and management, and other service providers and Medicaid waiver case managers; • Training on TWC employment services, benefits, and work incentives to members of the seven statewide mental health peer-operated support groups; and • Training on benefits and work incentives every six months for TWC VRD staff, CRPs, HHSC providers, and IDD and mental health staff; • Overview of benefits and work incentives to HHSC staff, providers, and other community stakeholders throughout the year; • Overview of TWC VR services and best practices for mutually served customers for HHSC Service Coordinators, Case Managers, private providers, and other staff; • Overview of Wellness Recovery Action Plan (WRAP) for community partners; • Training to CRPs statewide on best practices in the provision of employment services to individuals with the most significant disabilities; and • Training on assistive technology for community partners

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;

VRD is committed to ensuring that consumers receive services from qualified rehabilitation professionals as set forth in §101(a)(7) of the Rehabilitation Act of 1973 as amended by WIOA and 34 C.F.R. §361.18. VRD has established procedures to support the Comprehensive System of Personnel Development (CSPD). RCT provides input to VRD in addressing issues related to personnel development. The Policy, Procedures, and Personnel Development Committee of RCT meets quarterly to discuss the development and maintenance of policies and procedures in support of the CSPD standard.

Qualified Personnel Needs

As of October 1, 2017, the Vocational Rehabilitation Division (VRD) had 1,314 full-time employment (FTE) staff positions to provide direct services to VR customers, broken down as follows:

• Vocational Rehabilitation Counselors (VRCs)

• Transition Vocational Rehabilitation Counselors (TVRCs)

• Unit Support Coordinators (USCs)

• Vocational Rehabilitation Teachers (VRTs)

• Rehabilitation Assistants (RAs)

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

As of October 1, 2017, the average size of VR counselor caseloads was 89.79 customers, and the average size of TVRC caseloads was 86.25 customers. This considers all cases open as of that date, whether the caseload was vacant or filled.

During the combination of the two legacy DSUs, VRD added 48 new TVRC positions by converting vacant non-VRC positions into new TVRC positions and by converting some vacant VRC positions into new TVRC positions. Many of the converted positions were not caseload-carrying positions so they may not have caseloads assigned to them yet and are therefore not accounted for in the data reported above. The following table identifies the number of VRD staff members needed to provide direct customer services, with projections of numbers needed over four years based on present staffing and estimates of the growth in numbers of eligible customers served. Table 1: Projected Vocational Rehabilitation Division Personnel Needs through FFY'20 (Combined VRD) Job Title FFY'18 Total Positions FFY'18 Vacancies as of 1/1/18 FFY'19 FFY'20 Total Need VRC 534 86 1 1 2 TVRC 153 33 0 0 0 Unit Support Coordinator 29 0 0 0 0 Criss Cole Rehabilitation Center VRC 4 0 0 0 0 Vocational Rehabilitation Teacher 41 5 0 0 0 Rehabilitation Assistants 412 54 0 1 1 Table 1 notes: • Vacancies column is as of January 1, 2018, per Active Position Report. • Vacancies numbers are not additional positions, but part of the total position count. • Projected personnel needs for FFY'19 and FFY'20 were calculated by applying the growth rate for eligible customers served (0.1 percent per year) from the Annual Estimates section to maintain staff to customer ratio. Based on current staffing plans and the estimated gradual growth in the number of total eligible individuals served, VRD estimates that it needs additional FTEs to support the rehabilitation program during the next two years as follows: two additional VRC FTEs needed between 2019 and 2020, and one additional RA FTE needed between 2019 and 2020 (See Table 1). VRD anticipates that it will be able to meet the need for more staff capacity to deliver services for the current biennium through the work that VRD completed during the two DSUs in FY'18 and through the efficiencies VRD expects to gain through its current and future Rapid Process Improvement (RPI) activities. VRD has already added 48 new TVRC positions and is currently working to fill these newly created vacant positions. Regarding the additional RA FTEs needed between 2018 and 2020, when VRD combined the two legacy DSUs, in addition to adding 48 TVRC positions, it simultaneously assigned an RA to every two counselors to achieve a ratio of one RA for every two counselors. VRD was able to assign RAs without the need for requesting additional RA FTEs because, when the legacy DSUs were combined, VRD had an excess of RA positions when,

for example, one RA was assigned to a single counselor. VRD further anticipates achieving additional RA capacity through its RPI activities. Table 2: Vocational Rehabilitation Division Attrition Rate as of October 1, 2016 Job title Average Strength (average filled positions) Total Separations Volun Invol Retire Other (transfer to outside agency) Year-to-date (YTD) Rate Vol YTD Rate VRC 583.5 92 66 6 13 7 15.77% 11.31% TVRC 97.75 15 11 0 2 2 15.35% 11.28% Table notes: • YTD Rate calculated by dividing Total Separations by Average Strength • Vol YTD Rate calculated by dividing Volun by Average Strength • Attrition Rate information provided by TWC Human Resources Outreach activities will continue to be conducted to broaden the population of individuals with disabilities being served by VRD. Outreach, education, and awareness efforts will be targeted to underserved and unserved populations such as transition students, veterans, and individuals with neurodevelopmental disorders (including autism), and psychological disorders such as bipolar disorder or schizophrenia.

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.

Table 1: Projected Vocational Rehabilitation Division Personnel Needs through FFY'20 (Combined VRD) Job Title FFY'18 Total Positions FFY'18 Vacancies as of 1/1/18 FFY'19 FFY'20 Total Need VRC 534 86 1 1 2 TVRC 153 33 0 0 0 Unit Support Coordinator 29 0 0 0 0 Criss Cole Rehabilitation Center VRC 4 0 0 0 0 Vocational Rehabilitation Teacher 41 5 0 0 0 Rehabilitation Assistants 412 54 0 1 1 Table 1 notes: • Vacancies column is as of January 1, 2018, per Active Position Report. • Vacancies numbers are not additional positions, but part of the total position count. • Projected personnel needs for FFY'19 and FFY'20 were calculated by applying the growth rate for eligible customers served (0.1 percent per year) from the Annual Estimates section to maintain staff to customer ratio. Based on current staffing plans and the estimated gradual growth in the number of total eligible individuals served, VRD estimates that it needs additional FTEs to support the rehabilitation program during the next two years as follows: two additional VRC FTEs needed between 2019 and 2020, and one additional RA FTE needed between 2019 and 2020 (See Table 1). VRD anticipates that it will be able to meet the need for more staff capacity to deliver services for the current biennium through the work that VRD completed during the two DSUs in FY'18 and through the efficiencies VRD expects to gain through its current and future Rapid Process Improvement (RPI) activities. VRD has already added 48 new TVRC positions and is currently working to fill these newly created vacant positions. Regarding the additional RA FTEs needed between 2018 and 2020, when VRD combined the two legacy DSUs, in addition to adding 48 TVRC positions, it simultaneously assigned an RA to every two counselors to achieve a ratio of one RA for every two counselors. VRD was able to assign RAs without the need for requesting additional RA FTEs because, when the legacy DSUs were combined, VRD had an excess of RA positions when, for example, one RA was assigned to a single counselor. VRD further anticipates achieving additional RA capacity through its RPI activities. Table 2: Vocational Rehabilitation Division Attrition Rate as of October 1, 2016 Job title Average Strength (average filled positions) Total Separations Volun Invol Retire Other (transfer to outside agency) Year-to-date (YTD) Rate Vol YTD Rate VRC 583.5 92 66 6 13 7 15.77% 11.31% TVRC 97.75 15 11 0 2 2 15.35% 11.28% Table notes: • YTD Rate calculated by dividing Total Separations by Average Strength • Vol YTD Rate calculated

by dividing Volun by Average Strength • Attrition Rate information provided by TWC Human Resources Outreach activities will continue to be conducted to broaden the population of individuals with disabilities being served by VRD. Outreach, education, and awareness efforts will be targeted to underserved and unserved populations such as transition students, veterans, and individuals with neurodevelopmental disorders (including autism), and psychological disorders such as bipolar disorder or schizophrenia.

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;

Texas has a total of six university rehabilitation programs available at the master's degree level during the 2017—2018 school year: • Stephen F. Austin University • University of North Texas • University of Texas at Austin • University of Texas at Rio Grande Valley • Texas Tech University • University of Texas at El Paso

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

A total of 81 students graduated in 2016—2017 from the in-state universities listed in Table 3 with credentials consistent with academic preparedness to meet national rehabilitation counselor certification requirements. Texas has also developed partnerships with out-of-state university distance-learning programs. These universities include: • University of Kentucky • Southern University at Baton Rouge University Type of Program Current Enrollments University of Kentucky Master's Rehab. Counseling 1 Southern University at Baton Rouge Master's Rehab. Counseling 1

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.

Table 3: FFY'17 Students Enrolled and Previous-Year Graduates Institution University Students Enrolled University Graduates from the Previous Year Texas Tech University 104 32 University of North Texas 185 31 University of Texas at Rio Grande Valley 177 1 University of Texas at Austin 9 6 Stephen F. Austin University 12 1 University of Texas at El Paso 20 10 TOTAL 507 81

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.

VRD has forged productive, proactive working relationships with Texas universities that train rehabilitation professionals. Involvement with Texas universities results in student requests for practicum and internship placements within VRD. Internships have been offered since 1999 for students completing master's degrees in Rehabilitation Counseling or Rehabilitation. In FY'17, VRD hosted 20 internships. Evaluations of student interns come directly from certified, licensed, or Qualified Vocational Rehabilitation Counselor (QVRC) internship supervisors and department advisors from the intern's university. Job vacancy notices are routinely posted on WorkInTexas.com, TWC's statewide online jobsite. Hiring supervisors can also request a broader distribution of vacancy notices by having TWC Human Resources post them to additional sites such as Indeed.com, Monster.com, and others. Recruitment continues for bilingual Spanish- and English-speaking candidates to fill positions located in areas with high Spanish-speaking populations. Opportunities to promote employment to all community sectors are achieved by sharing job postings with universities. VRD encourages the hiring of qualified individuals with disabilities, and strives to ensure that staff represents ethnic diversity and thereby reflects the population of Texas and the customers we serve. Ethnic distribution of VRD employees and Texas residents is shown below.

Ethnic Group VRD Employees Texas Residents Caucasian 40.2% 50.8% Hispanic 31.2% 31.7% African American 26.3% 13.5% Other 2.3% 9.6%

Note: Percentages do not total 100 percent in every column due to rounding and the fact that the American Community Survey assesses race and Hispanic/Latino ethnicity separately (some individuals of African American or other race are also Hispanic/Latino).

Additionally, approximately 7.24 percent of VR employees have a reported blindness or visual impairment disability. Legacy DARS Program Reporting and Analysis (PRA) calculated turnover by dividing the number of employee losses by the average number of employees for the reporting period and multiplying by 100 to determine the percent turnover. For the purpose of calculating the agency turnover, losses are counted only when an individual terminates employment with the agency. Losses do not include vacancies created as a result of employee promotions, reclassifications, demotions, or transfers within the agency. VRD has established several strategies for recruitment, preparation, and retention of qualified personnel. Plans reflect continued annual needs assessment, quarterly review of strategies and interventions for recruitment, and updated review of the QVRC program following each semester to ensure satisfactory progress.

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

Qualified Vocational Rehabilitation Counselors VRD is committed to ensuring its workforce is highly skilled, professionally trained, and duly prepared to serve Texans with disabilities with the highest quality service delivery. Toward this goal, VRD has a plan to achieve standards for counseling staff in compliance with §101(a)(7) of the Rehabilitation Act as amended by WIOA and 34 C.F.R. §361.18. There are no state-approved certifications or licensing requirements for VR counselors in Texas. Therefore, VRD has established standards for academic preparedness consistent with the national requirements of the Commission on Rehabilitation Counselor Certification (CRCC) for Certified Rehabilitation Counselor (CRC) certification.

B. THE ESTABLISHMENT AND MAINTENANCE OF EDUCATION AND EXPERIENCE REQUIREMENTS, IN ACCORDANCE WITH SECTION 101(A)(7)(B)(II) OF THE REHABILITATION ACT, TO ENSURE THAT THE PERSONNEL HAVE A 21ST CENTURY UNDERSTANDING OF THE EVOLVING LABOR FORCE AND THE NEEDS OF INDIVIDUALS WITH DISABILITIES.

VRD ensures that staff is well-qualified to assist individuals with disabilities. There is emphasis of educational requirements at the bachelor's, master's, and doctoral levels in fields related to rehabilitation. However, the degree field may include other degrees that prepare individuals to work with customers and employers. For example, bachelor degrees might include not only VR counseling, but also social work, psychology, disability studies, human resources, special education, or another field that reasonably prepares individuals to work with customers and employers. For individuals hired at the bachelor's level, there is a requirement for at least one year of paid or unpaid experience related to direct work with individuals with disabilities. VRD recognizes master's or doctoral degrees in fields of specific study, such as VR counseling, clinical rehabilitation counseling, behavioral health, behavioral science, disability studies, human relations, human services, marriage and family therapy, occupational therapy, psychology, psychometrics, rehabilitation administration/services, social work, special education, vocational assessment/evaluation, or another field that reasonably provides competence in the employment sector in a disability field or rehabilitation-related fields. A counselor meets the CSPD standard by holding a master's degree in VR counseling; master's degree in "counseling or counseling-related field" with specific coursework; master's, specialist, or doctoral degree in specific majors with specific coursework; current CRC certificate from CRCC; or current LPC licensure. Therefore, a counselor with a master's degree in counseling or a counseling-related field must, at a minimum, complete a graduate course in the Theories and Techniques of Counseling and successfully complete six graduate courses with a primary focus in the following areas: • one course on assessment; • one course on occupational information or job placement; • one course on case management and rehabilitation services; • one course on medical aspects of disabilities; • one course on psychosocial aspects of disabilities; and • one course on multicultural issues. A counselor with a master's or doctoral degree in one of the listed specific fields of study must complete a graduate course on the Theories and Techniques of Counseling, and successfully complete six graduate courses each with a primary focus in the areas listed, plus one course on Foundations of Rehabilitation Counseling. Although VR has taken steps to hire rehabilitation counselors with master's degrees in VR counseling, a number of factors pose challenges to this undertaking. A significant barrier to hiring counselors with master's degrees in rehabilitation counseling is the expanse of Texas that must be served. VR affords

rehabilitation assistants (RAs) who attain an undergraduate degree the opportunity for employment in VR as VRCs. The years of knowledge and experience on a caseload coupled with their undergraduate degree have proven beneficial to VR.

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

Staff Development VRD is committed to ensuring that its diverse workforce is highly skilled, professionally trained, and thoroughly prepared to provide the highest quality service to Texans who are disabled. Additionally, VR strongly supports specialized training and maintaining specialty caseloads in the areas of blindness and visual impairments, deafness and hard of hearing, and transition, to name a few. Our training curriculum is designed to help staff gain a 21st century understanding of the evolving labor force and the needs of individuals with disabilities. All staff has access to internal and external training designed to develop the knowledge and skills necessary to achieve success in their positions, provide developmental activities for new and emerging leaders, and enhance service delivery for customers. Trainings are delivered through classroom, webinar, and teleconference. Orientation to Rehabilitation and Blindness training is a one-week program attended by all newly hired VR staff members, except for part-time employees. Participants develop an awareness of the nature of blindness and the impact it has on all aspects of a person's life. Introduction to Blindness training is a two-week program that introduces participants to the nonvisual blindfold training strategy. Under blindfold, staff members experience the key emotional factors and learn alternative techniques in the adjustment to blindness process, discovering that blindness does not preclude an individual from living an independent and successful life. Immersion Training is a four- to six-week program. Application of the Texas Confidence Builder philosophy, using the least restrictive adaptation model, structured discovery, problem solving, and adult learning theory includes techniques to facilitate emotional adjustment to blindness. The Orientation and Mobility portion of Immersion Training allows for individualized training and opportunity for immediate feedback. Eye Medical is a three-day training designed to provide staff members with a basic understanding of the anatomy of the eye, familiarize them with pathological conditions causing vision loss, and develop a referential body of knowledge related to diagnostics, treatment, training, and long-term vocational implications. Staff is encouraged to be aware of current research by using the Internet Resources link available on TWC's Intranet. Information disseminated by the National Institute on Disability and Rehabilitation Research and a variety of other government and university research centers can be reached from this link. Many VR staff members are leaders or active members of the Association of Education and Rehabilitation of the Blind and Visually Impaired. Individual training plans are developed for all new counselors. Training plans for new employees foster

competencies in skills required for different job categories. TWC's Training and Development provides or coordinates more formal, extensive trainings for caseload carrying staff. Many of the courses in the Master's in Rehabilitation Counseling degree provide opportunities for practical application on actual caseloads. Counselors and other staff learn about assistive technology, including screen readers, voice-activated software, special keyboards, braille devices, closed circuit televisions, portable note takers, etc., as part of the intensive Employment Assistance Training program. VR Teachers (VRTs) are provided with a three-year individual training plan that includes the following: • Four weeks wearing a blindfold at the Criss Cole Rehabilitation Center participating in classes with customers; • Three weeks of training in teaching, process, procedures, and employment assistance training for VRTs; • Extensive braille training—all VRTs must demonstrate competency annually by completing The Annual Braille Project and submitting it for review by the VRT Program Specialist; and • Training transcripts, letters of recommendation from a certified VRT, and funding to help interested teachers become academy certified. All staff members participate with their supervisors in planning annual goals and identifying training needs and goals. Combined with input received from VR managers and administrators, this process assesses training needs and determines annual training calendar offerings. VRD meets adaptive communication needs. For example, with the Limited English Proficiency (LEP) Language Line, staff members can establish communication with customers in numerous languages, including those commonly found in Texas. Many customers and staff members who are blind or visually impaired need alternative formats for printed communications. A full-time employee in the VR Braille Unit prepares documents in braille, large print, or electronic format. Dedicated computers with braille translation software and braille embossers are available in each field office. Staff uses these to produce documents, such as letters to customers or meeting agendas. VRD employs Assistive Technology Specialists to support staff using assistive programs with standard agency software to complete their job duties. The specialists assess staff skill levels, recommend and implement training approaches, and coordinate service delivery statewide. The Deafblind Unit serves customers who are deafblind. Specialists fluent in sign language consult with caseload-carrying staff, customers, and community resources to develop and implement plans and services. VRD also purchases state-certified interpreter services as needed. VRD works closely with the education system in transitioning students with disabilities from high school to postsecondary training or employment. TVRCs participate in training covering the Admission, Review, and Dismissal (ARD) process as well as the Individualized Education Program (IEP). When conducting seminars or workshops for the ARD and IEP process, trainers may also include parents and professionals from: • TEA's Special Education Division • Regional education service centers and local education agencies (LEAs) • Disability Rights Texas • Partners Resource Network, Inc. • Texas School for the Blind and Visually Impaired Additionally, VR staff participates in cross-trainings with other entities involved in education for students with visual loss, such as the Texas Association for Education and Rehabilitation of the Blind and Visually Impaired, and sponsors and participates in workshops and seminars to help education staff members develop expertise in working with these students. VRD is committed to maintaining support for in-service and academic training that ensures all staff receives the necessary knowledge and skills to be successful and that provides developmental activities for new and emerging leaders. While there are a number of positions within VR that support field operations, the focus of statewide training is typically programmatic to enhance direct service delivery to

customers. All staff has access to training opportunities through the professional development plan created through the management chain's professional development process. Training content for field staff is typically developed within the system of statewide training product modules disseminated through field management staff. Content learning includes topics that directly relate to the knowledge, skills, abilities, and attitudes necessary to perform jobs as expected by management and as detailed in job descriptions. Content training strategies include the following: • Continued focus on the foundations of the VR process for counselors and RAs, including accurate eligibility determination, inclusion of customers in planning for service delivery, thorough assessment and planning practices, models for VR counseling, informed customer choice, service to culturally diverse populations, purchasing practices, supported employment, customized employment, and other strategies for quality employment assistance, service delivery, and effective case note documentation; • Training in working with employers and customers to increase knowledge of the Americans with Disabilities Act, the Rehabilitation Act Amendments of 1998, the Olmstead decision, available independence initiatives, and WIOA to enhance employment options and employment knowledge; • Training in the Individuals with Disabilities Education Act, appropriate options and alternatives for effective transition services and Social Security work incentive programs, including programs under the Ticket to Work and Work Incentive Improvement Act of 1999; • Training in assessing appropriate rehabilitation technology interventions; • Extending opportunities to take advantage of training available from external sources for ongoing dissemination of timely trends related to disability and treatment modalities within the field of rehabilitation; • Coordinating with the Texas Administrators of Continuing Education and other entities as appropriate to develop localized training in targeted disability areas; and • Implementation of training for new counselors that focuses on critical thinking and sound decision making.

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.

VRD staff is encouraged to be aware of current research by using the Internet Resources link available on TWC's Intranet. Information disseminated by the National Institute on Disability and Rehabilitation Research and a variety of other government and university research centers can be reached from this link. VR works closely with the Mississippi State University Research and Training Center on Blindness and Low Vision and other research and training centers to stay current in the field of blindness. VRD will initiate outreach and increase staff knowledge and skills in effective rehabilitation strategies for serving such customers by: • researching and implementing best practices; • building staff capacity and expertise to serve individuals who are blind and have additional disabilities (e.g., through the implementation of the Mental Health First Aid training, a full-day course that should be taken by all staff members who have direct contact with customers); and • increasing coordination and developing new partnerships with other state and community organizations, including mental health organizations, HHSC's Office of Mental Health Coordination, and the Helen Keller National Center for deafblind youth and adults. VRD managers receive training on a variety of management issues, including ethics, communication, leadership, monitoring for quality service delivery and compliance, and management information system tools. VRD has also developed partnerships with organizations such as the National Council on Rehabilitation Education to ensure the active

dissemination of research development for the field of rehabilitation. Additionally, VR uses studies from the Institute on Rehabilitation Issues to assist in the development of practices for service delivery. New Counselors All new counselors are trained using a sequence of learning events. The sequence includes an assigned coach who uses a published quick start guide, which includes a learning plan for on-the-job training and required and optional courses. The learning plan guides the new counselor's learning activities during the initial probationary period. Based on the learning plan, training is provided throughout the initial year through a series of required courses, peer training, and coaching sessions that focus on learning to guide each customer to successful achievement of his or her employment and/or independent living goals. Training covers VR policies and procedures as well as values-based decision making, informed customer choice, employment assistance, and successful closures. Additionally, new counselors learn effective strategies for caseload management, working with Community Rehabilitation Program (CRP) providers, assessing employment trends, matching employer needs to qualified consumers, and building successful partnerships with customers, businesses, schools, and other community resources. Following completion of the probationary period, the counselor and supervisor create a professional development plan, which addresses the required educational standards of their position. The professional development plan is updated annually regarding training activities and progress toward meeting educational requirements. New RAs All new RAs are trained using a sequence of learning activities. The sequence includes an assigned coach and a quick start guide, which includes a learning plan for on-the-job training and required and optional courses. Training is provided throughout the initial year through attendance at a required course on RA fundamentals, other courses as assigned by the RA's supervisor, peer training, and coaching sessions. The fundamentals course focuses on the roles of the RA in facilitating successful employment outcomes for customers. The required course addresses both internal and external customer service, purchasing, disability etiquette, and an overview of values-based decision making and the RA's role in the VR process. Following completion of the initial training period, the RA and supervisor develop a professional development plan that identifies additional training and development activities to support the RA's successful performance. New Vocational Rehabilitation Managers New VR managers also participate in a sequence of learning activities to develop their skills and competencies. This sequence includes a regional orientation followed by a series of self-directed activities guided by a comprehensive orientation outline. These activities provide training for new managers in VR program management, effective coaching, and values-based decision making. Following completion of the initial learning activities, the new manager receives professional development training in management courses, which may be through the Governor's Center for Management Development and other available resources. A regional director guides the new manager through this process. VR managers comply with TWC's performance planning and review policy for evaluating the performance of VR staff within the division. This system requires that supervisory personnel formally evaluate an employee's performance in the essential functions of the employee's position as per TWC Human Resources policies. This system promotes clear understanding between the supervisor and the employee of the priorities and objectives for the upcoming period. In reviewing performance against expectations, emphasis is placed on results achieved through service delivery, identification of reasons for variance from expected results, and establishment of appropriate development plans that serve to deliver skill-enhancing, practical learning opportunities. RCT has the opportunity to review and comment on the

policies, procedures, and programmatic direction of the VRD. RCT representatives are invited to fully participate in development and review of policies and procedures. VR directors meet quarterly with RCT to present updates and share input regarding knowledge, skills, and abilities of VR staff and overall VR program outcomes. In summary, a comprehensive and overarching training design is in place to meet the learning needs of all VR staff. While these activities are provided in a myriad of venues and through multiple modalities, all opportunities for training are specifically directed toward skill enhancement and credential building to form the most qualified staff possible to deliver services to customers in Texas. Although all staff does not have direct customer contact, all staff has a direct impact on the success of the VR program in providing vocational and independence opportunities to the community of individuals with disabilities that VR serves.

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.

Personnel to Address Individual Communication Needs One manner in which VRD meets adaptive communication needs is by using the LEP Language Line. This allows staff to communicate with customers in numerous languages, including those commonly found in Texas. Many customers and staff members who are blind or visually impaired need alternative formats for printed communications. A full-time employee in the VR Braille Unit prepares documents in braille, large print, or electronic format. Dedicated computers with braille translation software and Braille embossers are available in each field office. Staff uses these to produce documents, such as letters to customers or meeting agendas. VRD employs Assistive Technology specialists to support staff using assistive programs with standard agency software to complete their job duties. Specialists assess staff skill levels, recommend and implement training approaches, and coordinate service delivery statewide. The Deafblind Unit serves customers who are deafblind. Specialists fluent in sign language consult with caseload carrying staff, consumers, and community resources to develop and implement plans and services. VRD also purchases state-certified interpreter services as needed. Additionally, VR staff participates in cross-trainings with other entities involved in education for students with visual loss, such as the Texas Association for Education and Rehabilitation of the Blind and Visually Impaired, and sponsors and participates in workshops and seminars to help education staff members develop expertise in working with these students. In an effort to provide quality resources to assist customers in making an informed choice regarding VR providers, legacy DARS developed and maintains ReHabWorks (RHW), an electronic case management system. RHW contains information specific to each CRP vendor. VR staff has access to and shares provider information regarding qualifications, services provided, location, experience in working with target populations, foreign languages, and other communication skills (for example, Braille). VRD continues to provide effective modes of communication for staff, applicants, eligible individuals with disabilities, and its community partners and stakeholders based on individualized needs. Alternative formats include, but are not limited to, American Sign Language interpreters, Spanish interpreters, and AT&T Language Line interpreters for languages such as Vietnamese, Cambodian, Chinese dialects, etc. Also available are

captioning, braille through the VR Braille Unit, large print, reader services, and electronic formatting and screen readers. VRD also recruits bilingual staff for caseloads with high concentrations of customers who speak languages other than English. Some unit management decisions lead to the development of specialty caseloads in which a concentration of customers' needs services requiring additional counselor skills. For example, counselors and RAs who are hired to serve caseloads with a concentration of deaf and hard-of-hearing customers are preferred to have manual communication skills at the time of hire. These counselors and RAs receive ongoing professional development specific to this target population. The professional development plan created for these individuals includes specific skills maintenance or enhancement activities that may be accessed through external training providers, in addition to traditional training opportunities within VRD.

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.

Coordination of Personnel Development under the Individuals with Disabilities Education Act VRD is committed to ensuring that its diverse workforce is highly skilled, professionally trained, and thoroughly prepared to provide the highest quality service to Texans who are blind or visually impaired and/or have other disabilities. Our training curriculum is designed to help staff gain a 21st century understanding of the evolving labor force and the needs of individuals with disabilities, and all procedures and activities related to personnel development described are responsive to WIOA and the amendments made to the Rehabilitation Act of 1973, the Americans with Disabilities Act, and the Individuals with Disabilities Education Act. VRD develops partnerships with high schools, education service centers, and TEA to assist with professional development for personnel who work with students with disabilities. VRD has specialty TVRCs and VRCs who act as liaisons for high schools and partner with the educational system to serve transition-age students seeking assistance to access adult vocational services. Partnering with ISDs allows counselors to use office space on campus to ensure that student customers have access to resources available through the workforce investment system, community, businesses, and other partners necessary to build a network of support. The increase in the number of students with autism, physical and neurodevelopment disabilities, and psychiatric or dual diagnoses reinforces the need to continue best practices components of IDEA. Staff works closely with TEA, centers for independent living, communities, and businesses to achieve collaboration, effective programming, and customer satisfaction. As a result, these efforts improve the effectiveness of VR services for transition customers. Such collaborations take on many different forms in training VRD and educational staff, as well as in impacting families. VRD staff will continue to collaborate with ISDs in the provision of Pre-ETS as specified in WIOA. Additionally, counselors are often invited to education service centers to participate in educator training and to present training, particularly for more effective transition planning for students. VR staff works with schools in creating job fairs that allow students to meet with employers and gather information about the labor market. Family nights are hosted in some areas to invite interested members of the public to VRD offices to share resource

information, discuss service delivery issues, and give input regarding best practices that would better support students and their families. In some areas, community partners such as churches, Workforce Solutions Offices, and community centers assist in providing training to school personnel on understanding cultural diversity in Texas. Training objectives that include sensitivity to cultural issues are integrated in the provision of the principles of ethics in service delivery. Given the cultural diversity within the expanse of Texas, this is an issue often addressed in external conferences with presentations to ensure that staff is sensitive to and aware of the manner in which the VR process is applied. VRD continues to enhance partnerships with TEA, high schools, community colleges, stakeholders, and businesses to leverage relations that better prepare students to transition to postsecondary education and the workforce.

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;

VR Services and Significance of Disability

To be considered as having a significant disability, a VR customer must have serious limitations in one or more functional areas and require multiple VR services over an extended period. Having a most significant disability means that the VR customer must have serious limitations in three or more functional areas (for example, mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) and need significant on-the-job supports for the duration of employment.

As shown in Table 2, Employment Rate for FFY'14-'16 by Severity of Disability, individuals with significant and most significant disabilities have less success in achieving employment with VR services. Formulating strategies aimed at mitigating the impact of disability significance will prove helpful for the next triennium.

Table 2. Employment Rate for FFY'14—'16 by Severity of Disability

SOURCE: DOI's ReHabWorks Closure Aggregates

Disability Significance	Closures	Successful	Employment Rate
No Significant Disability	6,646	5,745	86.4%
Significant Disability	46,125	31,192	67.6%
Most Significant Disability	15,842	9,303	58.7%

Discussion: Supported Employment (SE) Services

Although funds have been expended and service policies expanded, customer and stakeholder feedback gathered during the 2017 CSNA reveals that continued enhancement is needed to maximize the effectiveness of SE services. As Table 4 demonstrates, there is a gap in the employment rate between individuals with and without an SE goal.

Table 4: FFY'14-'16 SE Employment Rate

SOURCE: DOI's ReHabWorks Closure Aggregates

SE Goal? Closures Successful Employment Rate

No 66,605 44,885 67%

Yes 3,607 2,141 59%

However, among students with SE goals, the employment rate is higher, as seen in Table 5.

Table 5: FFY'14-'16 SE Student Employment Rate

SOURCE: DOI's ReHabWorks Closure Aggregates

Student with SE Goal? Closures Successful Employment Rate

No 6,136 3,225 53%

Yes 319 190 60%

To improve employment rates, suggestions include flexibility in opportunities, increases in on-site work experiences, automated systems to assist providers in managing the reporting requirements of the services, and protections for the customer. All are under review for implementation. Continued data tracking will help identify effectiveness in technology or work experience training and may define service options that can be added for enhanced successes. Furthermore, the provision of SE services for customers will undergo an RPI process to identify opportunities for new or enhanced strategies for greater successes. The VR division has executed a memorandum of understanding with the Texas Education Agency (TEA) that includes prohibiting contracts between TEA or local education agencies (LEAs) and employers who pay subminimum wage. Customers already served in subminimum employment receive counseling consistent with Employment First principles and WIOA requirements to encourage meaningful employment in an integrated environment with or without supports.

Finally, the VR division is also launching a capacity-building project for VR and LEA staff to develop skills for practical application through joint training.

For more information, see content in 3.

B. WHO ARE MINORITIES;

VRD employs several strategies to identify underserved populations, including minorities, those with significant, neurodevelopmental disorders (such as autism), psychological disorders (such as bipolar disorder or schizophrenia), and veterans with disabilities.

Outreach to Individuals with Disabilities Who Are Minorities

VRD engages in numerous programs and activities designed to inform and make available VR and supported employment services to minorities and those who have the most significant disabilities. Examples of these activities include:

• required training in language services for individuals with LEP for all VRD staff (this training provides guidance on best practices and specific resources for effectively communicating with our unique population of LEP customers; it also includes web-based instruction and desk references for quick access to information);

• ongoing outreach initiatives with colleges and universities that have historically served African American students;

• collaboration with the Alabama-Coushatta Tribe of East Texas to make services available to Native Americans with disabilities;

• customer access to the Language Line as a resource for those who are not fluent in English;

• VRD staff attendance at community job fairs held for the Hispanic population and meeting with groups, such as the Hispanic Chamber of Commerce, Casa de Amigos, the League of United Latin American Citizens, and Catholic Charities (for example, VRD has targeted outreach activities with Catholic Charities of Lubbock and the Guadalupe-Parkway Neighborhood Centers);

• outreach activities with African American groups such as the local Sickle Cell Anemia Association, Minority Business Alliance, African American Family Conference, and NAACP (for example, the Abilene office has an ongoing relationship with the International Rescue Committee, which works with a high percentage of African refugees);

• collaboration with the American G.I. Forum that targets the needs of Hispanic veterans and has assigned bilingual counselors who have completed the Social Security work incentive training to work with veterans with significant disabilities receiving SSDI benefits and wanting to work;

• counselor participation in training to learn to speak other languages and to learn sign language;

• specialized caseloads for certain disabilities to help develop the expertise needed to most benefit the customers served;

• active recruitment of Spanish-speaking VR counselors;

• development of relationships with local referral sources that serve individuals who are minorities who have the most significant disabilities;

• knowledge of issues impacting minorities is encouraged, including trainings and health summits conducted by the Center for the Elimination of Disproportionality and Disparities, which many staff members have attended; and

• engagement with the faith-based community to educate and inform minority and other allied congregations about VRD services (for example, VRD staff participates in the Texas Annual Conference of the United Methodist Church).

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

Discussion: Meeting the Needs of Underserved Populations

The data collected during the 2017 CSNA revealed that the employment rate for VR participants with significant disabilities changed only within a range of +/- 5 percent during FFY'14-'16. Because individuals with the most significant disabilities have almost one-third less success in employment, more strategic attention dedicated to this population should deliver specific strategies to improve employment rates.

Organizational changes during the VR program's integration with TWC allow greater access to TWC's Labor Market and Career Information (LMCI) department's tools and other TWC resources. These TWC resources will help support informed customer choices and meet employer needs, especially for youth and students with disabilities. The combination of blind and general VR services has positioned the division to make better use of disability-specific expertise to address a continuum of disability severity. Changes to the VR program also promise to maximize counselors' time with customers and allow for the creation of collaborative on-the-job training opportunities for counselors and other field staff. The future of the Texas VR program is customer-centered and needs-conscious, emphasizing access to resources and other employment-related programs at TWC.

The implementation of Rapid Process Improvement (RPI) strategies will benefit the Texas VR program as well. RPI is a management tool based on the Theory of Constraints/Lean Management and provides a methodical approach to engaging staff to quickly identify, map, and improve the processes of an organization. RPI projects are designed to ensure that the division is making the most effective use of service delivery options available for both customers and employers.

For more information, see content in 3.

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

As part of its focus, the 2017 CSNA studied trends that were first identified in the 2014 CSNA and previous CSNA cycles. Goals previously established by the VR program, in coordination with the RCT, remain relevant. The Texas VR program will continue to assess gathered data to consider opportunities and solutions as the newly reorganized TWC VR division matures.

Per the 2017 CSNA, service improvement recommendations include:

• revising paperwork and approval processes for community rehabilitation programs and supported employment customers;

• integrating mobile and other communication technology with VR program operations; and

• increasing customer and staff awareness of other components of the Texas workforce and health care systems.

These recommendations echo perceptions from the 2014 CSNA that VR service delivery, eligibility, and approval processes need refinement.For more information, see content in 3.

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

Discussion: Meeting Pre-ETS Needs

Over the past several years, the number of both eligible students and funds expended has increased. The number of students served increased by close to 10 percent, while funds, per transaction, increased by about 20 percent on average. The data from the 2017 CSNA shows several actions taken to address the needs of students and youth with disabilities.

Both the collected data and the reports recorded in town hall meetings make clear that the need for assistance in accessing meaningful employment persists among students with disabilities. The VR division will continue work on this need and WIOA's programmatic requirements, and continue to develop strategies to enhance progress. The division has established a method to project the number of potentially eligible students needing services, enabling necessary access to the authorized nine services. Regarding the service needs of students in the program, several strategies have been used to enhance service availability for summer activities. TWC is exploring science, technology, engineering, and math (STEM) education activities for students with disabilities using an interdisciplinary and applied approach.

Community college relationships are also proving helpful in coordinating services for students in elective coursework. An interactive website, accessible by smartphone, has also been developed to engage students in considering employment options and testing their knowledge about earnings and the realities of self-support. The website has experienced high volume usage with as many as 110,000 visits per month during the school year and 10,000 visits per summer month. Planning for several other projects is underway for navigation tools in the workforce system, specifically for students. These projects will increase the availability of more year-round paid work experiences and the number of providers for work experience skills trainers.

For more information, see content in 3.

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

• VRD staff works with a network of CRPs across the state, including those that provide disability education, work readiness, and employment services. To increase the competencies of these providers, VRD:

• continues to operate an outcome-based payment system for supported employment and job placement services;

• requires Employment Service Providers (ESP) staff to obtain training and credentialing to ensure that job skills trainers, job placement specialists, supported employment specialists, self-employment, and vocational adjustment trainers have the basic skills necessary to facilitate services so the customer achieves required deliverables as defined in the VR Standards;

• requires each Standards' contractor who provides a service for customers to have a director who is credentialed to oversee staff and compliance;

• continually assesses the need to change or modify CRP services based on the emerging needs of customers and businesses;

• has implemented new Work Experience services to allow customers to participate in volunteer, internship, or paid temporary work settings—these services help customers learn or enhance soft and hard skills in areas of interest and can also help customers validate a potential or planned vocational goal for placement; Work Experience services can also be used for trial work evaluations as a means of providing information necessary to determine eligibility;

• continually explores opportunities to add innovative programs supportive of WIOA Pre-ETS requirements and other services to prepare and support customers in their long-term employment placement;

• continues to review the need for revising the outcome-based payment method for supported employment and job placement to better serve (1) supported self-employment and (2) individuals with autism. In 2014, legacy DARS added the employment premium service to reward providers who maintain training and skills necessary to work with specific populations to increase successful outcomes; the services eligible for the premium are criminal background, wage, professional placement, deaf and hard of hearing, and Autism Spectrum Disorder;

• has implemented the use of transition educator providers. The transition educator service provider is an individual who is not currently a contracted provider; has a master's degree or a bachelor's degree in rehabilitation, counseling and guidance, psychology, education, or a related field; and is or has been an employee of a school system or a Texas education service center within the past fiscal year. These providers were added to better meet the needs of transition age students; and

• requires ESPs to identify strategies for using the naturally occurring work and social supports (including ongoing natural and paid supports) for extended services.

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 .

TO HELP ANTICIPATE AND TARGET PRE-ETS, TWC HAS ALSO OBTAINED PER COUNTY COUNTS OF STUDENTS WITH DISABILITIES WHO ARE UNDER A 504 PLAN OR RECEIVE IDEA SERVICES, CURRENT AS OF 2013-2014, FROM THE US DEPARTMENT OF EDUCATION'S OFFICE OF CIVIL RIGHTS. TWC HAS DEVELOPED STRATEGIES FOR NETWORKING WITH SCHOOL DISTRICTS AND HAS PLANS TO EXTEND STRATEGY DEVELOPMENT FOR OUTREACH TO HOMESCHOOLING COOPERATIVES AND OTHERS TO OFFER PRE-ETS AND GENERAL VR SERVICES EARLIER IN STUDENTS' SECONDARY AND POSTSECONDARY EXPERIENCES.

For more information, please see content below.

The Rehabilitation Act of 1973 requires each state's vocational rehabilitation (VR) agency and state rehabilitation council to jointly conduct the triennial comprehensive statewide needs assessment (CSNA). This requirement has been continued in the Workforce Innovation and Opportunity Act (WIOA), the federal law that reauthorizes VR. Due to noteworthy events that resulted in the substantial restructuring of the VR program during

federal fiscal years (FFY) 2014—2017, the 2017 CSNA was designed to function as a foundational study to prepare for future research. Therefore, minimal reference is made to previous triennial CSNA cycles. CSNA Information Goals Per §101 of the Rehabilitation Act of 1973 (RA73), the 2017 CSNA described the VR service needs of Texas residents with disabilities, particularly the VR service needs of: A. individuals with the most significant disabilities, including their need for supported employment services; B. individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved; C. individuals with disabilities served through other components of the statewide workforce development system; and D. youth with disabilities and students with disabilities, including their need for Pre-ETS or other transition services.

Additional items required of the 2017 CSNA included: i. an assessment of the needs of individuals with disabilities for transition services and pre-employment transition services, and the extent to which such services provided under RA73 are coordinated with transition services provided under the Individuals with Disabilities Education Act (IDEA); ii. an assessment of the need to establish, develop, or improve community rehabilitation programs (CRPs) within the state; iii. a report submitted to the Texas Workforce Commission (TWC) containing information about updates to the aforementioned assessments, for any year in which updates are made; and iv. the process that the state will use to demonstrate that required Pre-ETS are made available to potentially eligible students with disabilities before using any Pre-ETS funding on authorized activities. Methodology The 2017 CSNA includes information from five main sources: 1. An Internet-based needs assessment survey that was contracted with the Public Policy Research Institute at Texas A&M University to gather perspectives from customers, staff, and others 2. Customer satisfaction surveys 3. Data from ReHabWorks (the automated case management system used by the Texas VR program) 4. Five town hall meetings held across Texas in Dallas, El Paso, Houston, McAllen, and San Antonio 5. Ten key informant interviews of VR managers and counselors, including one VR manager from each integrated service area and one from each of the previously separate designated state units (DSUs) for blind and general VR services, one experienced counselor, and one novice counselor. Data Collection and Organizational Challenges Data was gathered from January to October 2017. During this period, the Texas VR program underwent significant organizational change. Based on a mandatory review of all Texas state agencies conducted by the Texas Sunset Commission, the 84th Texas Legislature passed legislation that reorganized the administering agencies of the VR program. The Texas VR program was statutorily transferred from the Texas Health and Human Services Commission (HHSC) to TWC. The VR program transfer was effective September 1, 2016. Additionally, legislation required the combination of the two, separate DSUs in Texas to one DSU. HHSC retained other direct customer service delivery programs, including independent living services, comprehensive rehabilitation services; blind children's services; and the blindness education, screening, and treatment program. The VR program's DSU combination and reorganization process was completed on October 1, 2017. Although there was a hiring freeze during the reorganization period, counselor positions were added to meet customer demand through the realignment of staff positions. In view of these changes, collected data were screened in collaboration with VR staff to distinguish programmatic issues from passing concerns. For each source of data collected, TWC's Division of Operational Insight (DOI) coordinated and worked with the Rehabilitation Council of Texas (RCT) to help prioritize each VR service need that emerged from analysis. The resulting 2017 State Plan goals thus reflect needs identified through consensus-driven

and pragmatic methods. Analysis of Town Hall Meetings Organizational change also created temporary challenges that likely affected the perceptions of customers, staff, and other stakeholders at town hall meetings. For example, some town hall meeting comments addressed concerns about customers' access to information on the combination of the DSUs. Communication and collaboration needs were mentioned 89 times during town hall meetings, whereas employer or staff training needs were mentioned 39 times. Table 1. VR Needs Mentioned during 2017 Town Hall Meetings SOURCE: DOI Town Hall Textual Analysis VR Program or Service Need Number of Mentions Communication/Collaboration 89 Employer/Staff Training 39 Readiness/Work-Based Learning 34 Transportation/Housing 23 PAS & Supported Employment 18 Outreach & Marketing 15 Benefits & Work Incentives 10 Disability-Related Skills 10 Customer Choice 6 Academic/Vocational Training 2 Treatment of Impairments 2 Budgeting 1 Medical/Vocational Assessment 1

A few comments concerned the need for additional VR service providers, especially service providers that offer specialty skills training like orientation and mobility. Other comments expressed dissatisfaction with providers that did not meet expectations of quality and timeliness. These concerns will be addressed as the Texas VR program moves forward to implement the 2017 State Plan goal. Cultivating good working relationships between TWC's VR division and external service providers is a top priority. It is important for the VR division to have a strong provider base to deliver needed services to customers. It is also important for the VR division to identify providers that have a record of success. Learning how to leverage TWC's expansive information and tool sets will play a vital role in developing and expanding services for customers, as well as resolving short- and long-term challenges. Themes of the 2017 CSNA Demographics of Disability in Texas When data collection for the 2017 CSNA began (January 2017), there were about 3,030,000 Texans with disabilities, approximately 12 percent of the state's population. Of that 12 percent, 50 percent were male, 50 percent were female, 32 percent identified as Hispanic or Latino, and 24 percent identified as belonging to a minority racial group. The approximately 235,000 VR participants served during FFY'14—16 generally mirrored these demographics. However, 45 percent of VR participants were female, reflecting the state's current labor force. At present, 66 percent of participants in the VR program achieve employment at VR case closure. Identified Vocational Rehabilitation Service Needs As part of its focus, the 2017 CSNA studied trends that were first identified in the 2014 CSNA and previous CSNA cycles. Goals previously established by the VR program, in coordination with the RCT, remain relevant. The Texas VR program will continue to assess gathered data to consider opportunities and solutions as the newly reorganized TWC VR division matures. Per the 2017 CSNA, service improvement recommendations include: • revising paperwork and approval processes for community rehabilitation programs and supported employment customers; • integrating mobile and other communication technology with VR program operations; and • increasing customer and staff awareness of other components of the Texas workforce and health care systems. These recommendations echo perceptions from the 2014 CSNA that VR service delivery, eligibility, and approval processes need refinement. Underserved Populations Possibly underserved populations and needs include: • individuals who are 55 years or older and unemployed at application, especially in view of the increasing number of seniors seeking work; • individuals who need supported employment to seek first jobs, or those who are pursuing advancement; • individuals with neurodevelopmental disabilities, such as autism, or psychosocial disabilities, such as

borderline personality disorder, who need more counselors and staff trained for constructive interaction with these individuals; • students who need Pre-ETS and other transition services, especially in rural or economically disadvantaged school districts; • veterans who need information on TWC services and greater community outreach to recruit as VR customers; and • visually impaired individuals, who need more blind services providers and independent living services that support vocational goals. VR Services and Significance of Disability To be considered as having a significant disability, a VR customer must have serious limitations in one or more functional areas and require multiple VR services over an extended period. Having a most significant disability means that the VR customer must have serious limitations in three or more functional areas (for example, mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) and need significant on-the-job supports for the duration of employment. As shown in Table 2, Employment Rate for FFY'14—'16 by Severity of Disability, individuals with significant and most significant disabilities have less success in achieving employment with VR services. Formulating strategies aimed at mitigating the impact of disability significance will prove helpful for the next triennium. Table 2. Employment Rate for FFY'14—'16 by Severity of Disability SOURCE: DOI's ReHabWorks Closure Aggregates Disability Significance Closures Successful Employment Rate No Significant Disability 6,646 5,745 86.4% Significant Disability 46,125 31,192 67.6% Most Significant Disability 15,842 9,303 58.7%

Meeting 2014 CSNA Goals and Addressing 2017 CSNA Goals Goal Area 1: Target Populations Priority 1 Improve customer employment outcomes for individuals with significant disabilities, including individuals who are blind or have significant visual impairments, individuals who are from minority backgrounds, individuals with neurodevelopmental disorders (including autism, intellectual disabilities, and learning disabilities), individuals with mental health disorders, and veterans with disabilities. Discussion: Meeting the Needs of Underserved Populations The data collected during the 2017 CSNA revealed that the employment rate for VR participants with significant disabilities changed only within a range of +/- 5 percent during FFY'14—'16. Because individuals with the most significant disabilities have almost one-third less success in employment, more strategic attention dedicated to this population should deliver specific strategies to improve employment rates. Organizational changes during the VR program's integration with TWC allow greater access to TWC's Labor Market and Career Information (LMCI) department's tools and other TWC resources. These TWC resources will help support informed customer choices and meet employer needs, especially for youth and students with disabilities. The combination of blind and general VR services has positioned the division to make better use of disability-specific expertise to address a continuum of disability severity. Changes to the VR program also promise to maximize counselors' time with customers and allow for the creation of collaborative on-the-job training opportunities for counselors and other field staff. The future of the Texas VR program is customer-centered and needs-conscious, emphasizing access to resources and other employment-related programs at TWC. The implementation of Rapid Process Improvement (RPI) strategies will benefit the Texas VR program as well. RPI is a management tool based on the Theory of Constraints/Lean Management and provides a methodical approach to engaging staff to quickly identify, map, and improve the processes of an organization. RPI projects are designed to ensure that the division is making the most effective use of service delivery options available for both customers and employers. Priority 2 Increase counselors' knowledge of work incentives and the effect of

earnings on SSI/SSDI. This will improve the quality of VR's provision of counseling on decisions that impact employment. Discussion: Improving Knowledge Bases Interestingly, the data in the VR needs survey and Town Hall meetings for the 2017 CSNA indicate that staff, stakeholders, and customers have differing beliefs about work incentives and other benefits, their value, and application in the vocational counseling process. While respondents agree that a loss of benefits, along with lack of affordable child care, housing, and transportation are barriers to success, staff and stakeholders are more likely than customers to express concern for loss of benefits as a barrier. This could indicate several different beliefs. Applying a short-term problem-solving counseling methodology regarding child care, housing, and transportation may provide better information on a customer's benefits and concerns while also addressing barriers to success. Continued tracking of financial beneficiary data, by type of beneficiary, as introduced in Table 3 below, will assist the VR division and the RCT in developing the specific extent of customer service needs among recipients of financial benefits. Financial benefits are defined as follows: • General assistance: cash assistance to dependent needy children and disabled adults who are not eligible for assistance under other cash assistance programs. • Social Security Disability Insurance (SSD or SSDI), a payroll tax-funded, federal insurance program of the US government. • SSI Aged: Supplemental Security Income (SSI), a government program that provides stipends to low-income individuals who are either aged 65 or older, blind, or disabled. • SSI: Supplemental Security Income. • TANF: Temporary Assistance for Needy Families, a federal assistance program since 1997. • Unemployment insurance (UI) benefits: a small source of income for workers who have lost their jobs through no fault of their own. • Workers compensation: a form of insurance required from employers that provides money as compensation for workers who are injured at work or contract an occupational disease. Employment rates for customers who are financial beneficiaries vary from a low of 36 percent employment rate to a high of 71 percent, versus the population that does not receive any type of financial benefit, employed at 74 percent. An ongoing analysis of the complexities of different beneficiary needs and regional variations will provide valuable insight. Table 3: FFY'14—'16 VR Employment Rate by Financial Benefits Received by the Customer SOURCE: DOI's ReHabWorks Closure Aggregates Financial Benefits Received Closures Successful Employment Rate Workers Compensation 383 137 36% UI 532 221 42% SSI 9,673 4,778 49% General Assistance 2,227 1,210 54% SSDI 11,000 6,053 55% TANF 1,035 569 55% Other Public Support 3,958 2,579 65% SSI Aged 1,252 885 71% No Financial Benefit 43,966 32,396 74%

Other knowledge barriers to employment include employer perceptions or lack of understanding or awareness of disabling conditions and individual needs in relation to disability. The TWC VR division will focus on these topics, using TWC's relationships with employers, to enhance services and provide information and training for employers. Priority 3 Provide a customer service delivery system that makes information available on options for services, providers, careers, and other areas, to enable informed customer choice and the delivery of quality and timely services. Discussion: Developing the Service Delivery System The development of the customer service delivery system is ongoing. Data regarding all WIOA changes is being gathered, and changes related to the combination and integration of the two DSUs are being finalized. Further analyses of internal and external data will guide the development of strategies for making best use of LMCI tools and resources. The VR needs survey conducted by Texas A&M demonstrated that developing new strategies in this area will prove helpful; 29 percent of survey respondents indicated

that they had no knowledge of LMCI tools. Staff will engage in further training to apply LMCI information in support of informed customer choice and timely delivery of quality services through access and application of relevant decision-making information. As the reorganized VR division continues to mature, other strategies may be addressed to identify or create systems to use LMCI tools with providers for better vocational counseling and augmented information for the provider base. Concerning the provider base, in cities, VR participants reported that public transportation is often unreliable, while in rural areas, public transportation is often nonexistent. It was suggested that ride sharing, nonprofit transportation charities, and family and friends can supplement the capabilities of public transportation. Concerning affordable child care, which was also identified as a barrier to employment, TWC administers the Child Care Development Block Grant. There is a need to further explore how VR customers can access these services during the rehabilitation process. There is also a need to further investigate the geographical distribution of service providers, especially employment service providers. While regional imbalances in provider to customer ratios do not yet seem to have affected employment rates, the VR program is dedicated to developing a larger base of service providers in Texas' most populated counties. Customer saturation rates of individual providers and provider types are also an item of interest. The limited availability of certain types of service providers, in some areas, can pose challenges. For example, assistive technology providers and other specialty service providers must often travel from urban areas. Through the reorganization of the VR program and the combination of DSUs and creation of a common policy manual, great strides have been made to broaden the enrollment contract process and increase providers across the state. As required by Senate Bill 20, 84th Texas Legislature, Regular Session (2015), VR has made efforts to improve contracting practices. However, there is more work to be done to relieve providers of intensive paperwork and documentation processes while allowing more flexibility to achieve customers' employment goals in meaningful and integrated settings. Customers value VR services and largely report that services are meeting their employment needs. Up to 78 percent of respondents indicated that they were satisfied or very satisfied with the quality of VR services from VR staff, their inclusion by VR staff in setting goals and making choices, the courteousness and respectfulness of VR staff, and the VR eligibility determination process. For the quality of services from VR service providers, views of respondents were slightly lower, at 68 percent. Goal Area 2: Services to Students and Youth with Disabilities Priority 1 Expand and improve vocational rehabilitation services, including pre-employment transition services (Pre-ETS) for students with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities. Discussion: Meeting Pre-ETS Needs Over the past several years, the number of both eligible students and funds expended has increased. The number of students served increased by close to 10 percent, while funds, per transaction, increased by about 20 percent on average. The data from the 2017 CSNA shows several actions taken to address the needs of students and youth with disabilities. Both the collected data and the reports recorded in town hall meetings make clear that the need for assistance in accessing meaningful employment persists among students with disabilities. The VR division will continue work on this need and WIOA's programmatic requirements, and continue to develop strategies to enhance progress. The division has established a method to project the number of potentially eligible students needing services, enabling necessary access to the authorized nine services. Regarding the service needs of students in

the program, several strategies have been used to enhance service availability for summer activities. TWC is exploring science, technology, engineering, and math (STEM) education activities for students with disabilities using an interdisciplinary and applied approach. Community college relationships are also proving helpful in coordinating services for students in elective coursework. An interactive website, accessible by smartphone, has also been developed to engage students in considering employment options and testing their knowledge about earnings and the realities of self-support. The website has experienced high volume usage with as many as 110,000 visits per month during the school year and 10,000 visits per summer month. Planning for several other projects is underway for navigation tools in the workforce system, specifically for students. These projects will increase the availability of more year-round paid work experiences and the number of providers for work experience skills trainers. Priority 2 Provide supported employment services to youth and other individuals with the most significant disabilities who require extended support to achieve and maintain an employment outcome. Discussion: Supported Employment (SE) Services Although funds have been expended and service policies expanded, customer and stakeholder feedback gathered during the 2017 CSNA reveals that continued enhancement is needed to maximize the effectiveness of SE services. As Table 4 demonstrates, there is a gap in the employment rate between individuals with and without an SE goal. Table 4: FFY'14—'16 SE Employment Rate SOURCE: DOI's ReHabWorks Closure Aggregates SE Goal? Closures Successful Employment Rate No 66,605 44,885 67% Yes 3,607 2,141 59%

However, among students with SE goals, the employment rate is higher, as seen in Table 5. Table 5: FFY'14—'16 SE Student Employment Rate SOURCE: DOI's ReHabWorks Closure Aggregates Student with SE Goal? Closures Successful Employment Rate No 6,136 3,225 53% Yes 319 190 60%

To improve employment rates, suggestions include flexibility in opportunities, increases in on-site work experiences, automated systems to assist providers in managing the reporting requirements of the services, and protections for the customer. All are under review for implementation. Continued data tracking will help identify effectiveness in technology or work experience training and may define service options that can be added for enhanced successes. Furthermore, the provision of SE services for customers will undergo an RPI process to identify opportunities for new or enhanced strategies for greater successes. The VR division has executed a memorandum of understanding with the Texas Education Agency (TEA) that includes prohibiting contracts between TEA or local education agencies (LEAs) and employers who pay subminimum wage. Customers already served in subminimum employment receive counseling consistent with Employment First principles and WIOA requirements to encourage meaningful employment in an integrated environment with or without supports. Finally, the VR division is also launching a capacity-building project for VR and LEA staff to develop skills for practical application through joint training. Projecting Potentially Eligible Students for Pre-employment Transition Services For required and coordinated pre-employment transition services (Pre-ETS), the Texas VR program has developed a method to project future expenditures. TWC will project Pre-ETS for expenditures during the first quarter of each fiscal year as follows: 1. Add previous FFY total spending on required and coordinated services 2. Divide by the previous FFY's number of Pre-ETS customers 3. Multiply by the number of anticipated Pre-ETS customers for the current FFY; then 4. Subtract the result from the VR award's set-aside fund to determine the

amount of money available to spend on authorized Pre-ETS for the current FFY At the end of each fiscal year, TWC will reconcile the projections with actual expenditures and make appropriate adjustments, when necessary. The VR program will continue to update estimates of potentially eligible students with disabilities in collaboration with TEA and the US Department of Education's Office of Civil Rights. Goal Area 3: Partnerships Priority 1 Enhance collaboration and coordination with Boards, employers, and other stakeholders to increase competitive integrated employment outcomes and work-based learning experiences, which may include in-school or after-school opportunities such as internships, volunteer positions, and summer and year-round work experience programs. Discussion: Strengthening Relationships with Collaborators With VR's merger into TWC, the agency has entered into data agreements with other federal and state agencies, including Veterans Affairs (VA). These agreements will help forge the way for programmatic collaboration and customer coordination for available services and resources. Working with the VA has resulted in an increased number of veterans who are served by the public VR program in collaboration with their VA counselors. To help anticipate and target Pre-ETS, TWC has also obtained per county counts of students with disabilities who are under a 504 Plan or receive IDEA services, current as of 2013—2014, from the US Department of Education's Office of Civil Rights. TWC has developed strategies for networking with school districts and has plans to extend strategy development for outreach to homeschooling cooperatives and others to offer Pre-ETS and general VR services earlier in students' secondary and postsecondary experiences. Additionally, the VR division has worked with numerous employers to provide training and assessment to assist in developing employer partnerships with large and small employers to expand the community of employers familiar with hiring individuals with disabilities to meet their workforce needs. The division continues to work with the National Employment Team to facilitate employer relationships at the national level. Feedback and data gathered in the needs assessment for the 2017 CSNA encourage opportunities for additional and enhanced collaboration that have come about through some of the programmatic changes which moved other support programs HHSC. For example, HHSC outsourced the Independent Living program in Texas to the Centers for Independent Living. Meanwhile, the Independent Living Services for Older Individuals Who Are Blind (ILS-OIB) program has been retained in TWC with VR. As a result, formal referral processes and policies have been developed to expand the network of providers available for referral of those individuals needing independent living services and to increase the referral to VR of individuals who may benefit from ILS-OIB services. In one year, FFY'17, the VR division served 1,780 new customers in the ILS-OIB program following the program's redesign. Similarly, the Comprehensive Rehabilitation Services program, which serves individuals with traumatic spinal cord or brain injury, and the Blind Children's Vocational Discovery and Development program also remained in HHSC, which presents further opportunities to collaborate to provide referrals and receive referrals when those customers are ready for VR. Other collaboration with LEAs, higher education, and Boards has resulted in customer access to post—high school scenarios that provide training and employment in meaningful and higher-paying jobs. Texas will continue to focus on developing and enhancing partnerships and broad collaboration, not only because of its strong emphasis in WIOA, but also because it ultimately results in a more responsive and effective service delivery system for VR customers. Following additional review of data and consideration of additional strategies in coordination with RCT, the full CSNA report will be completed in spring 2018. The VR service needs identified by the report will guide TWC's

VR division in programmatic improvements and enhancements for meaningful employment outcomes for customers, and strategies to better leverage relationships with employers and collaboration with partners.

K. ANNUAL ESTIMATES

Describe:

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

The 2014 Disability Status Report published by the Cornell University Employment and Disability Institute estimates the percentage of noninstitutionalized working-age (ages 16 to 64) Texans with disabilities, using data from the 2014 American Community Survey, at 9.7 percent of the total population of 26.9 million, or 2,609,300 individuals potentially eligible for services. VRD anticipates the number of individuals applying for VR services will gradually increase in 2018—2019. The following table shows the actual number of VR applications for FFY'16—17, and projections for FFY'18—19. The projected trend in applications is attributable to a continued effort by VRD to increase outreach, referrals, and partnerships with other state agencies. Table 1: Actual and Projected Applications for VR Services FFY'16—19 Year Number of Applications Percent Change from Prior Year Number of Customers Determined Eligible Percent Change from Prior Year 2016 42,736 5.20% 35,908 5.22% 2017 35,773 -16.29% 30,827 -14.15% 2018 36,667 2.50% 31,598 2.50% 2019 37,584 2.50% 32,388 2.50%

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

A. THE VR PROGRAM;

The following table shows the actual number of eligible VR customers served FFY'16—17, and projections for FFY'18—19. "Customers served" for this purpose is defined as customers receiving purchased or staff-provided services. Customers who have "supported employment" marked "yes" on their IPE are classified as Title VI; otherwise they are classified as Title I. Table 2: Actual and Projected Number of Eligible VR Customers Served by Title I and VI Funds FFY'16—'19 Year Program Number Served Percent Change from Prior Year 2016 Vocational Rehabilitation - Title I 82,053 2017 Vocational Rehabilitation - Title I 82,352 0.36% 2018 Vocational Rehabilitation - Title I 82,652 0.36% 2019 Vocational Rehabilitation - Title I 82,953 0.36% 2016 Supported Employment - Title VI 8,811 --- 2017 Supported Employment - Title VI 8,602 -2.37% 2018 Supported Employment - Title VI 8,633 0.36% 2019 Supported Employment - Title VI 8,665 0.36%

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

The following table shows the actual number of eligible VR customers served FFY'16—17, and projections for FFY'18—19. "Customers served" for this purpose is defined as customers receiving purchased or staff-provided services. Customers who have "supported employment" marked "yes" on their IPE are classified as Title VI; otherwise they are classified as Title I. Table 2: Actual and Projected Number of Eligible VR Customers Served by Title I and VI Funds FFY'16—'19 Year Program Number Served Percent Change from Prior Year 2016 Vocational Rehabilitation - Title I 82,053 2017 Vocational Rehabilitation - Title I 82,352 0.36% 2018 Vocational Rehabilitation - Title I 82,652 0.36% 2019 Vocational

Rehabilitation - Title I 82,953 0.36% 2016 Supported Employment - Title VI 8,811 --- 2017 Supported Employment - Title VI 8,602 -2.37% 2018 Supported Employment - Title VI 8,633 0.36% 2019 Supported Employment - Title VI 8,665 0.36%

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

Texas is 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

Texas is not under an order of selection.

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

While VRD does not anticipate a significant change in the average cost of services in the immediate future, the costs associated with some services (for example, hearing aids, psychological testing, and interpreter services) are continuing to increase and could drive the overall average costs of typical VR services higher. This average considers the total costs for all cases during the federal fiscal year. The following chart details the estimated funds for purchased services and customers whom VR serves. “Customers served” for this purpose is defined as customers with a purchased service during the fiscal year in order to more accurately represent average and total cost. Estimates are based on a number of factors, including: • a review of the number of individuals applying for VR services in previous years; • a review of the number of eligible individuals served in previous years; • the anticipated population growth in Texas; and • other variables that may impact the number of eligible individuals in the state.

Table 3: Estimated Caseloads and Costs (FFY’18—19) Year Program Estimated Number to be Served Average Cost of Services Estimated Total Funds 2018 Vocational Rehabilitation - Title I 60,749 $2,440 $148,211,373 2019 Vocational Rehabilitation - Title I 61,530 $2,440 $150,117,552 2018 Supported Employment - Title VI 832 $ 1,843 $ 1,533,376 2019 Supported Employment - Title VI 835 $ 1,843 $ 1,538,905

Assuming current trends continue, VRD believes there are funds available to serve all individuals currently eligible for VR services and individuals in plan status. VRD anticipates having the necessary funds to cover the cost of expected eligibility determinations and planned services. Factors that could change the VRD estimates include: • changes in federal and state appropriations; and • changes in state statutes. Should further information become available about the impacts of these changes on VR programs, projections will be updated.

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.

TWC VRD and RCT collaborated to establish goals and priorities to advance the continued provision of high-quality VR services to eligible customers. Both agree that the following priorities are critical to the successful accomplishment of these goals: • Enhance the quality and scope of services through appropriate coordination with other agencies and organizations; and • Maximize funding for the program by identifying and using available comparable services and benefits.

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

Goal Area 1: Target Populations Priorities: • Improve customer employment outcomes for individuals with significant disabilities to include individuals who are blind or significantly visually impaired, individuals who are from minority backgrounds, individuals with neurodevelopmental disorders (including autism, intellectual disabilities, and learning disabilities), individuals with mental health disorders, and veterans with disabilities. • Increase counselors' knowledge of work incentives and the effect of earnings on Social Security Disability Insurance and Supplemental Security Income to improve counselors' provision of vocational counseling on decisions impacting employment. • Provide a customer service delivery system that makes information available to customers on their options for services, providers, careers, and other areas, to (1) enable informed customer choice and (2) deliver quality and timely services. Goal Area 2: Services to Students and Youth with Disabilities Priorities • Expand and improve vocational rehabilitation services, including Pre-ETS for students with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities. • Provide supported employment services to youth and other individuals with the most significant disabilities who require extended support in order to achieve and maintain an employment outcome. Goal Area 3: Partnerships Priorities: • Enhance collaboration and coordination with Boards, employers, and other stakeholders to increase competitive integrated employment outcomes and work-based learning experiences, which may include in-school or after-school opportunities such as internships, volunteer positions, and summer and year-round work experience programs.

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

See content in A. The most recent comprehensive statewide assessment, including any updates; B. the State's performance under the performance accountability measures of section 116 of WIOA; and C. other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

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

Data from the FFY'17 CSNA were used to establish VRD goals and priorities. Trends identified in the full 2014 CSNA and the limited-scope 2015 CSNA (which focused on youth and students with disabilities) continue to be relevant, based on 2017 CSNA findings. The priorities associated with each Goal Area articulated above, as previously established by the VR program in coordination with RCT, continue to be relevant. Refer to Combined State Plan, Section 10, Statewide Needs Assessment for a more detailed discussion of 2017 CSNA findings pertaining to the identified Goal Areas and the priorities associated with each.

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

The U.S. Departments of Labor and Education acknowledge that due to insufficient historical data to establish levels of performance and targets, they will use a phased-in approach to set levels of performance. Therefore, it is not possible at this time to project VRD performance on the new WIOA performance accountability measures. For Program Year 2016 (PY'16) and PY'17, the Rehabilitation Services Administration (RSA) has authorized VR nationwide to develop baseline statistics from which future projections can be made. As a result of these considerations, the historical standards and indicators are included in this plan to evaluate past performance, and as a proxy for performance accountability measures for purposes of this plan. VRD will use the combined performance and accountability measures with negotiated targets in future years covered by this plan.

C. OTHER AVAILABLE INFORMATION ON THE OPERATION AND EFFECTIVENESS OF THE VR PROGRAM, INCLUDING ANY REPORTS RECEIVED FROM THE STATE REHABILITATION COUNCIL AND FINDINGS AND RECOMMENDATIONS FROM MONITORING ACTIVITIES CONDUCTED UNDER SECTION 107.

Information obtained from the following sources was used to establish VRD's goals and priorities: • WIOA Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions Final Rule published August 19, 2016; • RCT Annual Report; • Texas Workforce Investment Council plan; • State and Legislative Budget Board measures; • Reports to RCT on the DSU's progress in implementing strategies and priorities in the VR state plan, etc.; • Legacy DARS performance on RSA Evaluation Standards and Performance Indicators; and • Input from customers, advocacy organizations, and providers.

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.

Texas is not in an order of selection.

B. THE JUSTIFICATION FOR THE ORDER.

Texas is not in an order of selection.

C. THE SERVICE AND OUTCOME GOALS.

Texas is not in an order of selection.

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

Texas is not in an order of selection.

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

Texas is not 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.

Texas is not 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.

TWC's Vocational Rehabilitation Division (VRD) provides supported employment services for customers with the most significant disabilities, including youth with the most significant disabilities. Funds received under Title VI, Part B §622 (also known as the supported employment program) of the Rehabilitation Act of 1973, as amended are used to serve these individuals. VR customers with the most significant disabilities may have multiple disabilities or functional limitations that result in the requirement for extended support services essential to retaining competitive integrated employment. Texas' provision of supported employment services is integral to the state's overall plan to provide services that result in competitive integrated employment outcomes for VRD customers. Goal Area 1: Target Populations The goals for Goal Area 1 are as follows: • Improve customer employment outcomes for individuals with significant disabilities, including but not limited to individuals who are blind or significantly visually impaired; individuals who are from minority backgrounds; individuals with neurodevelopmental disorders (including autism, intellectual disabilities and learning disabilities); individuals with mental health disorders; and veterans with disabilities. • Increase counselors' knowledge of work incentives and the effect of earnings on Social Security Disability Insurance and Supplemental Security Income to improve counselors' ability to provide vocational counseling on decisions impacting employment. • Provide a customer service delivery system that makes information available to customers on their options for services, providers, careers, and other areas, to enable them to make informed choices and to provide them with quality services that are delivered in a timely manner. Goal Area 2: Services to Students and Youth with Disabilities The goals for Goal Area 2 are as follows: • Expand and improve vocational rehabilitation services, Pre-ETS for students with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities. • Provide supported employment services for youth and other individuals with the most significant disabilities who require

extended support to achieve and maintain employment. Goal Area 3: Partnerships The goal for Goal Area 3 is to enhance collaboration and coordination with local workforce development boards, employers, and other stakeholders to increase competitive integrated employment outcomes and work-based learning experiences, which may include in-school or after-school opportunities such as internships, volunteer positions, and summer and year-round work experience programs. In addition to the above goals, priorities for funds received under the Rehabilitation Act §603 are to increase the number of customers receiving supported employment services who achieve employment outcomes and the number of supported employment services providers statewide, and maintain the number of customers receiving supported employment services within their home communities. Funding WIOA §110 funding is available statewide to VR counselors to serve Texans with the most significant disabilities. Services leading to supported employment are integrated into the VR service delivery system. At case closure, or at the conclusion of any time-limited post-employment services, the services paid for by §110 funds are concluded. Extended services and support may be necessary to maintain the employment outcome after a customer's case has been closed. Extended services and support involve either on- or off-site monitoring (as requested by the customer or legal representative) for as long as needed to ensure the customer's job stability. Extended services and support are provided and funded by sources other than VRD and may include the employer. Both natural supports and paid supports, including long-term supports and services provided by other state and federal programs, can be used to facilitate extended services. Extended services can be provided for up to four years or until individual turns 25 years of age; extended services for individuals 25 or older are not available for four years. Supported employment services last 24 months unless there is management approval to provide services for a longer period. Timing of Transition to Extended Services Extended services are provided to the VR customer when he or she reaches job stability, defined as: • performing in a competitive, integrated job to the employer's satisfaction; • satisfied with the job placement; • having the necessary modifications and accommodations at the worksite; • having reliable transportation to and from work; and • having extended services and support needs in place. As customers progress through the supported employment process, VRD uses naturally occurring work supports as extended services. As appropriate, paid support is administered through other state agencies or community resources not funded by VRD. Documentation requirements for supported employment services require the CRP to identify strategies for using the naturally occurring work or social supports (including ongoing natural and paid supports) for extended services. A customer's extended services are identified and documented in the customer's Individualized Plan for Employment. VRD providers do not provide services to customers during the 90-day period between "Job Stability" and "Service Closure." If VRD providers do provide direct services to a customer during this period, job stability ends and is not reestablished until at least 30 days after the direct services or job change has occurred. A VRD-supported employment case is closed after a customer successfully maintains job stability for 90 days, with extended services being provided only by non—vocational rehabilitation resources. VRD identifies and makes arrangements, including entering into cooperative agreements, with other state agencies and other appropriate entities to assist in the provision of supported employment services. VRD coordinates with other public or non-profit agencies or organizations within the state, employers, natural supports, and other entities with respect to the provision of extended services. Collaboration with community organizations and other state agencies, to identify,

develop, and implement cooperative agreements and partnerships, is essential to achieving successful employment outcomes for customers, particularly those with the most significant disabilities. Other Funding Sources Potential funding sources include the Social Security Administration's Ticket to Work Program, DSHS, the state mental health agency, CILs, Medicaid/CHIP—the administrative authority for all Medicaid waivers and state plan services. Additionally, HHSC, the intellectual and developmental disabilities state agency, is a potential funding source and is the operating authority for the following: • The majority of 1915(c) state Home and Community-based Services (HCS) Medicaid waivers; • 1915(k) Community First Choice; • Title XX community services; and • Employment services provided through state general revenue funds.

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

WIOA §110 funding is available statewide to VR counselors to serve Texans with the most significant disabilities. Services leading to supported employment are integrated into the VR service delivery system. At case closure, or at the conclusion of any time-limited post-employment services, the services paid for by §110 funds are concluded. Extended services and support may be necessary to maintain the employment outcome after a customer's case has been closed. Extended services and support involve either on- or off-site monitoring (as requested by the customer or legal representative) for as long as needed to ensure the customer's job stability. Extended services and support are provided and funded by sources other than VRD and may include the employer. Both natural supports and paid supports, including long-term supports and services provided by other state and federal programs, can be used to facilitate extended services. Extended services can be provided for up to four years or until individual turns 25 years of age; extended services for individuals 25 or older are not available for four years. Supported employment services last 24 months unless there is management approval to provide services for a longer period.

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.

Potential funding sources include the Social Security Administration's Ticket to Work Program, DSHS, the state mental health agency, CILs, Medicaid/CHIP—the administrative authority for all Medicaid waivers and state plan services. Additionally, HHSC, the intellectual and developmental disabilities state agency, is a potential funding source and is the operating authority for the following: • The majority of 1915(c) state Home and Community-based Services (HCS) Medicaid waivers; • 1915(k) Community First Choice; • Title XX community services; and • Employment services provided through state general revenue funds.

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.

To expand and improve services to all individuals with disabilities, VRD will: • increase coordination with mental health organizations, local school districts, postsecondary education institutions, and HHSC's Office of Mental Health Coordination; • build staff capacity and expertise by using internal and external subject matter experts to provide training to counselors working in specialized areas including autism • continue to refine the VRD quality assurance process, and quality improvement program, to evaluate and monitor performance; and • increase VRD use of labor market and career information and data available for identifying target occupations and placement and/or advancement opportunities for program participants.

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.

A broad range of assistive technology services and devices may be provided at each stage of the rehabilitation process. During FFY'16—17, funds were reserved and used for Innovation and Expansion (I&E) activities to implement strategies. Assistive technology services and tools are parts of a technology-based approach used to maintain, increase, or improve the functional capabilities of individuals with disabilities as part of the rehabilitation process. It is a primary goal of VRD to expand the knowledge, access, and use of assistive technology for all customers, staff, employers, and community partners. Examples of VRD strategies include: • consultation on and assistance with vehicle modifications, work place modifications, and residential modifications; • research regarding new and emerging technologies; and • exploring ways in which assistive technology can be more efficiently applied as a part of VR services to students with disabilities and VRD services to employers. Assistive technology from the University of Texas' Texas Technology Access Program (TTAP) is a viable resource for customers. This program has updated equipment, and VRD will enhance its partnership with the University of Texas' TTAP. VRD will be entering into an MOA with TTAP, the implementing entity designated by the state governor under the Assistive Technology Act of 1998 §4 (29 U.S.C. 3003), to coordinate activities, including the referral of individuals with disabilities. Currently VRD refers customers to TTAP demonstration centers located throughout the state to ensure that customers have an informed choice of assistive technology. VRD participates in annual joint presentations with TTAP at Ability Expo in Houston and TWC's statewide conference, which provides opportunities for customers to learn about new adaptive equipment and assistive technology that can assist them in maintaining competitive integrated employment. In FY'13, legacy DARS assembled and provided each of the five regions with an assistive technology kit that contained the technology most frequently requested by VR customers. In May 2016, updated assistive technology kits were provided to each of the regions. The kits

included items such as iPads, Live Scribe Smart Pens, Adesso Bluetooth Mini Keyboard, etc. The Regional Assistive Technology Toolkits enable customers to use a "try it before you buy it" approach to help validate the appropriateness of the assistive solution; and to ensure customers' satisfaction with a device and need for training on use of the technology. The assistive technology needs of VR customers are assessed on an individual basis. When assistive technology needs are identified, counselors consult with the state office program specialist for assistive technology to determine the available assistive technology options that can meet the customers' needs to reduce impediments to employment and training. Additionally, VRD contracts with private vendors to provide assistive technology evaluations. Through these evaluations, customers and counselors are presented with assistive technology options that can best meet the customers' needs. VRD is expanding staff capacity in assistive technology by training regional teams to become subject matter experts in assistive technology. Additionally, each unit has an assistive technology specialist to assist counselors in determining the assistive technology needs of their customers. By having more assistive technology subject matter experts, VRD will ensure appropriate equipment is loaned to customers and/or purchased.

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.

VRD employs several strategies to identify underserved populations, including minorities, those with significant, neurodevelopmental disorders (such as autism), psychological disorders (such as bipolar disorder or schizophrenia), and veterans with disabilities. Outreach to Individuals with Disabilities Who Are Minorities VRD engages in numerous programs and activities designed to inform and make available VR and supported employment services to minorities and those who have the most significant disabilities. Examples of these activities include: • required training in language services for individuals with LEP for all VRD staff (this training provides guidance on best practices and specific resources for effectively communicating with our unique population of LEP customers; it also includes web-based instruction and desk references for quick access to information); • ongoing outreach initiatives with colleges and universities that have historically served African American students; • collaboration with the Alabama-Coushatta Tribe of East Texas to make services available to Native Americans with disabilities; • customer access to the Language Line as a resource for those who are not fluent in English; • VRD staff attendance at community job fairs held for the Hispanic population and meeting with groups, such as the Hispanic Chamber of Commerce, Casa de Amigos, the League of United Latin American Citizens, and Catholic Charities (for example, VRD has targeted outreach activities with Catholic Charities of Lubbock and the Guadalupe-Parkway Neighborhood Centers); • outreach activities with African American groups such as the local Sickle Cell Anemia Association, Minority Business Alliance, African American Family Conference, and NAACP (for example, the Abilene office has an ongoing relationship with the International Rescue Committee, which works with a high percentage of African refugees); • collaboration with the American G.I. Forum that targets the needs of Hispanic veterans and has assigned bilingual counselors who have completed the Social Security work incentive training to work with veterans with significant disabilities receiving SSDI benefits and wanting to work; • counselor participation in training to learn to speak other languages and to learn

sign language; • specialized caseloads for certain disabilities to help develop the expertise needed to most benefit the customers served; • active recruitment of Spanish-speaking VR counselors; • development of relationships with local referral sources that serve individuals who are minorities who have the most significant disabilities; • knowledge of issues impacting minorities is encouraged, including trainings and health summits conducted by the Center for the Elimination of Disproportionality and Disparities, which many staff members have attended; and • engagement with the faith-based community to educate and inform minority and other allied congregations about VRD services (for example, VRD staff participates in the Texas Annual Conference of the United Methodist Church). Outreach to Serve Individuals with Disabilities Who Have Been Unserved or Underserved by Vocational Rehabilitation Texas veterans with disabilities are an underserved VR customer group. To better serve this population of customers, VRD will increase VR services to veterans with disabilities and improve coordination with other federal and state entities providing veterans' services by: • evaluating policies, procedures, and rules specific to veterans to provide seamless and efficient access to services for veterans with disabilities; • ensuring staff is aware of the existing MOU between legacy DARS and the U.S. Department of Veterans Affairs, which details the referral process between the two entities and coordination of services on behalf of eligible veterans; • enhancing coordination with other entities serving veterans with disabilities, to help veterans more easily navigate available programs and services; • expanding the Veterans Think Tank, which consists of internal and external subject matter experts who share knowledge, resources, and strategies to more efficiently and effectively coordinate services and case management activities; and • increasing collaboration with veterans' stakeholder organizations and service providers to include: o TWC's Texas Veterans Leadership Program o Texas Veterans Commission o HHSC o U.S. Department of Veterans Affairs The CSNA identified other underserved populations such as youth transitioning from high school and individuals with mental illness. These results are consistent with the priority areas identified in early 2014 during the legacy DARS strategic planning process for FY'15— 19. Additionally, the CSNA identified several opportunities for continued improvement of service delivery processes, including increasing customer engagement, improving customer service, streamlining eligibility, and increasing staff and customer knowledge of work incentives and how work impacts Social Security Disability Insurance benefits and Supplemental Security Income. These opportunities for improvement are further addressed in section "j. Statewide Needs Assessment" of this plan. State Rehabilitation Council Support RCT partners with VRD in fulfilling the requirements of the federal Rehabilitation Act for the delivery of quality, customer-responsive VR services. Its stated mission is to partner with TWC to advocate for Texans with disabilities in the VR process. RCT is a valued and active partner in the development of VR goals, priorities, and policies; funds are allocated by TWC for the operation of RCT to meet its mandate and obligations. RCT reviews, analyzes, and advises TWC on: • performance related to eligibility; • the extent, scope, and effectiveness of VR services; and • functions performed by TWC. RCT also reviews findings from quarterly customer satisfaction surveys and assists with the VRD VR state plan and the comprehensive statewide needs assessment.

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).

VRD developed a formalized method of reviewing proposed ideas and initiatives for Pre-ETS. This method includes the establishment of a core group of staff that reviews proposed ideas for Pre-ETS on a bi-weekly basis. A Pre-ETS mailbox was developed so field staff can ask questions and obtain consistent responses from the state transition program specialists leading up to implementation of Pre-ETS. The following strategies will expand and improve VR services for students and youth with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities by: • providing supported employment services to youth with the most significant disabilities, and enhanced coordination to ensure extended support is in place for customers to achieve and maintain employment outcomes; • evaluating, revising, and developing policy, procedures, and staffing strategies to improve consistency and increase effectiveness in the provision of transition services; • expanding and increasing partnerships with schools to facilitate the coordination and provision of Pre-ETS to students with disabilities; • expanding and increasing partnerships with state and local secondary and postsecondary educational institutions and organizations to facilitate the identification of best practices, leveraged resources, and improved coordination; • continuing Project HIRE and Project SEARCH programs that assist students and youth with developmental disabilities to successfully transition to postsecondary training and competitive, integrated employment, respectively; • developing and delivering a transition training module on best practices pertaining to provision of transition services, guidance and career exploration, postsecondary options, job readiness, and encouragement of customer self-advocacy; • collaborating with TEA, education service centers, TWC, LEAs, and community and technical colleges to improve access and transition for students moving from secondary to postsecondary education and training; • developing additional work experience options such as part-time, summer, and volunteer work experiences and other work-based learning opportunities; and • enhancing existing Pre-ETS initiated in 2016: summer work experience, transition nights, transition academies, and STEM career awareness and exploration. These activities leverage partnerships with Boards, secondary and postsecondary education institutions, and employers.

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

• VRD staff works with a network of CRPs across the state, including those that provide disability education, work readiness, and employment services. To increase the competencies of these providers, VRD: • continues to operate an outcome-based payment system for supported employment and job placement services; • requires Employment Service Providers (ESP) staff to obtain training and credentialing to ensure that job skills trainers, job placement specialists, supported employment specialists, self-employment, and vocational adjustment trainers have the basic skills necessary to facilitate services so the customer achieves required deliverables as defined in the VR Standards; • requires each Standards' contractor who provides a service for customers to have a director who is credentialed to oversee staff and compliance; • continually assesses the need to change or

modify CRP services based on the emerging needs of customers and businesses; • has implemented new Work Experience services to allow customers to participate in volunteer, internship, or paid temporary work settings—these services help customers learn or enhance soft and hard skills in areas of interest and can also help customers validate a potential or planned vocational goal for placement; Work Experience services can also be used for trial work evaluations as a means of providing information necessary to determine eligibility; • continually explores opportunities to add innovative programs supportive of WIOA Pre-ETS requirements and other services to prepare and support customers in their long-term employment placement; • continues to review the need for revising the outcome-based payment method for supported employment and job placement to better serve (1) supported self-employment and (2) individuals with autism. In 2014, legacy DARS added the employment premium service to reward providers who maintain training and skills necessary to work with specific populations to increase successful outcomes; the services eligible for the premium are criminal background, wage, professional placement, deaf and hard of hearing, and Autism Spectrum Disorder; • has implemented the use of transition educator providers. The transition educator service provider is an individual who is not currently a contracted provider; has a master's degree or a bachelor's degree in rehabilitation, counseling and guidance, psychology, education, or a related field; and is or has been an employee of a school system or a Texas education service center within the past fiscal year. These providers were added to better meet the needs of transition age students; and • requires ESPs to identify strategies for using the naturally occurring work and social supports (including ongoing natural and paid supports) for extended services.

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

VRD maintains a quality assurance and quality improvement framework. This framework includes the concept of continuous quality assurance and quality improvement using mission and strategic planning, leadership, communication, customer satisfaction results, data analysis, monitoring, and performance evaluation. This involves strategies to improve performance with respect to WIOA §116 performance accountability measures and includes the following actions: • VRD, in cooperation with TWC Operational Insight, will collect, monitor, and evaluate data for the WIOA core measures, and develop strategies to address gaps in performance that are identified through routine reports, quarterly performance reports through on-site budget and performance reviews, and the quality assurance program. • VRD will assess and identify staff training needs and opportunities to build competency and increase capacity to assist program participants with identification of an employment goal and development of the Individualized Plan for Employment. • VRD will implement training courses and develop new community partnerships to focus on postsecondary education to increase employment in high-skill, high-wage occupations by increasing the number of customers receiving postsecondary education and training. • VRD will replicate initiatives such as Project HIRE and Project SEARCH to provide training and certificates as well as on-the-job skills gains and/or credentials for employment. • VRD has consolidated its General and Blind Business Relations Teams into one unit. It is composed of Business Relations Coordinators (BRCs) from each division who work with regional and field management and staff to provide a variety of services to employers. • VRD will continue to enhance its system to assess and monitor effectiveness in serving employers.

The VR BRCs will coordinate more closely with Boards, and work in partnership and as team members in the Business Services Units.

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

As a division of TWC, VRD participates in the planning for and evaluation of the Texas workforce system conducted by the Texas Workforce Investment Council (TWIC), which serves as the state workforce investment board. These activities include: • participating in the development and implementation of the state-mandated strategic plan for the Texas workforce system; • participating in TWIC meetings and serving on the TWIC Apprenticeship and Training Advisory Committee; and • reporting quarterly and annually as requested by TWIC on the division's activities to implement goals and objectives in the Texas workforce system strategic plan. VRD works closely with other TWC staff to provide information, partner on community initiatives, and enhance customer referral processes. Across the state, VRD counselors have strong relationships with the 15 Disability Navigators located at Workforce Solutions Offices to provide consultation on disability issues to workforce system staff, and provide direct assistance to customers with disabilities as needed. Ongoing collaborative efforts between VRD and each of the 28 Boards have resulted in projects, initiatives, and processes such as joint community outreach and awareness events, summer youth initiatives, employer symposia and job fairs, customer referrals, coordination of services, and cross-training for staff.

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

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

Goal Area 1: Target Populations Priorities • Improve customer employment outcomes for individuals with significant disabilities, including but not limited to individuals who are blind, or significantly visually impaired; individuals who are from minority backgrounds; individuals with neurodevelopmental disorders (including autism, intellectual disabilities, and learning disabilities); individuals with mental health disorders, and veterans with disabilities. • Increase counselors' knowledge of work incentives and the effect of earnings on Social Security Disability Insurance and Supplemental Security Income to improve counselors' ability to provide vocational counseling on decisions impacting employment. • Provide a customer service delivery system that makes information available to customers on their options for services, providers, careers, and other areas, to enable them to make informed choices and to provide them with quality services that are delivered in a timely manner. Strategies • Strengthening and expanding collaboration, outreach, and education with various partners to efficiently and effectively use existing resources. • Assessing business processes, policy, training, and organizational capacity on an ongoing basis to make consistent improvements in employment outcomes. • Increasing employer knowledge and awareness regarding the benefits of hiring individuals with disabilities. • Increasing customer knowledge and awareness of VRD services and benefits offered to individuals with disabilities, and other state and federal assistance programs. • Promoting the use of the Language Line as a resource for those who are not fluent in English. • Actively recruiting VR counselors who are Spanish speakers to better serve the Hispanic population. •

Strengthening and developing relationships with local referral sources that serve individuals who are minorities who have the most significant disabilities. • Providing eye exams to Hispanic individuals in south Texas who lack other medical resources. Success will be measured by: • an increase in the number of individuals with developmental or intellectual disabilities, neurodevelopmental disorders (including autism), or mental health disorders, and veterans served; • an increase in the number of successful employment outcomes for target populations; and • enhanced customer satisfaction results indicated by the customer satisfaction survey. Goal Area 2: Services to Students and Youth with Disabilities Priorities • Expand and improve VR services, including Pre-ETS for students with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities. • Provide supported employment services to youth and other individuals with the most significant disabilities who require extended support to achieve and maintain an employment outcome. Strategies VRD developed a formalized method of reviewing proposed ideas and initiatives for Pre-ETS. This method includes the establishment of a core group of staff who reviews proposed ideas for Pre-ETS biweekly. Additionally, a Pre-ETS mailbox was developed so field staff can ask questions and obtain consistent responses from the state transition program specialists leading up to implementation of Pre-ETS. The following strategies will expand and improve VR services for students and youth with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities: • Providing supported employment services for youth with the most significant disabilities, and enhanced coordination to ensure extended supports are in place for customers to achieve and maintain employment outcomes. • Evaluate, revise, and develop policy, procedures, and staffing strategies to improve consistency and increase effectiveness in the provision of transition services. • Develop a transition training module, which will provide guidance and best practices pertaining to provision of transition services. • Expand and increase partnerships with state and local secondary and postsecondary educational institutions and organizations to facilitate the identification of best practices, leveraged resources, and improved coordination. • Launch the Pathways to Careers Initiative (PCI), an $11.9M multi-strategy initiative to expand Pre-ETS to Texas students with disabilities. PCI includes five new strategies: Summer Earn and Learn, Charting the Course: Planning for Life after High School, Career Pathways Academies, Explore STEM!, and Transition Planning for Students in Private and Home Schools. The first PCI strategy implemented in summer 2017 was the Summer Earn and Learn, which is a work-based learning program conducted in partnership with Boards and their employer partners. Summer Earn and Learn is a statewide strategy that includes employability skills training and paid work experience for students with disabilities. It will continue to be offered in each workforce area during the summer months when students are out of school. Boards are encouraged to develop work experience opportunities with workforce area employers in high-growth occupations, skilled trades and crafts, and other high-demand occupations. Through the PCI initiative, students with disabilities will be better prepared to achieve competitive integrated employment through participation in employability skills and work readiness training, career exploration activities, work experience, and postsecondary education. Success will be measured by: • an increase in successful outcomes for students with disabilities and youth; and • an increase in consumer satisfaction of students and youth with disabilities as measured by the

consumer satisfaction survey. Goal Area 3: Partnerships Priorities Enhance collaboration and coordination with Boards, employers, and other stakeholders to increase competitive integrated employment outcomes and work-based learning experiences, which may include in-school or after-school opportunities such as internships, volunteer positions, and summer and year-round work experience programs. Strategies VRD will do the following to strengthen partnerships with Boards and enhance strategies to develop and maintain employer relationships that result in competitive integrated employment outcomes and work-based learning experiences: • Continuing to collaborate on special initiatives and activities for youth, veterans, and other persons with disabilities; • Developing and implementing summer work experience programs with the Boards; • Increased participation in Board committees; • Increased coordination with Board contractor BSUs and with other business intermediaries such as local Chambers of Commerce; • Providing information to VR partners pertaining to various disabilities, assistive technology, and suggestions for reasonable accommodations; • Developing and implementing agency-wide business relationships strategies with a regional focus that creates a unified, comprehensive approach to serving businesses; • Providing Dual Customer Service to staff, to instruct on how to best contact and meet the needs of our business partners; and • Aligning counseling critical thinking processes around employment opportunities and data to engage customers in defining their optimal vocational opportunities. Success will be measured by: • an increase in sustained business relationships leading to successful outcomes for our consumers; • an increase in work-based learning experiences; and • an increase in the number of partnerships for special initiatives and ongoing coordination of services to businesses.

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

Technology Computer assistive technology services and assistive technology devices are provided for customers at each stage of the rehabilitation process. The legacy DRS Rehabilitation Technology Resource Center (RTRC) began as a lab that was staffed by employees to offer a centralized location where customers could learn about and have hands-on experience with the latest technology. To reach a wider customer base, VRD is providing continuous education and resources to field staff through a variety of mechanisms. Rather than having a centralized equipment location, assistive technology kits composed of nearly 40 of the most popular assistive technology devices were assembled and provided to each of the regions. Additionally, state office program specialists provide resources such as online video trainings, webinars, and workshops on available assistive technology, and will offer hands-on training and education throughout the state. State office program specialists are trained subject matter experts across the state in the areas of assistive technology and vehicle modifications. With program specialists, field staffs are better equipped to provide individualized services that support and facilitate customer participation in education, rehabilitation, and accomplishment of employment goals. Services may also include assistance with accessible transportation and independent living needs. To meet the assistive technology needs of VR customers with visual impairments, VRD has designated state program specialists and regional staff that work with blind specialty caseloads to provide assistive technology to individuals who are blind or visually impaired. VRD continues to work with organizations across the state to support Pre-ETS for students with disabilities, including: • contracted assistive technology evaluation sites; and • the VRD Assistive Technology Unit Contract providers are required to complete a

thorough testing program to ensure they meet minimal standards of proficiency to become approved assistive technology providers. VRD coordinates with other programs when assistive technologies are needed that are not vision related. VRD also uses programs such as the Computer/Electronics Accommodations Program when a customer is interested in employment with the federal government, the Specialized Telecommunications Assistance Program to obtain telecommunication devices, and various assistive technology programs for the deaf and hard of hearing. Diabetes Services When customers seek VR services, diabetes is sometimes the underlying cause of the disability. Diabetes is often a contributing factor for customers with amputations, end stage renal disease, cardiovascular disease, stroke, and hearing loss. Additionally, customers with a secondary condition of diabetes sometimes comprise as much as 70 percent of blind services caseloads. Addressing the diabetes is often necessary for the customer to receive the full benefit of medical services and to address potential job implications. The Diabetes Program Specialist provides training and consultation to vocational rehabilitation counselors, other agency staff, and diabetes educators regarding the physical and vocational implications of diabetes, its complications, and needed accommodations. Critical to a customer's success is an understanding of how diabetes impacts the ability to work (sick days, lost time, increased health care costs), and adaptive techniques and equipment to manage the disease. Specifically, the Diabetes Program Specialist delivers training on the impact of diabetes on businesses and the functional and vocational implications of diabetes and its complications through internal training of staff and diabetes educators via the Texas Confidence Builder training. The Diabetes Program Specialist develops innovative ways to educate providers of diabetes education on the abilities of customers with disabilities to self-manage their diabetes, the adaptive techniques for, equipment and supplies, and the challenges of managing diabetes at work. System of Quality Assurance In 2014, legacy DARS convened the Quality Assurance and Improvement Workgroup to ensure a coordinated and comprehensive approach to quality improvement. One of the group's tasks was to propose a Quality Assurance and Continuous Quality Improvement Framework. The framework includes the concept of continuous quality assurance and quality improvement by using mission and strategic planning, leadership, communication, customer satisfaction results, data analysis, monitoring, and performance evaluation. Monitoring and performance management includes having a robust system of case review. Statistically valid sampling methodology is used to determine the unit specific goals based on customers served. Consideration also is given to actual cases that meet the risk criteria and other trends observed during case reviews and data analysis. The quarterly unit case review plan has specific focus area goals to be performed at the unit level. Ultimately, the goal is to review a minimum of 10 percent of all cases, with a focus on cases that are at the most risk due to case cost, case length, lack of engagement, or failure to render timely services within federally mandated parameters. Review information and detailed data analysis is used to develop, enhance, or modify current training, policy, and/or coaching needs at all levels. Figure 1 - Quality Assurance and Continuous Quality Improvement Framework Increased Emphasis on Braille Literacy A braille training program for new Vocational Rehabilitation Teachers (VRTs) and Independent Living Services for Older Individuals Who Are Blind (ILS-OIB) workers that incorporates the Simply Braille curriculum was designed and is now being delivered by the VRD VRT program specialists. In FFY'15, legacy DBS participation in Simply Braille curriculum training increased to six new VRTs and three IL workers, now called ILS-OIB workers. The average time to complete the training was 25 weeks for uncontracted and 20

weeks for contracted Braille. Simply Braille and Hadley Institute for the Blind's curriculum were being used as the primary training curricula for all VRT and IL workers. Braille training is provided to customers individually or in group classes by VRT-OIB workers. Customers may also be supported when taking braille correspondence courses through Hadley Institute for the Blind. Strategy: Transition all VRTs and ILS-OIB workers from English Braille American Edition to Unified English Braille (UEB) through training and support from VRD's VRT program specialists. Measure: All VRTs and ILS-OIB workers will transition to UEB by FFY'19.

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.

Barriers to serving unserved and underserved populations identified in the CSNA included: • lack of awareness of the impact of receiving services on Social Security benefits, highlighting the disincentive to work from the fear of losing benefits; • lack of awareness of VRD services among customers and/or parents; • lack of awareness of VRD services among doctors and other medical professionals; • growing need for services that will require partners to leverage available funding and may require increased funding; and • scarcity of available transportation that creates challenges for potential customers, especially in rural areas, to access VRD offices, providers, and jobs. Strategies The following VRD strategies address the barrier created by not understanding the impact of service receipt on Social Security benefits: • Work closely with community partners such as the local Social Security Administration (SSA) offices and Work Incentives Planning and Assistance programs to dispel inaccurate perceptions regarding loss of benefits and attempt to work efforts. • Provide statewide training for all VRCs on basic benefits and work incentives support and services. • Expand training for additional VRD staff to be Benefits Subject Matter Resources (SMRs), including a train-the-trainer component for all SMRs, and provide ongoing statewide training in federal and state work incentive programs for all VRD staff. • Enhance current partnership with the SSA to encourage CRP providers to become ENs under the SSA Ticket to Work Program. VRD offers incentive payments to CRP-ENs that provide: o supported employment or job placement services during the provision of VR services; and o extended support to Ticket to Work customers after VR case closure to advance employment or increase customer earnings. The following VRD strategies address the barrier created by the lack of awareness of VRD services among customers, parents, and doctors and other medical professionals: • Increase collaboration with other organizations to improve customer access to services. • Increase outreach efforts in the business community. • Educate community leaders on the availability of VRD services to enhance outreach efforts to all ethnic groups. • Offer the 2-1-1 Texas statewide referral helpline, a service that assists customers with referrals to appropriate agencies for help. • Enhance community outreach activities. The following VRD strategies address the growing need for services by leveraging other partner and community resources, and seeking opportunities to increase efficiency in VRD structure and processes: • VRD will continue to work to educate state officials and oversight authorities about the value of VR services to Texans with disabilities and to the overall state economy. • VRD will leverage existing resources and make every effort to draw down the maximum federal funding match to provide needed services for Texans with disabilities. • VRD will fully use SSA programs and work to maximize SSA/VR reimbursements. • VRD will provide budget management training for

staff. VRD strategy addressing the barrier created by scarcity of available transportation will be to continue to advocate for local improvement in public transportation at HHSC's regional coordination forums.

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 Strategies Contributing to the Success of Goals: • Strengthening and expanding collaboration, outreach, and education with various partners to efficiently and effectively use existing resources. • Assessing business processes, policy, training, and organizational capacity in an ongoing basis to make consistent improvements in employment outcomes. • Increasing employer knowledge and awareness regarding the benefits of hiring individuals with disabilities. • Increasing customer knowledge and awareness of VRD services and benefits offered to individuals with disabilities, and other state and federal assistance programs. • Promoting the use of the Language Line as a resource for those who are not fluent in English. • Actively recruiting VR counselors who are Spanish speakers to better serve the Spanish-speaking population. • Strengthening and developing relationships with local referral sources that serve individuals who are minorities who have the most significant disabilities. • Providing eye exams to Hispanic individuals in South Texas who lack other medical resources.

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

Goal Area 1: Target Populations Priorities: • Improve customer employment outcomes for individuals with significant disabilities to include individuals who are blind or significantly visually impaired, individuals who are from minority backgrounds, individuals with neurodevelopmental disorders (including autism, intellectual disabilities, and learning disabilities), individuals with mental health disorders, and veterans with disabilities. • Increase counselors' knowledge of work incentives and the effect of earnings on Social Security Disability Insurance and Supplemental Security Income to improve counselors' provision of vocational counseling on decisions impacting employment. • Provide a customer service delivery system that makes information available to customers on their options for services, providers, careers, and other areas, to (1) enable informed customer choice and (2) deliver quality and timely services. Measures: Provide VR services that support quality employment outcomes for individuals with significant disabilities by meeting or exceeding performance goals. Name of Measure: Goal FFY'17 Performance Percent of Goal Number of Customers Who Achieved Employment Outcomes — VR General 14,136 13,794 97.6% Number of Customers Who Achieved Employment Outcomes — VR Blind 1,456 1,256 86.3% Percent of Customers Who Achieve Employment Outcomes — VR

General 55.8% 63.6% 114.0% Percent of Customers Who Achieve Employment Outcomes — VR Blind 68.90% 68.5% 99.4%

Measure: An increase in the number of participants served with neurodevelopmental disabilities, psychological disabilities, and participants who are veterans. Populations PARTICIPANTS SERVED FFY'16 VR Blind FFY'16 VR General FFY'17 VR Blind FFY'17 VR General

with neurodevelopmental disability 493 21,764 513 23,455

with psychological disability 370 20,887 376 21,326 veterans 186 2,728 171 2,672 The table above compares the FFY'17 and FFY'16 performance for service to Blind Services and Rehabilitation Services customers with neurodevelopmental disability or psychological disability, or who customers who are veterans. In FFY'17, Blind Services served 513 customers with a neurodevelopmental disability, an increase of 20 from FFY'16. In FFY'17, Rehabilitation Services served 23,455 customers with a neurodevelopmental disability, an increase of 1,691 from FFY'16. In FFY'17, Blind Services served 376 customers with a psychological disability, an increase of six from FFY'16. In FFY'17, Rehabilitation Services served 21,326 customers with a psychological disability, an increase of 439 from FFY'16. In 2017, Blind Services served 171 veteran customers, a decrease of 15 from FFY'16. In 2017, Rehabilitation Services served 2,672 veteran customers, a decrease of 56 from FFY'16. Measure: An increase in the number of successful employment outcomes for target populations. Populations SUCCESSFUL OUTCOMES FFY'16 VR Blind FFY'16 VR General FFY'17 VR Blind FFY'17 VR General with neurodevelopmental disability 28 3,276 32 3,294 with psychological disability 66 3,331 47 3,080 veterans 40 663 40 574 The table above compares FFY'17 and FFY'16 Blind Services and Rehabilitation Services successful employment outcomes for target populations with neurodevelopment disability or psychological disability or customers who are veterans. In FFY'17, Blind Services saw successful employment outcomes for 32 customers with neurodevelopmental disability, an increase of four from FFY'16. In FFY'17, Rehabilitation Services saw successful employment outcomes for 3,294 customers with neurodevelopmental disability, an increase of 18 from FFY'16. In FFY'17, Blind Services saw successful employment outcomes for 47 customers with psychological disability, a decrease of 19 from FFY'16. In FFY'17, Rehabilitation Services saw successful employment outcomes for 3,080 customers with psychological disability, a decrease of 251 from FFY'16. In FFY'17, Blind Services saw successful employment outcomes for 40 veteran customers, no change from FFY'16. In FFY'17, Rehabilitation Services saw successful employment outcomes for 574 veteran customers, a decrease of 89 from FFY'16.

Goal 1 Strategies Contributing to the Success of Goals: • Strengthening and expanding collaboration, outreach, and education with various partners to efficiently and effectively use existing resources. • Assessing business processes, policy, training, and organizational capacity in an ongoing basis to make consistent improvements in employment outcomes. • Increasing employer knowledge and awareness regarding the benefits of hiring individuals with disabilities. • Increasing customer knowledge and awareness of VRD services and benefits offered to individuals with disabilities, and other state and federal assistance programs. • Promoting the use of the Language Line as a resource for those who are not fluent in English. • Actively recruiting VR counselors who are Spanish speakers to better serve the Spanish-speaking population. • Strengthening and developing relationships with

local referral sources that serve individuals who are minorities who have the most significant disabilities. • Providing eye exams to Hispanic individuals in South Texas who lack other medical resources. Goal 1: Factors That Impeded Achievement of the VR Blind and General Goals and Priorities: • The implementation of the WIOA requirement for competitive integrated employment closures phased out homemaker closures and thus reduced the number of overall successful closures obtained in prior years. • A shortage of CRPs for Blind Services customers limits the availability of specialized supports for some individuals with multiple disabilities. • Additional research is needed to better identify factors that may be impeding achievement of goals and priorities for individuals with psychological disabilities. • There are numerous federal and state programs available to assist veterans, some focusing specifically on veterans with disabilities. Veterans may be accessing these services prior to applying for VR services or may not be aware that VR is also available to assist them with achieving their employment goals. An increase in training by state office staff for counselors with specialty caseloads, such as counselors with psychological and veteran caseloads, may be needed to enhance outreach efforts and improve coordination with federal, state, and community programs. Goal Area 2: Services to Students (Ages 14—22) and Youth (Ages 14—24) with Disabilities Priorities • Expand and improve VR services, including Pre-ETS for students with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities. • Provide supported employment services to youth and other individuals with the most significant disabilities who require extended support to achieve and maintain an employment outcome. Measure: An increase in successful outcomes for students with disabilities and youth. Populations

SUCCESSFUL OUTCOMES FFY'16 VR Blind FFY'16 VR General FFY'17 VR Blind FFY'17 VR General Youth only 50 2,550 82 2,333 Student & Youth 55 395 10 574

The above table compares the successful employment outcomes in FFY 2017 and FFY 2016 for student and/or youth populations in Blind Services and Rehabilitation Services. In FFY'17, Blind Services saw successful employment outcomes for 82 youth-only (not a student, because a customer can be a youth without being a student) customers, an increase of 32 from FFY'16. In FFY'17, Rehabilitation Services saw successful employment outcomes for 2,333 youth-only (not a student) customers, a decrease of 217 from FFY'16. In FFY'17, Blind Services saw successful employment outcomes for 10 students and youth-only customers, a decrease of 45 from FFY'16. In FFY'17, Rehabilitation Services saw successful employment outcomes for 574 students and youth-only customers, an increase of 179 from FFY'16.

Goal 2 Strategies Contributing to Success of Goals: VRD developed a formalized method of reviewing proposed ideas and initiatives for Pre-ETS. This method includes the establishment of a core group of staff members who review proposed ideas for Pre-ETS biweekly. Additionally, a Pre-ETS mailbox was developed so field staff can ask questions and obtain consistent responses from the state transition program specialists leading up to implementation of Pre-ETS. The following strategies were implemented to expand and improve VR services for students and youth with disabilities who are transitioning from high school to postsecondary education and/or employment, and improve coordination with state and local secondary and postsecondary educational entities: • Provide supported employment services for youth with the most significant disabilities, and enhanced

coordination to ensure extended supports are in place for customers to achieve and maintain employment outcomes. • Evaluate, revise, and develop policy, procedures, and staffing strategies to improve consistency and increase effectiveness in the provision of transition services. • Develop a transition training module, which will provide guidance and best practices pertaining to provision of transition services. • Expand and increase partnerships with state and local secondary and postsecondary educational institutions and organizations to facilitate the identification of best practices, leveraged resources, and improved coordination. • Launch the Pathways to Careers Initiative (PCI), an $11.9 million multi-strategy initiative to expand Pre-ETS to Texas students with disabilities. PCI includes five new strategies: Summer Earn and Learn, Charting the Course: Planning for Life after High School, Career Pathways Academies, Explore STEM!, and Transition Planning for Students in Private and Home Schools. The first PCI strategy implemented in summer 2017 was Summer Earn and Learn, which is a work-based learning program conducted in partnership with Boards and their employer partners. Summer Earn and Learn is a statewide strategy that includes employability skills training and paid work experience for students with disabilities. It will continue to be offered in each workforce area during the summer months when students are out of school. Boards are encouraged to develop work experience opportunities with workforce area employers in high-growth occupations, skilled trades and crafts, and other high-demand occupations. Through PCI, students with disabilities will be better prepared to achieve competitive-integrated employment through participation in employability skills and work readiness training, career exploration activities, work experience, and postsecondary education. • PCI was expanded in 2017 to add four more initiatives, including the hiring of Student HireAbility Navigators, Statewide Capacity Building and Coordination, a Pre-ETS Elective Course Curriculum, and Pre-ETS Tools for Students. Goal 2: Factors That Impeded Achievement of the VR Blind and General Goals and Priorities for Youth and Students: • Significant staff effort has been focused on engaging students earlier to provide more Pre-ETS services, which are described in the WIOA regulations as services provided early in a student's career exploration continuum and well before a student will achieve his or her employment goal. As a result, in the initial years of implementing WIOA, the number of successful closures will decrease while the length of time students is served by VR is anticipated to increase. • For youth with disabilities, WIOA increases the length of time and depth of services being provided in supported employment. This results in cases being open longer and, therefore, fewer cases being closed successfully in the initial years of WIOA implementation. • During the combination of the two Texas VR programs in FY'17, a temporary hiring freeze resulted in an increase in the number of vacant caseloads; however, as a result of the combination, TWC increased the number of counselors focused solely on serving students. Goal Area 3: Partnerships Priorities: • Enhance collaboration and coordination with Boards, employers, and other stakeholders to increase competitive integrated employment outcomes and work-based learning experiences, which may include in-school or after-school opportunities, such as internships, volunteer positions, and summer and year-round work experience programs. Measure: An increase in sustained business relationships leading to successful outcomes for customers. • In FFY'17, there were 882 VRD partnerships, compared to 584 in FFY'16, an increase of 298. Measure: An increase in work-based learning experiences. • This data was not tracked in FFY'16. A baseline is being established in 2017. Two examples of work-based learning initiatives include the WinCo Project in Denton, Texas, and Summer Earn and Learn, with participation from all 28 Boards. Sixteen

customers completed the WinCo program, and 16 have been hired; 1,522 students participated in the Summer Earn and Learn, which began in June 2017. Measure: An increase in the number of partnerships for special initiatives and ongoing coordination of services to businesses. • In FFY'17, there were 42 partnerships for special initiatives with businesses, compared to 30 in FFY'16. Goal 3 Strategies Contributing to Success of Goals: VRD implemented the following strategies to strengthen partnerships with Boards and enhance strategies to develop and maintain employer relationships that result in competitive integrated employment outcomes and work-based learning experiences: • Continuing to collaborate on special initiatives and activities for youth, veterans, and other individuals with disabilities; • Developing and implementing summer work experience programs with Boards; • Increased participation in Board committees; • Increased coordination with Board Business Service Units and other business intermediaries such as local chambers of commerce; • Providing information to VR partners pertaining to various disabilities, assistive technology, and suggestions for reasonable accommodations; • Developing and implementing agency-wide business relationships strategies with a regional focus that creates a unified, comprehensive approach to serving businesses; • Providing dual customer service to staff to instruct on how to best contact and meet the needs of our business partners; and • Aligning counseling critical thinking processes with employment opportunities and data to engage customers in defining their optimal vocational opportunities.

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.

The following strategies contributed to the achievement of the goal: • Continued development and implementation of improved benchmark system for the provision of specific supported employment services statewide. • Developed and implemented complimentary services for specific populations, such as individuals with autism and deafness diagnoses • Developed a supported employment technical assistance training model for staff members to improve their ability to determine when supported employment services are needed. • Developed tools to help staff members monitor and provide guidance to supported employment contract providers. • Continued to require credentialing for Supported Employment providers in order to educate and train best practices and improve service delivery.

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

In addition to the goals listed above, priorities for funds received under the Rehabilitation Act §603 are to increase the number of customers receiving supported employment services who achieve employment outcomes and the number of supported employment service providers statewide, and to maintain the number of customers receiving supported employment services within their home communities. Goal for Blind Services: To increase access to and provide effective and quality-based supported employment services. Measure:

The number of blind or visually impaired customers receiving supported employment services who achieve employment outcomes will equal or exceed 48. FFY'17 Goal Above/Below Target 40 48 (-) 16.6% Forty blind or visually impaired customers receiving supported employment services in FFY17 achieved employment outcomes, 16.6 percent below the target. Measure: The number of blind or visually impaired customers receiving supported employment services will equal or exceed 400. FFY'17 Goal Above/Below Target 371 400 (-) 7.3% In blind Services, 371 customers who were blind or visually impaired received supported employment services, 7.3 percent below the target. Measure: Expand customer employment opportunities by increasing the number of supported employment service providers that can work effectively with customers who are blind by 10% (34 total supported employment vendors). FFY'17 Goal Above/Below Target 23 34 (-) 11 In FFY'17, 23 CRPs provided supported employment services to customers who were blind or visually impaired, 11 below the target. Factors That Impeded Achievement of the Supported Employment Goals and Priorities: • A shortage of providers for supported employment continued to be a challenge for the VR program in providing services to customers who are blind or visually impaired. Toward the end of FFY'17, improvements were underway to address these impediments to goal achievement: • In the last month of the fiscal year, state office staff traveled across the state to provide training to supported employment providers. • October 1, 2017, state office staff implemented the combined Standards for Providers of supported employment using the same criteria for both blind and general VR divisions to assist in improving achievement of the goals and priorities. • In the last quarter of the fiscal year, the program initiated plans for immersion training to be implemented for supported employment providers to educate them on best practices and how to work with customers who are visually impaired or blind. Goal for Rehabilitation Services (VR General): Provide supported employment services to individuals with the most significant disabilities who require extended supports in order to achieve and maintain an employment outcome. Measure: 50 percent or greater of VR General customers exiting the VR program after receiving supported employment services will achieve an employment outcome. FFY'17 Goal Above/Below Target 56.6% 50% (+) 6.6% In VR General, 56.6 percent of customers achieved employment outcomes after receiving supported employment services, exceeding the target by 6.6 percent. Supported Employment Strategies for VR General that Contributed to Achievement of Goals The following strategies contributed to the achievement of the goal: • Continued development and implementation of improved benchmark system for the provision of specific supported employment services statewide. • Developed and implemented complimentary services for specific populations, such as individuals with autism and deafness diagnoses • Developed a supported employment technical assistance training model for staff members to improve their ability to determine when supported employment services are needed. • Developed tools to help staff members monitor and provide guidance to supported employment contract providers. • Continued to require credentialing for Supported Employment providers in order to educate and train best practices and improve service delivery.

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

WIOA measures are not included, as VRD has been working to develop the data elements necessary to begin reporting in the RSA-911 beginning Plan Year 2017 (July 1, 2017), and, therefore, VRD does not have complete data from which to report.

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

For both VR Blind and VR General, a portion of federal funds allocated were used for Innovation and Expansion (I&E) activities, including but not limited to, the following strategic initiatives consistent with the requirements of the Rehabilitation Act. Technology VR customers were offered individualized technology-related to support and facilitate their participation in rehabilitation, education, and employment opportunities. Technology-related services also included assisting customers with transportation and independent living needs. As provided, assistive technology services can be described as ways in which a technology-based approach is used to maintain, increase, or improve the functional capabilities of individuals with disabilities as part of their rehabilitation process. Ensuring and supporting access to and use of appropriate assistive technology is essential for customers, employers, and community partners. To help provide statewide support for assistive technology and vehicle modifications, the following strategies were used: • Support from state office program specialists in the areas of vehicle modifications, workplace modifications, residential modifications, assistive hardware and software, and other assistive technologies. • Access to assistive technology equipment through the device loan program, including availability of assistive technology kits in the regional offices, which include commonly useful assistive technology devices such as special keyboards, devices for individuals who are deaf or hard of hearing, etc. The kits allow customers to try devices before they are purchased to ensure they are appropriate to individual customer needs. • Access to research and information regarding new and emerging technologies. • Development of teams of assistive technology subject matter experts and vehicle modification experts to help support the service delivery process throughout the state. • Presentation of information by state office program specialists on relevant topics during monthly teleconferences to help share information with staff. • Coordination of case staffing sessions to review and discuss individual needs related to assistive technology. • Continued efforts to develop or enhance partnerships in the community that can help provide resources for customers, for example, the University of Texas' Texas Technology Access Program. Diabetes Services When customers seek VR services, diabetes is sometimes the underlying cause of the disability. Diabetes is often a contributing factor for customers with amputations, end stage renal disease, psychological disorders, cardiovascular disease, stroke, and hearing loss. Additionally, customers with a secondary condition of diabetes may comprise as much as 70 percent of blind services caseloads. Addressing the diabetes is necessary in order for the customer to receive the full benefit of medical services and to address potential job implications. The diabetes program specialist provides training and consultation to VR counselors, other TWC staff, and diabetes educators on the physical and vocational implications of diabetes, its complications, and needed accommodations. Critical to a customer's success is an understanding of how diabetes impacts the ability to work (sick days, lost time, increased health care costs), and adaptive techniques and equipment to manage the disease. Specifically, the diabetes program specialist delivers training on the impact of diabetes on businesses, and the functional and vocational implications of diabetes and its complications through internal training of staff and diabetes educators through the Texas Confidence Builder training. The diabetes program specialist develops innovative ways to educate providers of diabetes education on the abilities of customers with disabilities to self-manage their diabetes, the adaptive techniques for, equipment and supplies, and the challenges of managing diabetes at work. State Rehabilitation Council

Support The Rehabilitation Council of Texas (RCT) is the state rehabilitation council for the VR program. RCT assists VRD in fulfilling the requirements of the federal Rehabilitation Act for the delivery of quality, customer-responsive VR services. Funds are allocated for the operation of RCT to meet the goals and objectives set forth in its resource plan. RCT is a valued and active partner in the development of VR goals, priorities, and policies. RCT reviews, analyzes, and advises VRD about performance related to VR eligibility; the extent, scope, and effectiveness of VR services; policy changes related to service delivery to VR customers; and other functions related to the VR program performed by VRD. RCT also reviews and analyzes customer satisfaction with VR services and assists VRD in developing VR State Plans and in conducting the comprehensive statewide needs assessment.

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.

TWC's VRD is committed to providing quality services to customers with the most significant disabilities, including youth between ages 14—24 with the most significant disabilities. VRD uses supported employment and supported self-employment services, which are outcome-based services. VRD-supported employment (SE) offers competitive integrated employment in the community for customers with the most significant disabilities who need individualized assistance finding the most appropriate job match and require extended services, also known as long-term support within the work, community, and home environment, to maintain employment after VRD closes the VR case. Customers who benefit from VRD SE are those for whom traditional VR approaches have not been effective. Although some customers in SE have the ability to compete in the open job market, they often require assistance learning how to interact with potential employers and obtain, perform, or retain job tasks and responsibilities. They also require extended services (long-term support) not funded by VR to maintain long-term employment once VRD closes their case. Common resources that provide extended services for customers include nonprofits, as well as other county, state, and federal programs, as well as family and friends. Customers receiving VRD SE often have no or very limited work history in competitive integrated employment, have been excluded from community services through institutionalization, or have only participated in day habilitation programs or facility-based workshops funded by the Texas Health and Human Services Commission (HHSC). VRD SE services offer the best possible match between customer skills, interests, abilities, support needs, and an employer's unmet needs. VRD uses the "place, then train" concept, a two-part process to describe SE. The first step is to place customers with the most significant disabilities into a competitive integrated job based on their preferences, interests, assets, and abilities, as identified during a community-based assessment and an SE planning meeting. The second step is to provide training and support to the customer directly related to the job and then coordinate and train the designated extended service providers, or natural supports, to ensure a smooth transition with no interruption in service delivery prior to VRD case closure. VRD works in partnership with public and private nonprofit organizations, employers, and other appropriate resources for training, employment, and other time-limited services related to SE. Nearly 71 percent of the 8,098,819 Texans who

received services under the VRD SE program during Federal Fiscal Year 2016 (FFY'16) were identified as having the most significant disabilities. Approximately 57 percent of customers who received VRD SE services achieved an employment outcome. To achieve a smooth transition from VR SE services to HHSC SE services (extended long-term supports and services), TWC has a memorandum of agreement (MOA) with HHSC outlining each agency's responsibilities and timelines for the provision of services. VRD counselors are encouraged to invite HHSC providers and staff to plan meetings and maintain contact with the service coordinator, case manager, or other long-term support and services staff throughout the process. Additionally, VRD participated with HHSC in crafting the 1915(c) Medicaid home- and community-based waivers employment services definitions to ensure that the transition from VR to HHSC SE is as seamless as possible, without interruption in service delivery. With appropriate customer releases, HHSC shares the customer's individual-directed plan and plan of care with VRD, and VRD provides HHSC with the Individualized Plan for Employment. VRD will provide SE services for a period not to exceed 24 months. Extended services will be provided to youth with the most significant disabilities for a period not to exceed four years or when they reach 25 years of age; the extended services are provided by the designated state unit with the funds reserved under 34 C.F.R. §363.22 and §363.4(a)(2). VRCs work with Community Rehabilitation Program (CRP) SE specialists, HHSC providers, or service coordinators/case managers, and customers' natural support networks to develop short- and long-term support strategies based on individual needs. This ensures the appropriate amount of support is available and provided so that employment can be maintained. Extended services, known in Texas as long-term support and services, can be publicly funded, "natural" or "in-kind," or paid by the customer through SSI, Social Security Disability Insurance (SSDI), or another Social Security Administration Title II work incentive program. Examples of extended services include, but are not limited to, consulting with a customer's job supervisor regarding areas of concern or training needs; creating supports and strategies to improve work performance through job coaching; providing services such as medication management or hygiene; and identifying and training on transportation options. VRD offers supported SE services as an alternative employment option for customers with the most significant disabilities who choose to own their own business within their community. Supported SE is competitive employment whereby the customer owns, manages, and operates a business and is not considered an employee of another person, business, or organization. Supported SE businesses are typically small and require a team approach for planning and support. The business team is led by a Certified Business Technical Assistance Consultant (CBTAC), preferably with the SE credential from the University of North Texas, who assists with exploration, feasibility determination, development of a business plan, business launch, and addressing the customer's extended service needs. In supported self-employment, extended services help the customer effectively and efficiently run his or her business for a profit and can include long-term job skills training support, peer support, natural support, family support, or ongoing paid professional services required for the business. The supported self-employment specialist is required to be certified by the Center for Social Capital as a CBTAC.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

SE cases remain open for a 90-day period after being identified as "stable," with stable defined as the customer: • performing in a competitive, integrated job to the employer's satisfaction; • satisfied with the job placement; • having the necessary modifications and

accommodations at the worksite; • having reliable transportation to and from work; and • having extended services in place and support needs met, and working without intervention from SE or supported SE providers. Additionally, during the 90-day period between "Job Stability" and "Service Closure" for supported employment, CRPs do not provide services to customers.

In supported SE, "stability" is defined as: • the business is in operation with all supports necessary to run the business for at least eight weeks; and • the customer is working without support from the VRD-funded CRP. The customer's business must operate for an additional 90-day period with no support from the CRP to reach case closure. If VRD-supported providers, for either SE or supported SE, provide direct services to customers between stability and closure of the service, another "stability" period must be achieved before final outcomes are achieved for service closure. Once customers successfully maintain stability with extended services from by non-VRD resources only, the VRD SE or supported SE case is closed. A customer's extended services are documented, including the identified extended service provider, for both SE and supported SE services in the customer's Individualized Plan for Employment.

Establishing Funding Collaboration with community organizations and other state and federal agencies to identify, develop, and implement cooperative agreements and partnerships is essential to achieving successful employment outcomes for customers, particularly those with the most significant disabilities. TWC VRD identifies and makes arrangements, including entering into cooperative agreements with other state agencies and other appropriate entities, to assist in the provision of SE and supported self-employment services. With respect to the provision of extended services, VRD makes arrangements with other public or nonprofit agencies or organizations within the state, employers, natural supports, and other entities. Funding through WIOA Title VI and the Rehabilitation Act of 1973 §110, as amended, is available statewide to all VRCs to serve Texans with the most significant disabilities. At case closure, or at the conclusion of any time-limited post-employment services, the services paid for by Title VI, Part B and/or §110 funds are terminated. Additional potential funding sources include other Texas Workforce Solutions programs, the Social Security Administration's Ticket to Work Program, Texas Department of State Health Services (DSHS—the state agency for mental health), Centers for Independent Living (CILs), and HHSC Medicaid/CHIP, the administrative authority for all Medicaid waivers and state plan services. Additionally, HHSC is the operating authority for: • the majority of 1915(c) state Home and Community-based Services (HCS) Medicaid waivers; • 1915(k) Community First Choice; • Title XX social services; and • employment services provided through state general revenue funds.

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate **TWC Division for Rehabilitation Services**

Name of designated State agency **Texas Workforce Commission**

Full Name of Authorized Representative: **Cheryl Fuller**

Title of Authorized Representative: **Director, Division for Rehabilitation Services**

States must provide written and signed certifications that:

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA*, and its supplement under title VI of the Rehabilitation Act.** Yes

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the **designated State agency listed above** agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan* , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;** Yes

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes

7. The **Authorized Representative listed above** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; Yes

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

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

FOOTNOTES

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Certification 1 Footnotes

* Public Law 113-128.

** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

Certification 2 Footnotes

* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

** No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

*** Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

Certification 3 Footnotes

* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes

ADDITIONAL COMMENTS ON THE CERTIFICATIONS FROM THE STATE

Effective September 1, 2016, the Texas Department of Assistive and Rehabilitative Services (DARS) Division for Blind Services (DBS) and Division for Rehabilitation Services (DRS) Designated State Units (DSUs) transferred to the Texas Workforce Commission, which becomes the Designated State Agency (DSA). The DRS and DBS portions of the Texas Combined State Plan for Federal Fiscal Years 2017-2020 (VR Plans) are hereby amended to reflect that organizational and DSA change. All references to the entity which constitutes the DSA in the DBS and DRS VR Plans, Certifications and Assurances effective September 1, 2016 are changed from Department of Assistive and Rehabilitative Services to Texas Workforce Commission.

In addition, effective October 1, 2017, the DSU for General VR and the DSU for Blind Services were integrated into a combined DSU.

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 **Texas Workforce Commissioner-Division for Rehabilitation Services**

Full Name of Authorized Representative: **Cheryl Fuller**

Title of Authorized Representative: **Director**

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

CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT

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

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

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

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Applicant's Organization **Texas Workforce Commission-Division for Rehabilitation Services**

Full Name of Authorized Representative: **Cheryl Fuller**

Title of Authorized Representative: **Director**

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

ASSURANCES

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

1. PUBLIC COMMENT ON POLICIES AND PROCEDURES:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. ADMINISTRATION OF THE PROVISION OF VR SERVICES:

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

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

B. IMPOSE NO DURATION OF RESIDENCE REQUIREMENT AS PART OF DETERMINING AN INDIVIDUAL'S ELIGIBILITY FOR VR SERVICES OR THAT

EXCLUDES FROM SERVICES UNDER THE PLAN ANY INDIVIDUAL WHO IS PRESENT IN THE STATE IN ACCORDANCE WITH SECTION 101(A)(12) OF THE REHABILITATION ACT .

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

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

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

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

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

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

H. COMPLY WITH THE REQUIREMENTS FOR THE CONDUCT OF SEMIANNUAL OR ANNUAL REVIEWS, AS APPROPRIATE, FOR INDIVIDUALS EMPLOYED EITHER IN AN EXTENDED EMPLOYMENT SETTING IN A COMMUNITY REHABILITATION PROGRAM OR ANY OTHER EMPLOYMENT UNDER SECTION 14(C) OF THE FAIR LABOR STANDARDS ACT OF 1938, AS REQUIRED BY SECTION 101(A)(14)OF THE REHABILITATION ACT.

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

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

DCCCXL. HAS DEVELOPED AND WILL IMPLEMENT,

. STRATEGIES TO ADDRESS THE NEEDS IDENTIFIED IN THE ASSESSMENTS; AND

A. STRATEGIES TO ACHIEVE THE GOALS AND PRIORITIES IDENTIFIED BY THE STATE, TO IMPROVE AND EXPAND VOCATIONAL REHABILITATION SERVICES FOR STUDENTS WITH DISABILITIES ON A STATEWIDE BASIS; AND

DCCCXLI. 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:

DCCCXLII. 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

DCCCXLIII. 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

Effective September 1, 2016, the Texas Department of Assistive and Rehabilitative Services (DARS) Division for Blind Services (DBS) and Division for Rehabilitation Services (DRS) Designated State Units (DSUs) transferred to the Texas Workforce Commission, which became the Designated State Agency (DSA). All references to the entity which constitutes the DSA in the modification to the VR portion of the Combined State Plan, including the Certifications and Assurances, were changed from Department of Assistive and Rehabilitative Services to Texas Workforce Commission.

In addition, Senate Bill 208, passed by the 84th Legislature, Regular Session (2015), requires the Texas Workforce Commission to integrate the two separate Vocational Rehabilitation programs- VR for individuals with visual impairments (Blind Services) and VR for individuals with other disabilities (Rehabilitation Services)- into a single program by October 1, 2017; therefore, the modification to the VR portion of the Combined State Plan represents a single VR portion rather than two separate portions.

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and the Vocational Rehabilitation Program— and also submit relevant information for any of the eleven partner programs it includes in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program.* If included, Combined State Plan partner programs are subject to the "common planning elements" in Sections II and III of that document, where specified, as well as the program-specific requirements for that program (available on www.regulations.gov for public comment). The requirements that a State must address for any of the partner programs it includes in its Combined State Plan are provided in this separate supplemental document. The Departments are not seeking comments on these program-specific requirements, which exist under separate OMB control numbers and do not represent requirements under WIOA. For further details on this overall collection, access the Federal eRulemaking Portal at http://www.regulations.gov by selecting Docket ID number ETA-2015-0006.

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

SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)

At minimum, in the SCSEP stand-alone submission and the SCSEP portion of the Combined State Plan, States should comprehensively cover the following elements.

A. ECONOMIC PROJECTIONS AND IMPACT

States must:

1. DISCUSS LONG-TERM PROJECTIONS FOR JOBS IN INDUSTRIES AND OCCUPATIONS IN THE STATE THAT MAY PROVIDE EMPLOYMENT OPPORTUNITIES FOR OLDER WORKERS. (20 CFR 641.302(D))(MAY ALTERNATIVELY BE DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN.)

Employment Opportunities for Older Workers

Employment opportunities for older workers (individuals 55 years of age and older) are closely tied to the long-term projections for jobs in industries and occupations previously discussed in the Plan's section on economic, workforce, and workforce development activities.

2. DISCUSS HOW THE LONG-TERM JOB PROJECTIONS DISCUSSED IN THE ECONOMIC ANALYSIS SECTION OF STRATEGIC PLAN RELATE TO THE TYPES OF UNSUBSIDIZED JOBS FOR WHICH SCSEP PARTICIPANTS WILL BE TRAINED AND THE TYPES OF SKILL TRAINING TO BE PROVIDED. (20 CFR 641.302(D))

Employment Opportunities versus Skills Held by Older Workers

The skill sets and behaviors previously sought by organizations are transforming, along with the pace of today's technological change. To balance the demands of tomorrow with the realities of today, employers and employees may need to rethink recruitment, retention, and development in the following areas:

- Short-term or moderate-term on-the-job training (OJT) requirements
- Hiring requirements, to ensure that education and experience requirements are attainable
- Transferable skill sets, in which a demonstrated ability to learn new skills is as important as an existing knowledge base
- Occupations occurring across several industries
- Appropriateness of working conditions, including virtual arrangements
- Job demands, which may stress flexibility and task collaboration over specialized skills

3. DISCUSS CURRENT AND PROJECTED EMPLOYMENT OPPORTUNITIES IN THE STATE (SUCH AS BY PROVIDING INFORMATION AVAILABLE UNDER §15 OF THE WAGNER-PEYSER ACT (29 U.S.C. 491-2) BY OCCUPATION), AND THE TYPES OF SKILLS POSSESSED BY ELIGIBLE INDIVIDUALS. (20 CFR 641.325(C))

Mature labor force participants composed 17.3 percent of the Texas workforce in 2010. The proportion of the Texas population age 55 and older is projected to continue to increase and account for a greater percent of the workforce. Moreover, employers across Texas agree that their baby boomer workers (born 1946 to 1964) are not retiring, for now. The trend reflects workers' decisions to postpone retirement because of fulfilling careers, longer lives, changing retirement plans and resources, or shrinking retiree health benefits. This trend has the potential to affect the workforce and the overall economy in numerous ways.

Education is a key aspect of a competitive workforce and the type of job opportunities that workers may pursue. Approximately 81 percent of the population over age 25 in Texas (12,723,801 individuals) had at least a high school diploma in 2010, and roughly 26 percent (4,091,770 individuals) had at least a bachelor's degree.

http://www.texasworkforce.org/development/wioa-csp-appendix-5-p-5.pdf

Although recent trends indicate that many mature workers will need or simply want to remain in the workforce, many of these individuals may require help identifying

transferable skills that lead to new career opportunities, as well as education and training to develop technical talent.

B. SERVICE DELIVERY AND COORDINATION

States must:

1. PROVIDE A DESCRIPTION OF ACTIONS TO COORDINATE SCSEP WITH OTHER PROGRAMS

This may alternatively be discussed in the State strategies section of the strategic plan, but regardless of placement in document, must include:

A. ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH WIOA TITLE I PROGRAMS, INCLUDING PLANS FOR USING THE WIOA ONE-STOP DELIVERY SYSTEM AND ITS PARTNERS TO SERVE INDIVIDUALS AGED 55 AND OLDER. (20 CFR 641.302(G), 641.325(E))

Coordination with Other Programs, Initiatives, and Entities

- Grantees will pursue both state- and local-level strategies to strengthen partnerships and working relationships in each of the categories below. TWC will:
- Seek Boards' cooperation in generating Older Worker Reports from WorkInTexas.com to facilitate participant recruitment by grantees' field coordinators;
- Encourage grantees and Boards to refine memoranda of understanding (MOUs) to specify roles and responsibilities for:
- Outreach to employers;
- Workforce services to seniors;
- Case management services for co-enrolled participants; and
- Other joint efforts as appropriate;

Encourage Boards to:

- Co-enroll seniors seeking full-time work under WIOA and/or other workforce programs, as appropriate; and
- Provide for the location of participant assistants at Workforce Solutions Offices when feasible, and train participant assistants as job developers to assist older job seekers; and
- Propose sessions on older worker issues and best practices at TWC's Annual Workforce Forum.

Grantees and Boards will:

- Provide information on and referrals to the services available at Workforce Solutions Offices;
- Negotiate community service assignments for senior participants at Workforce Solutions Offices, when feasible; and

- Negotiate for colocation of grantee staff at Workforce Solutions Offices, when possible. In certain instances, colocation may not be feasible, given Boards' limited office space and funding constraints.

Grantees will:

- List participant openings and staff openings in WorkInTexas.com;
- Assist job-ready participants to register online in WorkInTexas.com;
- Promote job seeker workshops and job clubs at Workforce Solutions Offices and, when feasible, Individual Employment Plans (IEPs) for participants; and
- Provide updates to Boards on SCSEP activities and successes in the local workforce development area (workforce area).

Boards will:

- Provide core workforce services to SCSEP participants and other older job seekers; and
- Provide current and future labor market information on industries, occupations, and required skill sets to older job seekers.

B. ACTIONS TO COORDINATE ACTIVITIES OF SCSEP GRANTEES WITH THE ACTIVITIES TO BE CARRIED OUT IN THE STATE UNDER THE OTHER TITLES OF THE OAA. (20 CFR 641.302(H))

Activities Carried Out under Other Titles of the Older Americans Act

Grantees will employ the following strategies to promote an ongoing dialogue and coordination with other providers serving seniors:

- Share information and resources relevant to senior health, support services, and older job seekers at Aging Texas Well Advisory Committee meetings
- Explore opportunities for improving the quality of training and access to training for community-based direct service workers caring for individuals with disabilities
- Attend the Area Agencies on Aging (AAAs) quarterly training meeting when feasible
- Contact regional specialists to schedule interpreters and other communication access services if assistance is needed for training and employment services with the deaf and hard of hearing

C. ACTIONS TO COORDINATE SCSEP WITH OTHER PRIVATE AND PUBLIC ENTITIES AND PROGRAMS THAT PROVIDE SERVICES TO OLDER AMERICANS, SUCH AS COMMUNITY AND FAITH-BASED ORGANIZATIONS, TRANSPORTATION PROGRAMS, AND PROGRAMS FOR THOSE WITH SPECIAL NEEDS OR DISABILITIES. (20 CFR 641.302(I))

Public and Private Entities and Programs Serving Older Americans

TWC will share items of interest with grantees on the employment of individuals with disabilities and accessible technology. Grantees will:

- Use 2-1-1 and other directories of service and support organizations to identify entities and programs in the community that refer and support seniors;
- Coordinate with local service providers, AAAs, and community stakeholders to assess needs and develop solutions for local transportation services;
- Participate in meetings, as appropriate, with senior service providers, both public and private; and

Communicate and coordinate with members of the local disability community on activities, resources, and services for seniors with disabilities in the workforce area.

Grantees will:

- Continue to use computer, adult basic education (ABE), high school equivalency, continuing education, and other targeted training courses at community colleges, taking advantage of course discounts for individuals 55 to 64 years of age and free classes for individuals 65 years of age and older;
- Work with Boards to encourage community colleges to create short-term education and training programs that are relevant for local targeted industries and high-priority occupations;
- Encourage community colleges to develop education and training programs relevant for older individuals' learning styles and pace; and continue two-way referrals to local VR programs.

D. ACTIONS TO COORDINATE SCSEP WITH OTHER LABOR MARKET AND JOB TRAINING INITIATIVES. (20 CFR 641.302(J))

Other Labor Market and Job Training Initiatives

The governor's Texas Industry Cluster Initiative focuses on advanced technologies and manufacturing, aerospace and defense, biotechnology and life sciences, information and computer technology, petroleum refining and chemical products, and energy clusters. Industry leaders have facilitated a great deal of research and discussion. SCSEP grantees will be seeking connections with these industries and initiatives to find work for older job seekers.

E. ACTIONS THE STATE WILL TAKE TO ENSURE THAT SCSEP IS AN ACTIVE PARTNER IN THE ONE-STOP DELIVERY SYSTEM AND THE STEPS THE STATE WILL TAKE TO ENCOURAGE AND IMPROVE COORDINATION WITH THE ONE-STOP DELIVERY SYSTEM. (20 CFR 641.335)

Improve and Expand Grantee Communications

The state's size—268,581 square miles—and travel costs limit regular face-to-face meetings. Grantees implement several strategies to increase and improve communication. TWC will schedule and facilitate grantee conference calls, as needed, to share information. Grantees will encourage field staff to connect with other field staff in the same workforce area and coordinate on efforts that strengthen partnerships with Boards and other local entities.

Other Education and Training Providers

SSAI has promoted the American Association for Community Colleges' "50 Plus Initiative" through SSAI's SCSEP subgrantee network. The initiative is designed to help low-income, older job seekers with workforce training and in making career changes to high-demand fields through programs offered at community colleges. TWC will seek to enhance these efforts by:

- Sharing information with grantees on literacy, English as a Second Language (ESL), and high school equivalency resources developed by TWC's Adult Education and Literacy (AEL) Department; and
- Attending relevant meetings and conferences, when possible, to identify training and vocational rehabilitation (VR) resources for seniors.

F. EFFORTS THE STATE WILL MAKE TO WORK WITH LOCAL ECONOMIC DEVELOPMENT OFFICES IN RURAL LOCATIONS.

Rural Local Economic Development Offices

The governor has designated TWC to administer the state's portion of SCSEP in rural communities. Along with providing oversight and technical assistance, TWC manages statewide planning and coordination of the state's grant application and performance reporting. TWC also supports SCSEP outreach efforts, including those engaging local economic development offices. In Texas, rural development is led by the governor's Rural Development Initiative, which assists rural communities and small businesses in creating and retaining jobs through business development and community strategic planning. The following organizations are also committed to promoting rural development initiatives in Texas:

- Texas Rural Foundation, a nonprofit corporation established to raise money from public, private, corporate, and other sources to finance health, community development, and economic development programs in rural Texas.
- Association of Rural Communities in Texas (ARCIT), a resource that promotes the policy of best practices in the delivery of public services to enhance the quality of life for all rural Texans.

2. DESCRIBE THE LONG-TERM STRATEGY FOR ENGAGING EMPLOYERS TO DEVELOP AND PROMOTE OPPORTUNITIES FOR THE PLACEMENT OF SCSEP PARTICIPANTS IN UNSUBSIDIZED EMPLOYMENT. (20 CFR 641.302(E)) (ALTERNATELY, THE STATE MAY DISCUSS THIS IN THE STATE STRATEGIES SECTION OF STRATEGIC PLAN IF SUBMITTING A COMBINED PLAN.)

Employer Outreach: SCSEP Staffing

SCSEP grantees in Texas network with employers and business and community organizations through local project directors. AARP fosters job matching and senior-friendly work environments for its members through employment specialists at 10 project offices located across Texas. SER appoints a national workforce development coordinator and regional coordinators to encourage employment of older workers. Additionally, EW staff members reach out to employers to support recruitment of older workers.

Employers as Customers

Grantees commit to assisting both job seekers and employers by helping to vet aptitude and fit of individuals for job responsibilities. As part of this process, grantees identify the qualities possessed by many older job seekers that employers seek:

- Commitment to doing quality work.
- Strong customer service orientation.
- Getting along with other employees.
- Dependability in times of crisis.
- Ability to pass a drug test.
- Consistent, reliable performance.

Once employers' needs are defined, staff is better able to promote the skills and competence of participants as trained workers who will add value to the business.

Grantees will:

- Pursue partnerships with employers that:
- Are developing job openings requiring the same or similar skill requirements possessed by older participants;
- Have successfully employed participants;
- Are listed on AARP's National Employer Team, which is committed to hiring seniors;
- Are seeking older participants, based on the local wisdom of Boards, business organizations, and others in the community; or
- Are identified in online labor market information as major employers in local industries with the greatest employment potential for participants;
- Publicize the success stories of former participants and their employers, thereby attracting other employers to consider hiring older job seekers; and
- Attend chamber of commerce and Board meetings and other economic development organizations to:
- Expand employer networks;
- Learn about job opportunities from employers; and
- Contact employers to determine the skills and qualities needed to be successful in these jobs.

3. DESCRIBE THE LONG-TERM STRATEGY FOR SERVING MINORITIES UNDER SCSEP. (20 CFR 641.302 (C))

In Texas, service to minority older workers at the local levels is based on a long-term strategy.

Grantees will:

- Monitor and share statewide and grantee-specific minority enrollment data and factors/barriers impacting minority recruitment;
- Use Texas grantees' conference calls to share statewide and grantee-specific factors impacting minority recruitment, share best practices, and brainstorm solutions to address recruitment/enrollment challenges;
- Ensure that field staff members are aware of the increasing proportion of Hispanic and Asian seniors in Texas;

- Analyze enrollment targets and geographic areas where performance is strong and where improvement is needed;
- Identify factors contributing to minority enrollment strengths and factors impeding minority enrollments;
- Share best practices for minority recruitment and provide technical assistance to grantee's Texas field staff;
- Target outreach to specific underserved minority groups in counties where they are a larger proportion of the SCSEP-eligible population in the grantee's service area; and
- Where Hispanic enrollments are low, ensure that recruitment materials are in Spanish and consider hiring Hispanic staff or using Hispanic participant staff.

4. LIST NEEDED COMMUNITY SERVICES AND THE EXACT PLACES WHERE THESE SERVICES ARE MOST NEEDED. SPECIFICALLY, THE PLAN MUST ADDRESS THE NEEDS AND LOCATION(S) OF THOSE INDIVIDUALS MOST IN NEED OF COMMUNITY SERVICES AND THE GROUPS WORKING TO MEET THEIR NEEDS. (20 CFR 641.330)

Texas develops statewide data on priority community needs from three state agencies:

- Texas Health and Human Services Commission (HHSC)—needs requested by callers to the state's 2—1—1 system for each of the 25 Area Information Centers;
- Texas Department of Housing and Community Affairs (TDHCA)—priority needs identified by 35 Community Services Block Grant (CSBG) entities as part of their annual plans; and
- Texas Department of Aging and Disability Services (DADS)—priority needs for seniors identified by each of the 28 AAAs.

The table below summarizes the needs most commonly requested to the 2—1—1 system, including assistance with paying utility bills and rent; food assistance through the Supplemental Nutrition Assistance Program (SNAP), food pantries, and organizations operating food voucher systems; and Medicaid assistance. Priority needs will vary with the workforce area. The Concho Valley workforce area, for example, had many requests for low—cost or free dental care, homeless shelters, and community clinics. For the Cameron County and Lower Rio Grande Valley workforce areas, Temporary Assistance for Needy Families (TANF) applications and Medicare savings were frequently requested.

Priority Needs Based on Requests Received by 2—1—1 Area Information Centers (AICs)

Type of Need	No. of AICs Listing as Priority 1—5 Need	No. of AICs Listing as Priority 6—10 Need
Utility Bill Assistance	25	0

Type of Need	No. of AICs Listing as Priority 1—5 Need	No. of AICs Listing as Priority 6—10 Need
Food Stamps	18	2
Food Pantries/Food Vouchers	17	6
Rent Payment Assistance	17	7
Medicaid	11	4
Tax Preparation	4	7
Dental Care	2	8
Housing Authorities	2	5
Prescription Expense Assistance	2	4
TANF Applications	2	2
Money for Gasoline	2	0
Community Clinics	1	10
Homeless Shelters	1	8
Low—Income, Subsidized Rental Housing	1	3
Adult Protective Services	1	1
Adult State/Local Health Insurance	1	1
Medicare Savings Program	1	1
Special Needs Registries	1	1
Weatherization Programs	1	0
Tiers Transfer	1	0
Information and Referral	1	0
Benefits Assistance	1	0
Clothing	1	0
Holiday Gifts/Toys	0	7
Medical Transportation	0	6
Child Care Subsidies	0	3
Medicare	0	2
Job Assistance Center	0	2

Type of Need	No. of AICs Listing as Priority 1—5 Need	No. of AICs Listing as Priority 6—10 Need
Women, Infants, and Children	0	2
Legal Aid	0	2
Immunizations	0	2
Municipal Police	0	1
Fans and Air Conditioners	0	1
Community Shelter	0	1
Physician Referrals	0	1
SSDI Applications	0	1
Social Security Numbers	0	1
Section 8 Housing Voucher	0	1
Family Planning	0	1

CSBG priorities are listed in the following table. These include housing, employment assistance, health care, utility bill assistance, adult education and training, transportation, and food assistance. Housing authorities, Workforce Solutions Offices, public and nonprofit clinics, high school equivalency and job training programs, food pantries and food voucher programs, and organizations providing assistance with paying utility bills and providing low— or no—cost transportation are all good candidates for needed community services. Each entity has additional priority needs that vary from area to area.

Priority Needs Identified by Community Services Block Grant Entities

Type of Need	No. of CSBGs Listing as Priority Need
Housing	26
Employment Assistance	23
Health Care	21
Utility Bill Assistance	17
Education and Training—Job Skills Training, GED, ESL	16

Type of Need	No. of CSBGs Listing as Priority Need
Transportation	14
Food Pantries/Vouchers/Support	13
Home Repairs and Weatherization	8
Affordable Child Care	6
Prescription Expense Assistance	5
Health Insurance	3
Economic Development	3
Youth Programs and Services	3
Homelessness Assistance	3
Programs for Seniors	3
Clothing	3
Information and Referrals	2
Financial Literacy	2
Outreach about Available Services	2
Counseling	2
Domestic Violence Survivor Support	2
Street Improvements	1
Crime Awareness	1
Drug Abuse Awareness	1
Lack of Public Parks	1
Gasoline Money	1
Income Tax Preparation	1

AAAs' priority needs for seniors, listed below, include transportation, home—delivered meals, legal assistance, congregate meals, coordination of care, information referral, and in—home respite care for caregivers. Additional host agencies could be recruited from public and nonprofit entities that are providing these services or are seeking human resources to provide these services.

TWC will share with each grantee the needs identified by the 2—1—1 entities, CSBGs, and AAAs in the grantee's service area. Grantees will also continue to gather input from local government officials and informal networks with colleagues in local organizations and agencies.

Priority Needs of Seniors Identified by Area Agencies on Aging

Type of Need	No. of AAAs Listing as Priority Need
Transportation	21
Home—Delivered Meals	20
Legal Assistance	15
Congregate Meal	14
Care Coordination	10
Information Referral and Assistance	10
Caregiver Respite Care—In—Home	9
Health Maintenance	8
Legal Awareness	8
Ombudsman	7
Residential Repair	7
Caregiver Support Coordination	6
Area Agency Administration	5
Caregiver Information Services	5
Personal Assistance	5
Emergency Response	4
Evidence—Based Intervention to Promote Wellness	4
Homemaker	4
Caregiver Education and Training	3
Utility Bill Assistance	3
Adult Day Services	2
Data Management	2
Senior Center Support	2
Community Clinics	1
Food Assistance	1

Type of Need	No. of AAAs Listing as Priority Need
Health Screening/Monitoring	1
Housing	1
Nutrition Education (Nutrition Services)	1
Participant Assessment	1
Rent Assistance	1

Identifying Organizations and Entities Addressing Priority Needs

Community resource guides in hard copy and online, including the 2—1—1 website, are a starting point for grantees to identify agencies and organizations that address priority needs. One promising online resource, Texas Connector, is a statewide online database developed by the OneStar Foundation. The database includes 2—1—1 resources and GuideStar, USA, Inc., information on nonprofit organizations in Texas. Texas Connector is unique because its mapping tool allows users to:

- Outline an area on an online map—a neighborhood, a county, or cluster of counties;
- Map all the entities and organizations providing services in the outlined area;
- Access basic demographic information about the area;
- Map where specific resources such as food banks or health clinics are located; and
- Print a report with the selected information.

Texas Connector locates support resources and identifies potential host agencies that address the community's priority needs and may assist with recruiting participants.

5. DESCRIBE THE LONG-TERM STRATEGY TO IMPROVE SCSEP SERVICES, INCLUDING PLANNED LONG-TERM CHANGES TO THE DESIGN OF THE PROGRAM WITHIN THE STATE, AND PLANNED CHANGES IN THE USE OF SCSEP GRANTEES AND PROGRAM OPERATORS TO BETTER ACHIEVE THE GOALS OF THE PROGRAM. THIS MAY INCLUDE RECOMMENDATIONS TO THE DEPARTMENT AS APPROPRIATE. (20 CFR 641.302(K))

The goal of SCSEP in Texas is to serve eligible participants through training opportunities that both improve or build skill levels for available jobs in the community. The long-term goal is to ensure that the job matching is appropriate for both the employer and older worker so that the relationship will be retained and benefit the employer, the older worker, and the state's economy. Partnerships for integrating services are crucial to these strategies. The SCSEP service provider's success is measured by its attainment of negotiated goals for serving the older worker population, increases in services within the network of nonprofits and public agencies within communities, and cultivation of skilled workers for employers. TWC reviews performance results and offers assistance and training in areas needing improvement.

The state is committed to serve all eligible participants, including minorities. SCSEP will strive to improve outreach efforts and services for this population. Recommendations include the following:

- Help SCSEP participants attain the skills to better fill employment needs;
- Work with and expand nonprofit agencies' efforts to provide meaningful community service;
- Texas grantees will increase the frequency of formal collaboration among each other to:
  - Problem solve and evaluate alternative solutions to issues;
  - Share best practices and performance progress;
  - Plan and coordinate collaborative activities; and
  - Explore areas for collaboration likely to improve or enhance SCSEP services in the state.
- Work with businesses and nonprofit agencies to develop training assignments in which today's skills are learned on-the-job and unsubsidized employment will be the end result;
- Assist the business community in attracting, employing, and retaining older workers;
- Continue to actively partner with Boards;
- Expand referrals to DADS;
- Place emphasis on creative partnerships with groups that advocate and provide services to veterans and individuals with disabilities; and
- Expand relationships with chambers of commerce.

6. DESCRIBE A STRATEGY FOR CONTINUOUS IMPROVEMENT IN THE LEVEL OF PERFORMANCE FOR SCSEP PARTICIPANTS' ENTRY INTO UNSUBSIDIZED EMPLOYMENT, AND TO ACHIEVE, AT A MINIMUM, THE LEVELS SPECIFIED IN OAA SECTION 513(A)(2)(E)(II). (20 CFR 641.302(F))

The state's strategy for continuous improvement in the level of SCSEP participants' placements in unsubsidized employment focuses on fostering a multitalented workforce.

The technical and occupational skills of many SCSEP participants often lag behind today's employment requirements. Qualities offered by the older worker, such as work ethic and reliability, are valued by employers, but the need for technical skills is also a concern. Training and retraining of SCSEP participants is designed to help their employability.

SCSEP service providers seek to gather input from the business community, community leaders, host agency supervisors, the participants themselves, and local government officials about the job skill needs within their organizations and community. This effort includes networking at chamber of commerce events and other business organizations' functions. The information gathered enables development of meaningful training opportunities for older workers and suitable matches for unsubsidized work.

Recommendations include the following:

- Place SCSEP "graduates" in industries and occupations with high growth or substantial employment need;

- Research labor market information and consult with Boards and their contractors, economic development agencies, chambers of commerce, and local business partners to identify targeted industries and high-growth occupations appropriate for seniors, local employers that are hiring, and skills and qualities needed to be successful in these jobs;
- Strengthen initial assessments of participant skills, knowledge, interests, aptitudes, and qualities, and define career objectives that are relevant for the participant's interests and abilities and local business needs;
- Assess the participant's barriers and skills gaps to create IEPs with timelines for OJT, specialized training, and support services;
- Ensure host agency assignments provide skills training that is relevant for participant career objectives and employer needs;
- Develop effective relationships with participants and monitor their training progress so grantees can gauge when participants are ready to start looking for employment and intervene or revise IEPs;
- Promote a motivated attitude through counseling and monitoring participants;
- Coordinate with Workforce Solutions Offices to provide effective job search preparation and support;
- Require participants to register with a Workforce Solutions Office and with WorkInTexas.com;
- Follow up frequently with participants in on-the-job experience arrangements to ensure that participants have the skills, confidence, and qualities to be successful in the job;
- Intervene early, as needed, to resolve any obstacles to successful employment; and
- Respect participants' right of refusal of a job when they feel unprepared or unsuited for the job.

<u>Grantees will implement the following strategies:</u>

- Continue to remind participants and host agencies during initial orientations and throughout participants' SCSEP tenure that SCSEP is a temporary training program, not an employment program.
- Encourage participants to take advantage of online advice to older job seekers, such as AARP.org, Monster.com, and Quintscareer.com.

Additionally, TWC provides online resources developed by its Labor Market and Career Information Department:

- Texas Career Alternatives Resource Evaluation System (Texas CARES) (http://www.texascaresonline.com); and
- Texas WorkPrep Learning Management System (http://www.texasworkprep.com/texasworkprep.htm), which includes these online courses: Texas Job Hunter's Guide, Succeed at Work, and Your Next Job

<u>Specialized Training Plans</u>

- Pursue low-cost or no-cost computer training for participants before they report to their community service assignments or early in their assignments. Free or low-cost training is often available at libraries, Workforce Solutions Offices, school districts' community education programs, Goodwill, and community colleges. AARP's Virtual Career Network (VCN) - SCSEP Checklist and EW's *JobReady* provide skills and knowledge training for a variety of occupations, software training that crosses most industries, and testing and certification for skills learned.
- Pursue agreements with local employers for on-the-job experience.
- Pursue specialized training opportunities in which a job opening is not required by employers. Participants attend training for potential placement.
- Pursue certificate training opportunities for high-growth occupations and industries. For example, teacher assistant classroom training followed by six-week internships leading to a certificate and employment offer from a local school district.
- Identify relevant curricula for short-term training that is free or low-cost, and encourage local training providers, such as community colleges, to offer training in these areas.

Pursue or provide transferable workplace skills training. For example, SER provides 30 hours of training for participants who are close to being job ready but who need a little more self-assurance and motivation. Community colleges and Workforce Solutions Offices will be encouraged to offer more transferable workplace skills courses.

Performance Measures

As a result of the Older Americans Act Reauthorization of 2016, TWC adopted new SCSEP performance measures to align with WIOA. The following is a list of the new performance measures and a brief description of the strategies that national and state grantees will use to successfully transition to the new performance measures.

Percentage of participants who exited during the reporting period who are employed in unsubsidized employment during the 2nd quarter after the exit.

National Grantees

Strategy: The grantees will conduct follow-up with exited SCSEP participants monthly and quarterly to maintain a consistent contact with placed participants. The grantees will also ensure the participants' files are updated and properly documented in SPARQ.

Grantees will conduct job development activities to increase the percentage of entered employment and enroll participants with limited English proficiency in English Second Language (ESL) classes.

Barriers: SCSEP participants do not respond to follow-up emails and phone calls. In addition, grantees do not have access to unemployment data.

State Grantee

Strategy: Sub-grantee will increase effective communication and follow-ups with participants after the exit of the program. Sub-grantee will continue to conduct individualized and intensive assessment to assist participants to focus on their employment

goals. Also, sub grantee will continue to focus on older worker friendly employers to develop job postings for specific employment availability in rural communities.

Barrier: Communication after the exit to the participants can be challenging if the contact information is no longer valid.

Percentage of participants who exited during the reporting period who are employed in unsubsidized employment during the 4th quarter after the exit.

National Grantees

Strategy: The grantees will communicate to the SCSEP participants the purpose of conducting follow-ups during orientation and exit appointments and remind the participants about the importance of follow-ups during the SCSEP program.

Grantees will continue to follow-up with the participants with emails, phone calls, and engage with participants who have not have had contact with the program in over a year.

Barrier: Communication with the participants after the exit can be challenging if the contact information is no longer valid.

State Grantee

Strategy: Sub grantee will increase effective communication and follow-ups with participants to offer support and ongoing job search assistance as needed. During the follow-ups, sub grantee staff will be able to identify challenges initially so they can provide support services and job referrals to participants.

Barrier: Communication with the participants after the exit can be challenging if the contact information is no longer valid.

Satisfaction of employers with their experiences and services provided

National Grantees

Strategy: Grantees will conduct follow-ups to encourage employers to complete and return surveys during pre- and post-placement.

Grantees will maintain good customer service practices and continuous communication with employers.

Barrier: Employers do not respond to requests to complete and return survey.

State Grantee

Strategy: State sub grantee will continue to recruit older worker friendly employers and educate them about the benefits of hiring older workers. We will also continue to work with employers to identify their employment needs so our sub grantee can update the curriculum in their Job Ready system.

Barrier: Employers are hesitant to participate in SCSEP program due to the amount of paperwork.

Satisfaction of the host agencies with their experiences and the services provided.

National Grantees

Strategy: Grantees will continue to provide effective communication and build partnership with host agencies based on mutual respect, understanding, and support. They will also work diligently and consistently to encourage host agencies to complete and return surveys.

Barrier: Host agencies do not respond at the request to complete and return surveys.

State Grantee

Strategy: Sub grantee will continue to engage with host agencies to develop participants' goals and to provide individualized training for assignments and potential job postings within the host agencies. An effective correlation between the SCSEP participant and the host agency is essential to ensure host agency satisfaction.

Barrier: Host agencies do not respond to complete and return surveys.

Satisfaction of the participants with their experiences and the services provided

National Grantees

Strategy: Grantees will continue to provide assessments to assist participants to create and achieve their goals with appropriated assignments and support services. Also, grantees will maintain effective communication with the participants during and after exit from the SCSEP program.

Barrier: Participants do not respond to requests to complete and return surveys.

State Grantee

Strategy: State sub grantee will begin with thorough assessment of skills and barriers to better understand the needs of the SCSEP participants. There will be an increase in communication and follow-ups with participants during the SCSEP program and after the exit from the SCSEP program to ensure participants' satisfaction and their needs are met in the program.

Barrier: Unrealistic expectations of employment goals can cause dissatisfaction with SCSEP participants who only want minimal training.

C. LOCATION AND POPULATION SERVED, INCLUDING EQUITABLE DISTRIBUTION

States must:

1. DESCRIBE THE LOCALITIES AND POPULATIONS FOR WHICH PROJECTS OF THE TYPE AUTHORIZED BY TITLE V ARE MOST NEEDED. (20 CFR 641.325 (D))

RURAL AREAS

An estimated 19.4 percent of the state's SCSEP-eligible population is rural. SCSEP's definition of *rural* is based on Rural Urban Commuting Area (RUCA) codes, defined at the census tract level. Four workforce areas (Northeast Texas, West Central Texas, Deep East Texas, and Golden Crescent) are mostly rural. One workforce area, Middle Rio Grande, is 100 percent rural. Seventy-seven counties, or almost one-third of the state's counties, have 75 percent or more rural populations. Fifty-eight counties have 100 percent rural populations. At the opposite end of the spectrum, the populations in three one-county workforce areas (Tarrant County, Greater Dallas, and Capital Area) are 100 percent urban.

STRATEGIES TO ADDRESS RURAL SERVICE DELIVERY CHALLENGES

The sheer size of Texas—268,581 square miles—makes rural areas a particularly significant challenge to service providers. The state's widest east-west expanse is 801 miles, and the maximum north-south distance is 773 miles. The extent of the state's rural areas is also underscored by the fact that 95.7 percent of the state's land area is rural.

Grantees' greatest obstacles to providing SCSEP services in rural areas and assisting participants in finding unsubsidized jobs are all related to shortages—of resources, services, and jobs—particularly in more isolated areas.

URBAN/RURAL DISTRIBUTION OF SCSEP-ELIGIBLE POPULATION IN WORKFORCE AREAS

WorkforceArea	Urban SCSEP-Eligible Population	Rural SCSEP-Eligible Population	Total SCSEP-Eligible Population	% Rural Population
Statewide	655,343	157,659	813,002	19.4%
Alamo	70,351	6,298	76,649	8.2%
Brazos Valley	5,799	3,056	8,855	34.5%
Cameron County	25,060	1,190	26,250	4.5%
Capital Area	20,219	0	20,219	0.0%
Central Texas	9,573	2,647	12,220	21.7%
Coastal Bend	21,157	13,930	35,087	39.7%
Concho Valley	4,731	1,914	6,645	28.8%
Dallas	65,354	0	65,354	0.0%
Deep East Texas	4,622	14,201	18,823	75.4%
East Texas	19,836	15,186	35,022	43.4%
Golden Crescent	3,869	4,106	7,975	51.5%
Gulf Coast	150,465	11,288	161,753	7.0%
Heart of Texas	10,315	3,508	13,823	25.4%
Lower Rio Grande	43,225	0	43,225	0.0%
Middle Rio Grande	0	12,534	12,534	100.0%
North Central	29,620	13,614	43,234	31.5%
North East Texas	4,343	9,038	13,381	67.5%

WorkforceArea	Urban SCSEP-Eligible Population	Rural SCSEP-Eligible Population	Total SCSEP-Eligible Population	% Rural Population
North Texas	4,855	2,835	7,690	36.9%
Panhandle	7,688	6,842	14,530	47.1%
Permian Basin	8,559	7,274	15,833	45.9%
Rural Capital Area	13,559	4,312	17,871	24.1%
South Plains	9,179	5,770	14,949	38.6%
South Texas	11,254	5,915	17,169	34.5%
Southeast Texas	15,241	0	15,241	0.0%
Tarrant	42,573	0	42,573	0.0%
Texoma	5,075	2,431	7,506	32.4%
Upper Rio Grande/ Borderplex	43,661	1,148	44,809	2.6%
West Central Texas	5,160	8,622	13,782	62.6%

URBAN/RURAL DISTRIBUTION OF SCSEP-ELIGIBLE POPULATION IN GRANTEE SERVICE AREAS

PY'13 Grantee Service Area	Urban Population	Rural Population	Total Population	% Rural Population
AARP	451,088	11,704	462,792	2.53%
EW	64,447	46,880	111,327	42.11%
NAPCA	16,395	0	16,395	0.0%
SER	101,789	3,146	104,935	3.00%
SSAI	21,847	21,201	43,048	49.25%
State Grantee	97,552	72,042	169,594	42.48%
Other (counties not served by SCSEP)	625	2,686	3,311	81.12%
Total	754,283	157,659	911,942	17.29%

LACK OF ADEQUATE TRANSPORTATION

Lack of adequate transportation significantly hinders SCSEP service delivery in rural areas. In its annual plans, AAAs identified transportation as the number-one priority need for seniors. The minimal transportation available in small towns is on-demand assistance geared toward individuals with disabilities and transporting individuals to medical appointments. Although most SCSEP participants drive their own cars, for those who do not have cars or are no longer able to drive, the lack of transportation poses a significant barrier to SCSEP participation and to finding and retaining unsubsidized employment.

To address rural transportation needs, grantees will:

- Seek to place participants and rotate participants in community service assignments as close as possible to their residences;
- Seek host agency assignments that have transportation resources (faith-based organizations providing community services may be able to serve as host agencies and provide transportation);
- Contact school districts and child care networks/facilities to determine in which rural areas the school bus is a feasible transportation alternative for SCSEP participants;
- Become more knowledgeable about state and local transportation planning processes and how to quantify and accurately characterize transportation needs of older individuals, including older job seekers and older workers; and
- Work with Boards to identify any existing collaborations with rural community transportation providers and planners to address local transportation needs.

LIMITED ACCESS TO COMPUTERS

A second resource in short supply that hinders rural SCSEP services is access to computers and the Internet. Low-income older job seekers often have limited or no computer skills. These skills are not only required by employers but important for participants to access the Internet, register in WorkInTexas.com and other online job search databases, and develop Internet search skills. Grantees' field staff members, including participant staff, need access to computers for data collection and communications in a state with such extensive rural areas. Improving access to computers in rural areas will increase the amount of computer and online training available for participants. To address rural technology needs, grantees will contact local businesses, governmental agencies, public libraries, and community- and faith-based organizations regarding ongoing computer and Internet access for participants on an ongoing basis.

LIMITED HOST AGENCIES

Many rural areas have few nonprofit organizations and governmental agencies to serve as host agencies for participants. Limited rural transportation options compound the challenges of identifying a sufficient number of host agencies and organizations with diverse skills training opportunities. More host agencies are needed that can provide general office skills training, computer skills training, and job-specific skills training.

To increase the number of rural host agencies and the diversity of skills training opportunities for participants, grantees will:

- Contact chambers of commerce and faith-based and community-based organizations to identify more potential host agencies;
- Use Texas Connector to identify nonprofit organizations and agencies addressing priority community needs that might serve as host agencies; and
- Work with local agencies and seek community partners to address local transportation solutions to increase the mobility of participants and their access to host agencies.

LACK OF SPECIALIZED SKILLS TRAINING

Rural communities often lack opportunities for skills training to supplement participants' OJT service assignments. Increasing access to laptops, desktop computers and iPads coupled with online training is a top priority for most SCSEP grantees in rural areas of Texas. As of October 1, 2015, AARP uses the VCN - SCSEP Checklist, developed in partnership with the AARP Foundation, the U.S. Department of Labor, and the American Association of Community Colleges (AACC). EW hosts the *JobReady* tool, supported by the National Business Services Alliance. Both tools offer a variety of online assessments, skills training, and certificates to measure competency levels for training in such fields as health care, sales, customer service, food service, child care, and hospitality. In some workforce areas, occupational demand exists in landscaping services, alternative fuel production, and unarmed security areas.

SER has used several contractors to provide participants with specialized skills training and certificates of completion on a variety of topics and skill areas, including financial literacy in English and Spanish, entrepreneurship, food service, clerical skills, customer service, vocational English, intensive job search, assessing career options, and job-readiness training. Additionally, a SER contractor has provided rural participants with mobile computer training.

To expand opportunities for participants' specialized training, grantees will:

- Explore all formats and technologies for low-cost additional training in the most important skills areas identified by local employers;
- Work with local community colleges and Workforce Solutions Offices to expand low-cost or no-cost skills training tailored to local employers' skill needs when appropriate; and
- Seek opportunities with local employers to access low-cost or no-cost, short-term skills training that is appropriate for seniors and the local job market.

When an employer does not have an immediate job opening, participants can attend specialized training for high-growth occupations so that when the opportunity arises, participants will have the requisite skills. For example, AARP Foundation SCSEP has trained participants in electronic health records and currently pilots a dual-occupation certification program with MedCerts for participant placement as a Certified Medical Administrative Assistant and Pharmacy Technician. AARP's San Antonio SCSEP office works with the city and CVS Pharmacy. AARP's Austin office works with the Travis County Sherriff in training for administrative services and other opportunities.

LACK OF BASIC SKILLS TRAINING

An additional resource that is lacking in most rural areas is basic skills training. Many rural seniors have less than a ninth-grade education and need to improve their language and mathematics skills.

In May 2013, the governor signed Senate Bill (SB) 307, 83rd Texas Legislature, Regular Session (2013), which transferred responsibility for adult education from the Texas Education Agency (TEA) to TWC. A competitive procurement process was used to select AEL providers in 2014. TWC shares links to online directories of AEL providers and relevant Internet links with grantees. To develop more opportunities for basic skills training, grantees will:

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- Use software and online sources to access basic skills training. AARP's VCN and EW's JobReady provide some basic skills training. Teknimedia is a software package purchased by EW and other organizations to provide basic skills training.

LACK OF JOBS

The lack of jobs in rural areas makes it more difficult for grantees to help participants—even those who are "job ready"—obtain unsubsidized jobs.

To expand rural participants' job opportunities, grantees will:

- Explore the feasibility of self-employment with participants, and consult with Workforce Solutions Offices, the Small Business Administration, Senior Core of Retired Executives, and other organizations about the most promising types of microenterprise businesses in the workforce area, assessment of an individual's suitability for self-employment, available local and online resources—including mentoring support—and other feasibility considerations; and
- Share results, challenges, ideas, and opportunities during grantee conference calls.

SPECIAL POPULATIONS

Focusing on Special Populations

Grantees work with local agencies to target recruitment activities in underserved areas and in areas of higher concentrations of minorities and most-in-need populations. Targeted recruitment efforts are based on census data, local and state demographic data, and Texas population and aging statistics.

Grantees monitor enrollment levels of most-in-need populations at least quarterly. Field staff members are trained to profile and manage their territories so they are able to track and plan for exits, plan for adequate recruitment activity to fill vacancies quickly, and seek to ensure that special populations are adequately served.

Recruitment Methods for Special Population Groups

Grantees often need to go beyond traditional recruitment methods to connect with and enroll individuals from special population groups. General outreach strategies for special populations include:

- Networking with and providing recruitment brochures to community- and faith-based organizations that serve and advocate for these special population groups; and
- Visiting locations and displaying recruitment brochures and flyers where priority populations may congregate, such as laundries, senior centers, nutrition centers, health clinics, and other health care providers.

In addition to general outreach methods for special populations, grantees use the following recruitment methods to reach specific populations:

Veterans and qualified spouses

- Networking with local veteran representatives at Workforce Solutions Offices, county judges, senior centers, AAAs, and HHSC
- Contacting and making presentations to local veterans' organizations, veteran medical clinics, and other veteran-related organizations in the community

Individuals with disabilities

- Networking with DARS, HHSC, SSA, and AAAs
- Contacting disability navigators or former disability navigators at Workforce Solutions Offices to identify local disability advocates and relevant community organizations serving or supporting individuals with disabilities
- Contacting DARS' Centers for Independent Living (located in 27 Texas cities)

Individuals who are age-eligible but not receiving benefits under SSA Title II—Contacting SSA, HHSC, and Workforce Solutions Offices to identify these individuals.

Individuals in areas with persistent unemployment and limited employment prospects—Conducting outreach in counties classified as having persistent unemployment: Willacy, Hidalgo, Starr, Maverick, Zavala, and Presidio, along the Rio Grande; Jasper, Newton, and Sabine in southeast Texas; Matagorda on the Gulf Coast; and Morris in northeast Texas.

Individuals who are English-language learners (ELLs).

Advertising through local media, including Spanish-language newspapers and radio stations.

Networking with local churches, Hispanic/Latino chambers of commerce, restaurants and other businesses that cater to the Hispanic/Latino community, and other Hispanic/Latino or ethnic community organizations.

Hiring staff members who speak Spanish or Asian languages to conduct outreach directly.

Translating recruitment materials into Spanish or Asian languages.

Individuals with low literacy skills—Networking with adult literacy providers, community leaders, churches, and other community organizations.

Individuals who live in rural areas—Using word of mouth through community leaders and community networks, including current and former participants and host agencies

Individuals with low employment prospects:

- Contacting Workforce Solutions Offices, veterans organizations, and other community organizations
- Visiting community centers
- Networking with safety net organizations like food banks

Individuals who used WIA or WIOA services but failed to find jobs—Contacting Workforce Solutions Offices to identify and reach out to these individuals

Individuals who are homeless or at risk of homelessness—Networking with local homeless shelters, homeless coalitions, housing authorities, food banks, churches, and Workforce Solutions Offices

Individuals with incomes at or below poverty.

- Networking with SSA, HHSC, Workforce Solutions Offices, and AAAs.
- Contacting churches, food banks, thrift shops, and local housing authorities.

Individuals who are socially, geographically, linguistically, or culturally isolated and at risk of not being able to live

- Seeking referrals through HHSC, DARS, SSA, and Workforce Solutions Offices
- Networking with Meals on Wheels programs for seniors, churches, and local community organizations to identify and connect with these individuals
- Talking with roadside business owners in geographically isolated areas to identify where potentially eligible seniors live

Individuals who are minorities.

- Using recruitment methods listed for individuals who are ELLs
- Networking with ministers and leaders at churches with predominantly minority congregations
- Making presentations at minority agencies, community centers, and chambers of commerce serving minority communities
- Visiting food banks, restaurants, senior centers, and other organizations in minority neighborhoods
- Networking with HHSC, SSA, AAAs, and Workforce Solutions Offices

RURAL AREAS

An estimated 19.4 percent of the state's SCSEP-eligible population is rural. SCSEP's definition of *rural* is based on Rural Urban Commuting Area (RUCA) codes, defined at the census tract level. Four workforce areas (Northeast Texas, West Central Texas, Deep East Texas, and Golden Crescent) are mostly rural. One workforce area, Middle Rio Grande, is 100 percent rural. Seventy-seven counties, or almost one-third of the state's counties, have 75 percent or more rural populations. Fifty-eight counties have 100 percent rural populations. At the opposite end of the spectrum, the populations in three one-county workforce areas (Tarrant County, Greater Dallas, and Capital Area) are 100 percent urban.

STRATEGIES TO ADDRESS RURAL SERVICE DELIVERY CHALLENGES

The sheer size of Texas—268,581 square miles—makes rural areas a particularly significant challenge to service providers. The state's widest east-west expanse is 801 miles, and the maximum north-south distance is 773 miles. The extent of the state's rural areas is also underscored by the fact that 95.7 percent of the state's land area is rural.

Grantees' greatest obstacles to providing SCSEP services in rural areas and assisting participants in finding unsubsidized jobs are all related to shortages—of resources, services, and jobs—particularly in more isolated areas.

URBAN/RURAL DISTRIBUTION OF SCSEP-ELIGIBLE POPULATION IN WORKFORCE AREAS

WorkforceArea	Urban SCSEP-Eligible Population	Rural SCSEP-Eligible Population	Total SCSEP-Eligible Population	% Rural Population
Statewide	655,343	157,659	813,002	19.4%
Alamo	70,351	6,298	76,649	8.2%
Brazos Valley	5,799	3,056	8,855	34.5%
Cameron County	25,060	1,190	26,250	4.5%
Capital Area	20,219	0	20,219	0.0%
Central Texas	9,573	2,647	12,220	21.7%
Coastal Bend	21,157	13,930	35,087	39.7%
Concho Valley	4,731	1,914	6,645	28.8%
Dallas	65,354	0	65,354	0.0%
Deep East Texas	4,622	14,201	18,823	75.4%
East Texas	19,836	15,186	35,022	43.4%
Golden Crescent	3,869	4,106	7,975	51.5%
Gulf Coast	150,465	11,288	161,753	7.0%
Heart of Texas	10,315	3,508	13,823	25.4%
Lower Rio Grande	43,225	0	43,225	0.0%
Middle Rio Grande	0	12,534	12,534	100.0%
North Central	29,620	13,614	43,234	31.5%
North East Texas	4,343	9,038	13,381	67.5%

WorkforceArea	Urban SCSEP-Eligible Population	Rural SCSEP-Eligible Population	Total SCSEP-Eligible Population	% Rural Population
North Texas	4,855	2,835	7,690	36.9%
Panhandle	7,688	6,842	14,530	47.1%
Permian Basin	8,559	7,274	15,833	45.9%
Rural Capital Area	13,559	4,312	17,871	24.1%
South Plains	9,179	5,770	14,949	38.6%
South Texas	11,254	5,915	17,169	34.5%
Southeast Texas	15,241	0	15,241	0.0%
Tarrant	42,573	0	42,573	0.0%
Texoma	5,075	2,431	7,506	32.4%
Upper Rio Grande/ Borderplex	43,661	1,148	44,809	2.6%
West Central Texas	5,160	8,622	13,782	62.6%

URBAN/RURAL DISTRIBUTION OF SCSEP-ELIGIBLE POPULATION IN GRANTEE SERVICE AREAS

PY'13 Grantee Service Area	Urban Population	Rural Population	Total Population	% Rural Population
AARP	451,088	11,704	462,792	2.53%
EW	64,447	46,880	111,327	42.11%
NAPCA	16,395	0	16,395	0.0%
SER	101,789	3,146	104,935	3.00%
SSAI	21,847	21,201	43,048	49.25%
State Grantee	97,552	72,042	169,594	42.48%
Other (counties not served by SCSEP)	625	2,686	3,311	81.12%
Total	754,283	157,659	911,942	17.29%

LACK OF ADEQUATE TRANSPORTATION

Lack of adequate transportation significantly hinders SCSEP service delivery in rural areas. In its annual plans, AAAs identified transportation as the number-one priority need for seniors. The minimal transportation available in small towns is on-demand assistance geared toward individuals with disabilities and transporting individuals to medical appointments. Although most SCSEP participants drive their own cars, for those who do not have cars or are no longer able to drive, the lack of transportation poses a significant barrier to SCSEP participation and to finding and retaining unsubsidized employment.

To address rural transportation needs, grantees will:

- Seek to place participants and rotate participants in community service assignments as close as possible to their residences;
- Seek host agency assignments that have transportation resources (faith-based organizations providing community services may be able to serve as host agencies and provide transportation);
- Contact school districts and child care networks/facilities to determine in which rural areas the school bus is a feasible transportation alternative for SCSEP participants;
- Become more knowledgeable about state and local transportation planning processes and how to quantify and accurately characterize transportation needs of older individuals, including older job seekers and older workers; and
- Work with Boards to identify any existing collaborations with rural community transportation providers and planners to address local transportation needs.

LIMITED ACCESS TO COMPUTERS

A second resource in short supply that hinders rural SCSEP services is access to computers and the Internet. Low-income older job seekers often have limited or no computer skills. These skills are not only required by employers but important for participants to access the Internet, register in WorkInTexas.com and other online job search databases, and develop Internet search skills. Grantees' field staff members, including participant staff, need access to computers for data collection and communications in a state with such extensive rural areas. Improving access to computers in rural areas will increase the amount of computer and online training available for participants. To address rural technology needs, grantees will contact local businesses, governmental agencies, public libraries, and community- and faith-based organizations regarding ongoing computer and Internet access for participants on an ongoing basis.

LIMITED HOST AGENCIES

Many rural areas have few nonprofit organizations and governmental agencies to serve as host agencies for participants. Limited rural transportation options compound the challenges of identifying a sufficient number of host agencies and organizations with diverse skills training opportunities. More host agencies are needed that can provide general office skills training, computer skills training, and job-specific skills training.

To increase the number of rural host agencies and the diversity of skills training opportunities for participants, grantees will:

- Contact chambers of commerce and faith-based and community-based organizations to identify more potential host agencies;
- Use Texas Connector to identify nonprofit organizations and agencies addressing priority community needs that might serve as host agencies; and
- Work with local agencies and seek community partners to address local transportation solutions to increase the mobility of participants and their access to host agencies.

LACK OF SPECIALIZED SKILLS TRAINING

Rural communities often lack opportunities for skills training to supplement participants' OJT service assignments. Increasing access to laptops, desktop computers and iPads coupled with online training is a top priority for most SCSEP grantees in rural areas of Texas. As of October 1, 2015, AARP uses the VCN - SCSEP Checklist, developed in partnership with the AARP Foundation, the U.S. Department of Labor, and the American Association of Community Colleges (AACC). EW hosts the *JobReady* tool, supported by the National Business Services Alliance. Both tools offer a variety of online assessments, skills training, and certificates to measure competency levels for training in such fields as health care, sales, customer service, food service, child care, and hospitality. In some workforce areas, occupational demand exists in landscaping services, alternative fuel production, and unarmed security areas.

SER has used several contractors to provide participants with specialized skills training and certificates of completion on a variety of topics and skill areas, including financial literacy in English and Spanish, entrepreneurship, food service, clerical skills, customer service, vocational English, intensive job search, assessing career options, and job-readiness training. Additionally, a SER contractor has provided rural participants with mobile computer training.

To expand opportunities for participants' specialized training, grantees will:

- Explore all formats and technologies for low-cost additional training in the most important skills areas identified by local employers;
- Work with local community colleges and Workforce Solutions Offices to expand low-cost or no-cost skills training tailored to local employers' skill needs when appropriate; and
- Seek opportunities with local employers to access low-cost or no-cost, short-term skills training that is appropriate for seniors and the local job market.

When an employer does not have an immediate job opening, participants can attend specialized training for high-growth occupations so that when the opportunity arises, participants will have the requisite skills. For example, AARP Foundation SCSEP has trained participants in electronic health records and currently pilots a dual-occupation certification program with MedCerts for participant placement as a Certified Medical Administrative Assistant and Pharmacy Technician. AARP's San Antonio SCSEP office works with the city and CVS Pharmacy. AARP's Austin office works with the Travis County Sherriff in training for administrative services and other opportunities.

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2. LIST THE CITIES AND COUNTIES WHERE THE SCSEP PROJECT WILL TAKE PLACE. INCLUDE THE NUMBER OF SCSEP AUTHORIZED POSITIONS AND INDICATE IF AND WHERE THE POSITIONS CHANGED FROM THE PRIOR YEAR.

The chart below includes the counties where the project will be conducted and the number of SCSEP authorized positions.

Texas SCSEP PY'17 List of Counties and Authorized Positions

Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change
Anderson	5	0	0	0	6	5	-1
Andrews	0	1	0	-1	0	0	0
Angelina	7	0	0	0	8	7	-1
Aransas	4	4	4	0	0	0	0
Archer	0	1	0	-1	0	0	0
Armstrong	0	0	0	0	0	0	0
Atascosa	5	6	5	-1	0	0	0
Austin	3	3	3	0	0	0	0
Bailey	0	0	0	0	1	0	-1
Bandera	3	3	3	0	0	0	0
Bastrop	6	0	0	0	7	6	-1
Baylor	0	1	0	-1	0	0	0
Bee	4	4	4	0	0	0	0
Bell	20	22	20	-2	0	0	0
Bexar	156	0	0	0	170	156	-14
Blanco	0	0	0	0	1	0	-1
Borden	0	0	0	0	0	0	0
Bosque	3	3	3	0	0	0	0
Bowie	9	0	0	0	10	9	-1
Brazoria	20	22	20	-2	0	0	0
Brazos	10	11	10	-1	0	0	0
Brewster	0	1	0	-1	0	0	0
Briscoe	0	0	0	0	0	0	0
Brooks	2	2	2	0	0	0	0
Brown	5	5	5	0	0	0	0

Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change
Burleson	3	0	0	0	3	3	0
Burnet	5	0	0	0	5	5	0
Caldwell	5	0	0	0	5	5	0
Calhoun	2	2	2	0	0	0	0
Callahan	2	0	0	0	2	2	0
Cameron	70	0	0	0	76	70	-6
Camp	0	1	0	-1	0	0	0
Carson	0	0	0	0	1	0	-1

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Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change
Cass	5	0	0	0	5	5	0
Castro	0	0	0	0	1	0	-1
Chambers	4	0	0	0	4	4	0
Cherokee	7	8	7	-1	0	0	0
Childress	0	0	0	0	0	0	0
Clay	2	2	2	0	0	0	0
Cochran	0	0	0	0	1	0	-1
Coke	0	0	0	0	1	0	-1
Coleman	0	0	0	0	1	0	-1
Collin	30	0	0	0	33	30	-3

Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change
Collingsworth	0	0	0	0	0	0	0
Colorado	3	3	3	0	0	0	0
Comal	9	10	9	-1	0	0	0
Comanche	2	0	0	0	2	2	0
Concho	0	0	0	0	0	0	0
Cooke	4	0	0	0	4	4	0
Coryell	3	0	0	0	3	3	0
Cottle	0	0	0	0	0	0	0
Crane	0	0	0	0	0	0	0
Crockett	0	0	0	0	0	0	0
Crosby	0	0	0	0	1	0	-1
Culberson	0	1	0	-1	0	0	0
Dallam	0	0	0	0	1	0	-1
Dallas	190	0	0	0	208	190	-18
Dawson	2	0	0	0	2	2	0
Deaf Smith	2	0	0	0	2	2	0
Delta	0	0	0	0	1	0	-1
Denton	22	0	0	0	24	22	-2
DeWitt	3	3	3	0	0	0	0
Dickens	0	0	0	0	0	0	0
Dimmit	2	0	0	0	2	2	0
Donley	0	0	0	0	1	0	-1

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Duval	3	3	3	0	0	0	0
Eastland	4	0	0	0	4	4	0
Ector	12	13	12	-1	0	0	0
Edwards	0	0	0	0	0	0	0
Ellis	9	0	0	0	10	9	-1
El Paso	105	0	0	0	115	105	-10
Erath	5	0	0	0	5	5	0
Falls	3	0	0	0	3	3	0
Fannin	5	0	0	0	5	5	0
Fayette	4	0	0	0	4	4	0
Fisher	1	0	0	0	1	1	0
Floyd	1	0	0	0	1	1	0
Foard	0	0	0	0	0	0	0
Fort Bend	27	29	27	-2	0	0	0
Franklin	1	0	0	0	1	1	0
Freestone	2	0	0	0	2	2	0
Frio	3	3	3	0	0	0	0
Gaines	2	0	0	0	2	2	0
Galveston	23	0	0	0	25	23	-2
Garza	1	0	0	0	1	1	0
Gillespie	3	3	3	0	0	0	0
Glasscock	0	0	0	0	0	0	0
Goliad	1	1	1	0	0	0	0
Gonzales	3	3	3	0	0	0	0
Gray	2	0	0	0	2	2	0

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Grayson	12	0	0	0	13	12	-1
Gregg	11	12	11	-1	0	0	0
Grimes	4	4	4	0	0	0	0
Guadalupe	9	10	9	-1	0	0	0
Hale	4	0	0	0	4	4	0
Hall	1	0	0	0	1	1	0
Hamilton	1	0	0	0	1	1	0
Hansford	1	0	0	0	1	1	0

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Hardeman	1	0	0	0	1	1	0
Hardin	5	0	0	0	6	5	-1
Harris	305	0	0	0	335	305	-30
Harrison	8	9	8	-1	0	0	0
Hartley	0	0	0	0	0	0	0
Haskell	1	0	0	0	1	1	0
Hays	8	0	0	0	9	8	-1
Hemphill	0	0	0	0	0	0	0
Henderson	11	0	0	0	12	11	-1
Hidalgo	112	0	0	0	122	112	-10

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Hill	5	0	0	0	5	5	0
Hockley	2	0	0	0	2	2	0
Hood	5	6	5	-1	0	0	0
Hopkins	4	0	0	0	4	4	0
Houston	4	0	0	0	4	4	0
Howard	3	0	0	0	3	3	0
Hudspeth	1	1	1	0	0	0	0
Hunt	9	0	0	0	10	9	-1
Hutchinson	2	0	0	0	2	2	0
Irion	0	0	0	0	0	0	0
Jack	1	1	1	0	0	0	0
Jackson	2	2	2	0	0	0	0
Jasper	5	0	0	0	5	5	0
Jeff Davis	0	0	0	0	0	0	0
Jefferson	27	0	0	0	29	27	-2
Jim Hogg	1	1	1	0	0	0	0
Jim Wells	6	7	6	-1	0	0	0
Johnson	8	0	0	0	9	8	-1
Jones	2	0	0	0	2	2	0
Karnes	2	2	2	0	0	0	0
Kaufman	8	0	0	0	9	8	-1
Kendall	2	2	2	0	0	0	0
Kenedy	0	0	0	0	0	0	0

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Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change
Kent	0	0	0	0	0	0	0
Kerr	7	8	7	-1	0	0	0
Kimble	1	0	0	0	1	1	0
King	0	0	0	0	0	0	0
Kinney	0	0	0	0	0	0	0
Kleberg	4	4	4	0	0	0	0
Knox	1	1	1	0	0	0	0
Lamar	7	0	0	0	8	7	-1
Lamb	2	0	0	0	2	2	0
Lampasas	2	0	0	0	2	2	0
La Salle	1	1	1	0	0	0	0
Lavaca	3	3	3	0	0	0	0
Lee	2	0	0	0	2	2	0
Leon	2	2	2	0	0	0	0
Liberty	8	0	0	0	9	8	-1
Limestone	3	3	3	0	0	0	0
Lipscomb	0	0	0	0	0	0	0
Live Oak	2	2	2	0	0	0	0
Llano	3	0	0	0	3	3	0
Loving	0	0	0	0	0	0	0
Lubbock	21	0	0	0	23	21	-2
Lynn	1	0	0	0	1	1	0
McCulloch	2	0	0	0	2	2	0
McLennan	22	24	22	-2	0	0	0
McMullen	0	0	0	0	0	0	0

Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change
Madison	1	1	1	0	0	0	0
Marion	2	2	2	0	0	0	0
Martin	1	0	0	0	1	1	0
Mason	1	0	0	0	1	1	0
Matagorda	6	7	6	-1	0	0	0
Maverick	10	11	10	-1	0	0	0
Medina	5	6	5	-1	0	0	0
Menard	0	0	0	0	0	0	0

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Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change
Midland	9	10	9	-1	0	0	0
Milam	4	0	0	0	4	4	0
Mills	1	0	0	0	1	1	0
Mitchell	1	0	0	0	1	1	0
Montague	3	0	0	0	3	3	0
Montgomery	29	0	0	0	32	29	-3
Moore	1	0	0	0	1	1	0
Morris	2	0	0	0	2	2	0
Motley	0	0	0	0	0	0	0
Nacogdoches	6	7	6	-1	0	0	0

Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change
Navarro	5	0	0	0	6	5	-1
Newton	2	0	0	0	2	2	0
Nolan	2	0	0	0	2	2	0
Nueces	38	0	0	0	42	38	-4
Ochiltree	1	0	0	0	1	1	0
Oldham	0	0	0	0	0	0	0
Orange	8	0	0	0	9	8	-1
Palo Pinto	4	0	0	0	4	4	0
Panola	2	2	2	0	0	0	0
Parker	8	0	0	0	9	8	-1
Parmer	1	0	0	0	1	1	0
Pecos	2	2	2	0	0	0	0
Polk	6	0	0	0	7	6	-1
Potter	13	0	0	0	14	13	-1
Presidio	2	2	2	0	0	0	0
Rains	2	2	2	0	0	0	0
Randall	7	0	0	0	8	7	-1
Reagan	0	0	0	0	0	0	0
Real	1	1	1	0	0	0	0
Red River	4	0	0	0	4	4	0
Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change

Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change
Midland	9	10	9	-1	0	0	0
Milam	4	0	0	0	4	4	0
Mills	1	0	0	0	1	1	0
Mitchell	1	0	0	0	1	1	0
Montague	3	0	0	0	3	3	0
Montgomery	29	0	0	0	32	29	-3
Moore	1	0	0	0	1	1	0
Morris	2	0	0	0	2	2	0
Motley	0	0	0	0	0	0	0
Nacogdoches	6	7	6	-1	0	0	0
Navarro	5	0	0	0	6	5	-1
Newton	2	0	0	0	2	2	0
Nolan	2	0	0	0	2	2	0
Nueces	38	0	0	0	42	38	-4
Ochiltree	1	0	0	0	1	1	0
Oldham	0	0	0	0	0	0	0
Orange	8	0	0	0	9	8	-1
Palo Pinto	4	0	0	0	4	4	0
Panola	2	2	2	0	0	0	0
Parker	8	0	0	0	9	8	-1
Parmer	1	0	0	0	1	1	0
Pecos	2	2	2	0	0	0	0
Polk	6	0	0	0	7	6	-1
Potter	13	0	0	0	14	13	-1
Presidio	2	2	2	0	0	0	0

Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change
Rains	2	2	2	0	0	0	0
Randall	7	0	0	0	8	7	-1
Reagan	0	0	0	0	0	0	0
Real	1	1	1	0	0	0	0
Red River	4	0	0	0	4	4	0

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Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change
Refugio	1	1	1	0	0	0	0
Roberts	0	0	0	0	0	0	0
Robertson	2	2	2	0	0	0	0
Rockwall	3	0	0	0	3	3	0
Runnels	2	0	0	0	2	2	0
Rusk	5	6	5	-1	0	0	0
Sabine	3	0	0	0	3	3	0
San Augustine	2	0	0	0	2	2	0
San Jacinto	4	0	0	0	4	4	0
San Patricio	7	8	7	-1	0	0	0
San Saba	1	0	0	0	1	1	0
Schleicher	1	0	0	0	1	1	0

Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change
Scurry	2	0	0	0	2	2	0
Shackelford	1	0	0	0	1	1	0
Shelby	3	3	3	0	0	0	0
Sherman	0	0	0	0	0	0	0
Smith	21	23	21	-2	0	0	0
Somervell	1	0	0	0	1	1	0
Starr	13	14	13	-1	0	0	0
Stephens	1	0	0	0	1	1	0
Sterling	0	0	0	0	0	0	0
Stonewall	0	0	0	0	0	0	0
Sutton	1	0	0	0	1	1	0
Swisher	1	0	0	0	1	1	0
Tarrant	115	0	0	0	126	115	-11
Taylor	12	0	0	0	13	12	-1
Terrell	0	0	0	0	0	0	0
Terry	1	0	0	0	1	1	0
Throckmorton	0	0	0	0	0	0	0
Titus	3	0	0	0	3	3	0
Tom Green	11	0	0	0	12	11	-1

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Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change

Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change
Travis	57	0	0	0	62	57	-5
Trinity	3	0	0	0	3	3	0
Tyler	4	4	4	0	0	0	0
Upshur	5	5	5	0	0	0	0
Upton	0	0	0	0	0	0	0
Uvalde	5	5	5	0	0	0	0
Val Verde	8	0	0	0	9	8	-1
Van Zandt	7	8	7	-1	0	0	0
Victoria	8	9	8	-1	0	0	0
Walker	4	0	0	0	4	4	0
Waller	4	4	4	0	0	0	0
Ward	2	2	2	0	0	0	0
Washington	4	4	4	0	0	0	0
Webb	31	0	0	0	34	31	-3
Wharton	5	6	5	-1	0	0	0
Wheeler	1	0	0	0	1	1	0
Wichita	12	13	12	-1	0	0	0
Wilbarger	2	2	2	0	0	0	0
Willacy	5	5	5	0	0	0	0
Williamson	18	20	18	-2	0	0	0
Wilson	4	4	4	0	0	0	0
Winkler	1	1	1	0	0	0	0
Wise	5	0	0	0	5	5	0
Wood	5	6	5	-1	0	0	0
Yoakum	2	0	0	0	2	2	0

Counties	PY 17 ED Based on Census	PY 2016 State Grantee Authorized Positions	PY 2017 State Grantee Authorized Positions	PY 2016 - 2017 State Grantee Change	PY 2016 National Grantee Authorized Positions	PY 2017 National Grantee Authorized Positions	PY 2016 - 2017 National Grantee Change
Young	3	0	0	0	3	3	0
Zapata	2	2	2	0	0	0	0
Zavala	3	3	3	0	0	0	0
Total	2165	494	452	-42	1872	1713	-159

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Equitable Distribution

The number of DOL—authorized SCSEP positions by county is based on the ratio of eligible individuals in each county to the total eligible population in the state.

Current Distribution

The following table provides the number of counties that are underserved and overserved, both statewide and for each county. Texas defines significant variance as both over +/— 10 percent variance and more than +/— three positions variance.

In PY'17 Quarter 3

Variance	Number of Counties	Percent of All Counties with Authorized Positions (452)	Average Percentage of Variance
Underserved Statewide	38	45.8%	49.2%
AARP Foundation	9	31%	20.50%
National Asian Pacific Center on Aging	0	0%	0%
SER—Jobs for Progress National, Inc.	46	57.10%	46.20%
Senior Service America, Inc	50	51%	46.20%
Institute for Indian Development	35	89.7%	79.1%
State Grantee	38	43.20%	49.20%
Overserved Statewide	37	44.6%	55.9%
AARP Foundation	16	55.20%	12.80%
National Asian Pacific Center on Aging	1	100%	7.30%

SER—Jobs for Progress National, Inc.	2	28.60%	57.10%
Senior Service America, Inc.	28	28.60%	64.50%
Institute for Indian Development	3	7.7%	37.5%
State Grantee	37	42%	55.9%
Combined Total Under— and Overserved	75	90.4%	48.5%

3. DESCRIBE ANY CURRENT SLOT IMBALANCES AND PROPOSED STEPS TO CORRECT INEQUITIES TO ACHIEVE EQUITABLE DISTRIBUTION.

Counties are underserved because of the following issues:

State grantee - Underserved counties have recruitment challenges because they are in remote rural areas with limited employment opportunities for SCSEP participants.

AARP Foundation - Rural counties such as Bastrop, Hays, Fayette, Kimble, and Ellis have been challenged to attract potential SCSEP participants because of location, lack of transportation, and limited opportunities in rural areas. It also is difficult to find suitable host agencies for assignments that are accessible to SCSEP participants.

National Asian Pacific Center on Aging (NAPCA) - No counties were significantly underserved.

Institute for Indian Development (IID) - The reason for a significant underserved variance in the counties with authorized positions is that they are a new national grantee without SCSEP participants transitioning to SCSEP program. There are 205 vacant positions in Arkansas, Louisiana, Mississippi, and Texas.

SER-Jobs for Progress, Inc. - No counties were significantly underserved.

Senior Service America, Inc. (SSAI) - Between October 2016 and February 2017, SSAI focused on the planning and transition of participants from 51 incoming counties in Texas that were gained because of the SCSEP national grantee competition. As of February 2017, Collin, Denton, Houston, Liberty, Montgomery, Orange, and Red River counties are new counties for SSAI's subgrantee, Motivation, Education, and Training (MET), Inc. These counties transitioned to SSAI underenrolled from the previous national grantee.

Lubbock County - SSAI has served Lubbock County since July 1, 2017, with 20 SCSEP participants; the year-to-date variance is -1. With exits, the current enrollment in Lubbock County is 17 active participants. TWC expects to serve more than 21 SCSEP participants in Lubbock County by June 30, 2018.

Potter County - SSAI has served Potter County since July 1, 2017 with 10 SCSEP participants; the year-to-date variance is -3. Potter County has seven active SCSEP participants. TWC expects to serve more than 12 SCSEP participants in Potter County by June 30, 2018.

SCSEP grantees in Texas overserve counties for the following reasons:

- NAPCA - Plan to monitor the enrollment level based on the slots to ensure equitable distribution numbers in Harris County.

- AARP - The slot reduction for Bexar County contributes to the 12.2 percent overserved variance. Bexar County has the highest exit rate for employment percentage within the AARP Foundation SCSEP. In PY'16, Bexar County placed 85 percent of its authorized slot count into employment (159 individuals) and had an entered employment rate of 93.5 percent. The overserved variance is projected to decrease due to the high employment exit rate in Bexar County.
- SER National Jobs for Progress - Overenrollment variance is due to the 8.5 percent decrease in slots. We are still serving the SCSEP participants on approved breaks from activities in the SCSEP program.
- Senior Service America, Inc. (SSAI) - SSAI has served Hale County since PY'12 with a satellite office that covers SCSEP operations in 12 counties. Therefore, SCSEP staff has built a strong SCSEP presence in Hale County.
- IID - No counties were significantly overserved.
- State Grantee - Overserved counties have recruitment challenges because there are many employment opportunities. SCSEP participants who are on approved break from activities and who have approved extensions are still active in the SCSEP program. Additionally, authorized positions were eliminated in counties such as Archer, Baylor, Brewster, Camp, and Kinney due to the 8.5 percent reduction, but we continue to serve the participants until they exit the SCSEP program.

The variance table above shows the 136 significantly underserved counties and the 87 significantly overserved counties. The state's goal is to maximize the number of counties and workforce areas with zero balance, in which the number of participants in a county equals the number of authorized positions in the county. Any proposed exchange of positions and counties will be submitted to DOL for approval.

4. EXPLAIN THE STATE'S LONG-TERM STRATEGY FOR ACHIEVING AN EQUITABLE DISTRIBUTION OF SCSEP POSITIONS WITHIN THE STATE THAT:

A. MOVES POSITIONS FROM OVER-SERVED TO UNDERSERVED LOCATIONS WITHIN THE STATE IN COMPLIANCE WITH 20 CFR 641.365.

To address underenrollment, grantees will:

- recruit new SCSEP participants, host agencies, and employers by:

1023. using social media, advertisements with local newspapers, and fliers;
1024. networking with community partners to increase referrals;
1025. participating in older-adult events; and
1026. conducting local recruitment fairs to increase visibility of the SCSEP program;

- identify realistic employment goals for community service assignments to provide required skill training needed for employment;
- schedule regular outreach times and community networking in each underserved county;
- use community partners to assist case management, support services, and training;
- hire new regional coordinators to assist with the recruitment and job placement of SCSEP participants in the unfamiliar territory; and
- use best practices from *The Nine "Best Practices" of Highly Effective SCSEP Projects*.

Staff will receive a list of host agencies with vacancies for SCSEP participant referrals.

To address overenrollment, grantees will:

- focus and monitor job development activities and work with host agencies to ensure that participants are exiting the SCSEP program for employment;
- train new coordinators to balance the authorized positions and enrollments of SCSEP participants; and
- freeze enrollments in significantly overserved counties and recruit new participants in other counties that are underserved.

B. EQUITABLY SERVES BOTH RURAL AND URBAN AREAS.

SCSEP grantees in Texas will review the latest equitable distribution quarterly, reinforce strategies used, and share ideas to support achieving "zero balance" in particularly challenging counties.

C. SERVES INDIVIDUALS AFFORDED PRIORITY FOR SERVICE UNDER 20 CFR 641.520. (20 CFR 641.302(A), 641.365, 641.520)

One of SCSEP's primary goals is to provide services for eligible individuals who need additional training and employment support services to assist them to overcome significant barriers and obtain unsubsidized jobs.

In accordance with 20 CFR §641.520(c), grantees apply priority of service for enrollment in thefollowing order:

- Veterans or qualified spouses who have at least one of the other priority characteristics.
- Veterans or qualified spouses who do not have one of the other priority characteristics.
- Individuals who do not qualify as veterans or qualified spouses and who have at least one of the other priority characteristics.

As specified in 20 CFR §641.520(a), the other priority characteristics include the following:

- Being 65 years of age or older;
- Having a disability;
- Having Limited English Proficiency;
- Having low literacy skills;
- Residing in a rural area;
- Having low employment prospects;
- Having failed to find employment after using services provided through the one-stop delivery system; or
- Being homeless or at risk for homelessness.

5. PROVIDE THE RATIO OF ELIGIBLE INDIVIDUALS IN EACH SERVICE AREA TO THE TOTAL ELIGIBLE POPULATION IN THE STATE. (20 CFR 641.325(A))

WorkforceArea	Urban SCSEP—Eligible Population	Rural SCSEP—Eligible Population	Total SCSEP—Eligible Population	% Rural Population
Statewide	655,343	157,659	813,002	19.4%
Alamo	70,351	6,298	76,649	8.2%
Brazos Valley	5,799	3,056	8,855	34.5%
Cameron County	25,060	1,190	26,250	4.5%
Capital Area	20,219	0	20,219	0.0%
Central Texas	9,573	2,647	12,220	21.7%
Coastal Bend	21,157	13,930	35,087	39.7%
Concho Valley	4,731	1,914	6,645	28.8%
Dallas	65,354	0	65,354	0.0%
Deep East Texas	4,622	14,201	18,823	75.4%
East Texas	19,836	15,186	35,022	43.4%
Golden Crescent	3,869	4,106	7,975	51.5%
Gulf Coast	150,465	11,288	161,753	7.0%
Heart of Texas	10,315	3,508	13,823	25.4%
Lower Rio Grande	43,225	0	43,225	0.0%
Middle Rio Grande	0	12,534	12,534	100.0%
North Central	29,620	13,614	43,234	31.5%
North East Texas	4,343	9,038	13,381	67.5%
North Texas	4,855	2,835	7,690	36.9%
Panhandle	7,688	6,842	14,530	47.1%
Permian Basin	8,559	7,274	15,833	45.9%
Rural Capital Area	13,559	4,312	17,871	24.1%
South Plains	9,179	5,770	14,949	38.6%
South Texas	11,254	5,915	17,169	34.5%
Southeast Texas	15,241	0	15,241	0.0%
Tarrant	42,573	0	42,573	0.0%

WorkforceArea	Urban SCSEP—Eligible Population	Rural SCSEP—Eligible Population	Total SCSEP—Eligible Population	% Rural Population
Texoma	5,075	2,431	7,506	32.4%
Upper Rio Grande/ Borderplex	43,661	1,148	44,809	2.6%
West Central Texas	5,160	8,622	13,782	62.6%
Sources: Ratios created for each workforce area using zip code populations from 2010 SF1 100% Census File through American Fact Finder (Table P1), zip—to—rural code file (Census Data http://ruralhealth.und.edu/ruca/final310.csv**), and TWC zip—to—wda crosswalk.**				

6. PROVIDE THE RELATIVE DISTRIBUTION OF ELIGIBLE INDIVIDUALS WHO:

Provide the relative distribution of eligible individuals who:

A. RESIDE IN URBAN AND RURAL AREAS WITHIN THE STATE

The distribution of the rural SCSEP—eligible population in workforce areas and in grantee service areas was provided intheStrategies to AddressRural Service Delivery Challenges section. The following table compares statewide statistics on special populations that have priority for SCSEP enrollment, with statewide SCSEP enrollment statistics for PY'13.

Comparison of SCSEP—Eligible Population Characteristics with SCSEP Participant Characteristics in PY'13

Priority Population Groups	Statewide Eligible Population[1]	% of Eligible Population	Texas SCSEP Participants	% of Texas SCSEP Participants
Total Population	794,237	100.0%	4,243	100.0%
Female	483,621	60.9%	2,527	59.6%
Male	310,616	39.1%	1,716	40.4%
Priority Populations	No data	No data	No data	No data
Are Age 75 and Older[2]	213,972	26.9%	193	4.5%
Have Limited English Proficiency	175,016	22.0%	519	15.9%

Priority Population Groups	Statewide Eligible Population[1]	% of Eligible Population	Texas SCSEP Participants	% of Texas SCSEP Participants
Have less than 9th—Grade Education	707,278	89.1%	1,026	12.2%
Have a Disability[3]	390,877	44.7%	928	11.0%
Reside in Rural Areas	157,659	19.4%	1,955	22.7%
Are Veterans	87,717	11.4%	838	9.5%
Are Homeless (55+)[4]	22,500 annually	3.1%—3.8% annually	2,955 at risk or homeless	69.6% at risk or homeless
Have the Greatest Economic Need — Income At or Below the Federal Poverty Level[6]	73.7%	3,726	87.7%	
Are Minorities Hispanic/Latino Black/African American Asian and Pacific Islander American Indian	433,100 290,620 114,385 17,645 3,165	57.9% 38.9% 15.3% 2.4% 0.4%	2,883 1,589 1,166 132	

Unless specified otherwise in the table above, *eligible population* refers to individuals age 55 and older who have incomes at or below 125 percent of U.S. Department of Health and Human Services (HHS) Federal Poverty Levels (FPLs). These statistics are presented with the caveat that both the number of SCSEP—eligible individuals who are physically able to work and are seeking employment is unknown.

The table indicates that grantees have successfully recruited participants from rural areas; minorities in general, especially Blacks/African Americans; and those with incomes at or below the FPL in proportions exceeding those in the SCSEP—eligible population. The proportions of enrolled participants who were limited English proficient, veterans, and Asian/Pacific Islander and American Indian minorities were similar to their proportions in the statewide SCSEP—eligible population.

Hispanics/Latinos were slightly underrepresented in grantees' participant population: minorities compose 37.8 percent of Texas participants in comparison with 41.1 percent of the state's SCSEP—eligible population. Individuals with less than a ninth—grade education and individuals with disabilities were significantly underrepresented in the SCSEP participant population. About 12 percent of Texas participants have less than a ninth—grade education, compared to 89 percent of SCSEP—eligible individuals in the state. Eleven percent of participants have disabilities, in comparison with 44.7 percent of the SCSEP—eligible population. As noted earlier, however, reliable estimates for the number of SCSEP—eligible individuals in these two population groups that are able to work and are seeking employment are not available.

Statewide statistics available for several most—in—need special population groups introduced in the Older Americans Act Amendments of 2006 are not available. The table below provides PY'13 enrollment statistics for these participant characteristics.

An additional special population identified in the Older Americans Act Amendments of 2006 is the SCSEP—eligible individuals who have the "greatest social need"—caused by noneconomic factors, which include physical and mental disabilities; language barriers; and cultural, social, or geographic isolation. Although there are no statistics available for those with the greatest social need, the estimates for the proportion of subset categories include SCSEP—eligible individuals:

- With disabilities — 44.7 percent;
- With Limited English Proficiency — 20.2 percent; and
- Experiencing geographic isolation — 2.4 percent residing in 64 frontier counties averaging fewer than seven persons per square mile.

PY'13 SCSEP Participants' Special Population Characteristics

Special Population Characteristics	Texas SCSEP Participants	% of Texas SCSEP Participants
Total Participants	4,207	100.0%
Have low literacy levels	1,236	29.1%
Have low employment prospects	3,896	91.7%
Failed to find a job after using Title I WIA	137	3.2%
Were age 75 years and over at time of report	323	7.6%
Are displaced homemakers	583	13.7%
Receive public assistance	1,865	41.9%
Have severe disabilities	1,865	43.9%
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Are age—eligible but do not have enough work history to receive Social Security Title II	41	1.0%
Have severely limited employment prospects	334	7.9%

[1] Total SCSEP—eligible population for gender estimates is 794,237.

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B. HAVE THE GREATEST ECONOMIC NEED

The distribution of the rural SCSEP—eligible population in workforce areas and in grantee service areas was provided intheStrategies to AddressRural Service Delivery Challenges section. The following table compares statewide statistics on special populations that have priority for SCSEP enrollment, with statewide SCSEP enrollment statistics for PY'13.

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Priority Population Groups	Statewide Eligible Population[1]	% of Eligible Population	Texas SCSEP Participants	% of Texas SCSEP Participants
Total Population	794,237	100.0%	4,243	100.0%
Female	483,621	60.9%	2,527	59.6%
Male	310,616	39.1%	1,716	40.4%
Priority Populations	No data	No data	No data	No data
Are Age 75 and Older[2]	213,972	26.9%	193	4.5%
Have Limited English Proficiency	175,016	22.0%	519	15.9%
Have less than 9th—Grade Education	707,278	89.1%	1,026	12.2%
Have a Disability[3]	390,877	44.7%	928	11.0%
Reside in Rural Areas	157,659	19.4%	1,955	22.7%
Are Veterans	87,717	11.4%	838	9.5%
Are Homeless (55+)[4]	22,500 annually	3.1%—3.8% annually	2,955 at risk or homeless	69.6% at risk or homeless

Priority Population Groups	Statewide Eligible Population[1]	% of Eligible Population	Texas SCSEP Participants	% of Texas SCSEP Participants
Have the Greatest Economic Need — Income At or Below the Federal Poverty Level[5]	644,431[6]	73.7%	3,726	87.7%
Are Minorities Hispanic/Latino Black/African American Asian and Pacific Islander American Indian	433,100 290,620 114,385 17,645 3,165	57.9% 38.9% 15.3% 2.4% 0.4%	2,883 1,589 1,166 132	

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with the greatest social need, the estimates for the proportion of subset categories include SCSEP—eligible individuals:

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Special Population Characteristics	Texas SCSEP Participants	% of Texas SCSEP Participants
Total Participants	4,207	100.0%
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Were age 75 years and over at time of report	323	7.6%
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C. ARE MINORITIES

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Reside in Rural Areas	157,659	19.4%	1,955	22.7%
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Are Homeless (55+)[4]	22,500 annually	3.1%—3.8% annually	2,955 at risk or homeless	69.6% at risk or homeless
Have the Greatest Economic Need — Income At or Below the Federal Poverty Level[5]	644,431[6]	73.7%	3,726	87.7%

Priority Population Groups	Statewide Eligible Population[1]	% of Eligible Population	Texas SCSEP Participants	% of Texas SCSEP Participants
Are Minorities	433,100	57.9%	2,883 1,589	
Hispanic/Latino	290,620	38.9%	1,166 132	
Black/African	114,385	15.3% 2.4%		
American Asian and Pacific Islander	17,645 3,165	0.4%		
American Indian				

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D. ARE LIMITED ENGLISH PROFICIENT.

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Are Minorities Hispanic/Latino Black/African American Asian and Pacific Islander American Indian	433,100 290,620 114,385 17,645 3,165	57.9% 38.9% 15.3% 2.4% 0.4%	2,883 1,589 1,166 132	

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E. HAVE THE GREATEST SOCIAL NEED. (20 CFR 641.325(B))

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7. DESCRIBE THE STEPS TAKEN TO AVOID DISRUPTIONS TO SERVICE FOR PARTICIPANTS TO THE GREATEST EXTENT POSSIBLE, WHEN POSITIONS ARE REDISTRIBUTED, AS PROVIDED IN 20 CFR 641.365; WHEN NEW CENSUS OR OTHER RELIABLE DATA BECOMES AVAILABLE; OR WHEN THERE IS OVER-ENROLLMENT FOR ANY OTHER REASON. (20 CFR 641.325(I), 641.302(B))

Strategies to Avoid Participant Disruption

When there is a change in grantee and/or grantee service area, TWC will host a meeting or conference call to develop a transition plan and timetable for:

- Informing participants and host agencies in advance;
- Transferring records;
- Holding orientations for participants and host agencies; and
- Supporting continuity in administrative and programmatic functions.

When positions need to be shifted from overserved to underserved counties, grantees will:

- Use a gradual approach to redistribute the slots through attrition; and
- Encourage and work intensively to assist job-ready participants in overserves counties to find unsubsidized employment.

SCSEP ASSURANCES

The State Plan must include assurances that where SCSEP is included in the Combined Workforce Plan, the State has established a written policy and procedure to obtain advice and recommendations on the State Plan from:

Representatives of the State and area agencies on aging; Yes

State and local boards under WIOA; Yes

Public and private nonprofit agencies and organizations providing employment services, including each grantee operating a SCSEP project within the State, except as provided under section 506(a)(3) of OAA and 20 CFR 641.320(b); Yes

Social service organizations providing services to older individuals; Yes

Grantees under Title III of OAA; Yes

Affected Communities; Yes

Unemployed older individuals; Yes

Community-based organizations serving older individuals; Yes

Business organizations; and Yes

Labor organizations. Yes

STATE COMMENTS ON SCSEP ASSURANCES

APPENDIX 1. PERFORMANCE GOALS FOR THE CORE PROGRAMS

Each State submitting a Unified or Combined Plan is required to identify expected levels of performance for each of the primary indicators of performance for the two years covered by the plan. The State is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education on state adjusted levels of performance for the indicators for each of the two years of the plan. States will only have one year of data available under the performance accountability system in Section 116 of the WIOA; therefore, the Departments will continue to use the transition authority under WIOA sec. 503(a) to designate certain primary indicators of performance as "baseline" indicators in the first plan submission. A "baseline" indicator is one for which States will not propose an expected level of performance in the plan submission and will not come to agreement with the Departments on negotiated levels of performance. "Baseline" indicators will not be used in the end of the year performance calculations and will not be used to determine failure to achieve adjusted levels of performance for purposes of sanctions. The selection of primary indicators for the designation as a baseline indicator is made based on the likelihood of a state having adequate data on which to make a reasonable determination of an expected level of performance and such a designation will vary across core programs.

States are expected to collect and report on all indicators, including those that that have been designated as "baseline". The actual performance data reported by States for indicators designated as "baseline" in the first two years of the Unified or Combined Plan will serve as baseline data in future years.

Each core program must submit an expected level of performance for each indicator, except for those indicators that are listed as "baseline" indicators below.

For this Plan, the Departments will work with States during the negotiation process to establish the negotiated levels of performance for each of the primary indicators for the core programs.

Baseline Indicators for the First Two Years of the Plan

Title I programs (Adult, Dislocated Workers, and Youth):

- Measurable Skill Gains
- Effectiveness in Serving Employers

Title II programs (Adult Education):

- Employment in the 2nd quarter
- Employment in the 4th quarter
- Median Earnings
- Credential Attainment
- Effectiveness in Serving Employers

Title III programs (Wagner-Peyser):

- Effectiveness in Serving Employers

Title IV programs (Vocational Rehabilitation):

- Employment in the 2nd quarter
- Employment in the 4th quarter
- Median Earnings
- Credential Attainment
- Measurable Skill Gains
- Effectiveness in Serving Employers

States may identify additional indicators in the State plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the State indicators. Please identify any such State indicators under Additional Indicators of Performance.

TABLE 1. EMPLOYMENT (SECOND QUARTER AFTER EXIT)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	76.10	76.10	76.30	76.10
Dislocated Workers	81.10	81.10	81.30	81.10
Youth	71.90	71.90	72.10	71.90
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	69.00	69.00	69.20	69.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 1

TABLE 2. EMPLOYMENT (FOURTH QUARTER AFTER EXIT)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	73.10	73.10	73.30	73.10
Dislocated Workers	80.10	80.10	80.30	80.10
Youth	73.90	73.90	74.10	73.90
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	69.00	69.00	69.20	69.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 2

TABLE 3. MEDIAN EARNINGS (SECOND QUARTER AFTER EXIT)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	4,800.00	4,800.00	4,900.00	4,800.00
Dislocated Workers	7,300.00	7,300.00	7,400.00	7,300.00

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	5,200.00	5,200.00	5,300.00	5,200.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 3

TABLE 4. CREDENTIAL ATTAINMENT RATE

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	65.00	65.00	65.20	65.00
Dislocated Workers	74.00	74.00	74.20	74.00
Youth	61.40	61.40	61.60	61.40
Adult Education	Baseline	Baseline	Baseline	Baseline

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 4

TABLE 5. MEASUREABLE SKILL GAINS

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	52.00	52.00	53.00	53.00
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 5

TABLE 6. EFFECTIVENESS IN SERVING EMPLOYERS

Measure	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Line 1 (enter the measure information in the comments below)	Baseline	Baseline	Baseline	Baseline
Line 2	Baseline	Baseline	Baseline	Baseline
Line 3	Baseline	Baseline	Baseline	Baseline
Line 4	Baseline	Baseline	Baseline	Baseline
Line 5	Baseline	Baseline	Baseline	Baseline
Line 6	Baseline	Baseline	Baseline	Baseline

User remarks on Table 6

TABLE 7. ADDITIONAL INDICATORS OF PERFORMANCE

Measure	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level

User remarks on Table 7

APPENDIX 2. OTHER STATE ATTACHMENTS (OPTIONAL)

FOOTNOTES (BLIND)

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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 (BLIND)

Effective September 1, 2016, the Texas Department of Assistive and Rehabilitative Services (DARS) Division for Blind Services (DBS) and Division for Rehabilitation Services (DRS) Designated State Units (DSUs) transfer to the Texas Workforce Commission, which becomes the Designated State Agency (DSA). The DRS and DBS portions of the Texas Combined State Plan for Federal Fiscal Years 2017-2020 (VR Plans) are hereby amended to reflect that organizational and DSA change. All references to the entity which constitutes the DSA in the DBS and DRS VR Plans, Certifications and Assurances effective September 1, 2016 are changed from Department of Assistive and Rehabilitative Services to Texas Workforce Commission.

Under the new TWC organizational structure which will be effective September 1, 2016, the DSU for General VR and the DSU for Blind Services will each be established as a separate Division.

CERTIFICATION REGARDING LOBBYING — VOCATIONAL REHABILITATION (BLIND)

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

(BLIND)

(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.

(BLIND)

(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.

(BLIND)

(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 (BLIND)

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

Name of designated State agency or designated State unit, as appropriate **TWC Division for Blind Services**

Name of designated State agency **Texas Workforce Commission**

Full Name of Authorized Representative: **Scott Bowman**

Title of Authorized Representative: **Director, Division for Blind Services**

CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT (BLIND)

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

(BLIND)

(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.

(BLIND)

(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.

(BLIND)

(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 (BLIND)

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

Name of designated State agency or designated State unit, as appropriate **TWC Division for Blind Services**

Name of designated State agency **Texas Workforce Commission**

Full Name of Authorized Representative: **Scott Bowman**

Title of Authorized Representative: **Director, Division for Blind Services**

ASSURANCES (BLIND)

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: (BLIND)

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: (BLIND)

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: (BLIND)

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. (BLIND)

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

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

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

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

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

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. (BLIND)

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. (BLIND)

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. (Blind)

i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act . (Blind)

j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act. (Blind)

k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act. (Blind)

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. (Blind)

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

4. ADMINISTRATION OF THE PROVISION OF VR SERVICES: (BLIND)

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. (BLIND)

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 . (BLIND)

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? (BLIND)

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

d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act. (Blind)

e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act. (Blind)

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. (Blind)

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. (Blind)

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. (Blind)

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 (Blind)

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)).

(BLIND)

5. PROGRAM ADMINISTRATION FOR THE SUPPORTED EMPLOYMENT TITLE VI SUPPLEMENT: (BLIND)

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. (BLIND)

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. (BLIND)

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. (BLIND)

6. FINANCIAL ADMINISTRATION OF THE SUPPORTED EMPLOYMENT PROGRAM: (BLIND)

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. (BLIND)

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. (BLIND)

7. PROVISION OF SUPPORTED EMPLOYMENT SERVICES: (BLIND)

A. THE DESIGNATED STATE AGENCY ASSURES THAT IT WILL PROVIDE SUPPORTED EMPLOYMENT SERVICES AS DEFINED IN SECTION 7(39) OF THE REHABILITATION ACT. (BLIND)

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.

(BLIND)

ADDITIONAL COMMENTS ON THE ASSURANCES FROM THE STATE (BLIND)

For Assurance 4 the Division for Blind Services has indicated it is able to serve all eligible individuals by choosing “yes”.

Effective September 1, 2016, the Texas Department of Assistive and Rehabilitative Services (DARS) Division for Blind Services (DBS) and Division for Rehabilitation Services (DRS) Designated State Units (DSUs) transfer to the Texas Workforce Commission, which becomes the Designated State Agency (DSA). The DRS and DBS portions of the Texas Combined State Plan for Federal Fiscal Years 2017-2020 (VR Plans) are hereby amended to reflect that organizational and DSA change. All references to the entity which constitutes the DSA in the DBS and DRS VR Plans, Certifications and Assurances effective September 1, 2016 are changed from Department of Assistive and Rehabilitative Services to Texas Workforce Commission.

Under the new TWC organizational structure which will be effective September 1, 2016, the DSU for General VR and the DSU for Blind Services will each be established as a separate Division.