

WIOA STATE PLAN FOR THE COMMONWEALTH OF KENTUCKY 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))

* 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.

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

I. WIOA STATE PLAN TYPE

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

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

Combined State Plan. This plan includes the Adult, 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.) Yes

Unemployment Insurance Programs (Programs authorized under State unemployment compensation laws in accordance with applicable Federal law) Yes

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

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

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

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

II. STRATEGIC ELEMENTS

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

Kentucky's economy, influenced by the 2008 national recession, experienced a decrease of 79,300 jobs, or —4.3 percent, between 2000 and 2010. Kentucky started a slow job recovery in 2010. Prior to the recession, between 1997 and 2007, total employment in Kentucky grew by 134,300 jobs or 7.8 percent. Kentucky Occupational Projections for 2012 to 2022 forecast total employment to grow by 229,350 jobs or 11.6 percent as Kentucky adds back jobs lost during the recession and adds new jobs as well.

Kentucky's unemployment rate was 5.3 percent in 1997 and reached a low of 4.2 percent in 2000. Before the recession of 2008, the unemployment rate rose to 5.2 percent and peaked in 2003 at 6.1 percent. It declined to 5.4 percent by 2007. At the start of the recession in 2008, it grew to 6.4 percent and peaked at 10.3 percent in 2009 before falling slightly to 10.2 percent in 2010. In 2014, it had fallen to an annual rate of 6.5 percent. In January 2014, the unemployment rate stood at 7.5 percent but had fallen to 5.5 percent that December. The latest monthly unemployment data, December 2015, shows a further drop to 5.3 percent. An unemployment rate of 5 percent is considered full employment due to the turnover in employment. Kentucky is entering a period when the movement of the large Baby Boom age cohort, now in their 50s and 60s, are exiting the workforce. The significantly smaller age cohort of Generation Xer's, now in their 30s and 40s, is replacing Baby Boomers and will increasingly put a strain on employers' ability to replace existing employees and attract new employees in emerging industry sectors.

Annual job openings are expected to average 69,000 between 2012 and 2022. Annual job openings reflect both new jobs added and replacement of workers in existing jobs as they leave those jobs,

attributed growth or separation in the 2012 to 2022 Kentucky Occupational Projections. Job growth is projected to account for 24,000 jobs annually, while 45,000 job losses are projected to be from separations. Job turnover and the retirement of Baby Boomers are both factors in job separations.

The greatest projected employment growth between 2012 and 2022, 33,000 jobs or 10.1 percent, will be in office and administrative support services sector, which includes temporary workers in this sector and 28,000 jobs or 22.5 percent in healthcare practitioners and technical occupations. Unfortunately, there is not employment data for “1099” employees or “gig workers,” who, along with temporary workers, are an increasing population share of workers. The “1099” employees and the “gig workers” are self-employed and not covered by unemployment insurance (UI), and therefore not shown in employee data. Other employment growth areas include computer and mathematical occupations: 6,700 jobs or 19.5 percent; health care support occupations, 12,800 jobs or 23.9 percent; food preparation and serving occupations, 14,500 jobs or 9.0 percent; and sales and related occupations, 16,100 jobs or 18.5 percent.

Kentucky’s educational attainment levels continue to increase with persons ages 25+ with a high school degree or above rising from 74.1 percent in 2000 to 83.5 percent as indicated in the 2010—14

American Community Survey (ACS) from the U.S. Census. The education and skills needed vary in these occupations from higher educational levels with higher pay to lower educational levels with low levels of pay. The Kentucky Occupational Projections indicate that higher education levels are seeing a greater percentage of growth with people with bachelor’s degrees increasing by 45,000 or 15.3 percent; those with associate degrees growing at 17,000 or 19.9 percent; and people with post-secondary non-degree awards increasing by 20,000 or 16.4 percent. While many job openings (88,000) are for those with a high school degree or GED only, this segment is only growing at 10 percent, and openings for those with less than a high school degree (43,000), climbing by only 8.7 percent. The U.S. Bureau of Labor Statistics (BLS) research has shown that as education levels rise, unemployment rates go down and pay goes up. Therefore the importance of education and training is critical for employees to improve their life chances.

In July 2015, the Kentucky Chamber of Commerce released the Kentucky’s Workforce Challenges: the Employer’s Perspective report, based on a survey of Kentucky chamber members. The following challenges were identified by employers.

- Lack of employer engagement: Insufficient involvement by employers to affect change in training programs that address demand-side needs.
- Identifying the local contact: A lack of clarity about the community-level service delivery of state programs, particularly in regard to which agency or individual is in charge.
- Lack of promotion for available programs: The need for greater communication and outreach to employers and job seekers about available programs, how to access information, the need for specific training and skill development and related issues.
- Identifying who’s in charge of money/programs? Ongoing concerns with governance, management and coordination of workforce programs.
- Missing soft skills: The need for improved employability skills, or soft skills, such as attendance, communication and teamwork, among job seekers.
- Drugs in the workplace: Increasing difficulties in finding drug-free job applicants.
- Not using job credentials properly: Inconsistent use of credentials by employers, job seekers and educational institutions.

- Inability to coordinating programs: Insufficient coordination among educational institutions, economic development agencies and workforce programs.

In response to a question regarding the state of the workforce as it relates to their individual company employment needs, employers responded as follows:

- 27 percent have trouble finding people with good soft skills,
- 23 percent have trouble finding people with the right technical skills,
- 17 percent indicated there is a generational difference in work ethic,
- 15 percent said potential employees cannot pass a drug test,
- 10 percent indicated employees have good skills but need retraining for specific technical skills
- 8 percent indicated the overall workforce has good skills.

The chamber of commerce report showed that Kentucky employers need a workforce system that:

- responds efficiently to employers' needs for workers by employment sector/industry/skill set;
- is driven by accurate data on employers' hiring needs;
- provides flexibility in training and retraining programs;
- is accessible and user—friendly for employers; and
- provides clear, coordinated information on available public programs and supports.

In the area of service delivery, employers indicated that it is difficult to determine where to go or whom to talk to at the community level to meet their employment needs. This is linked to the organizational structure of the state's workforce system.

Employers indicated that they want to provide more input on the development of the state and local workforce plans by working more with the state workforce board and the Education and Workforce Development Cabinet on employer—led initiatives. They also want to be better informed about the availability of workforce programs.

In the area of employability, employers said one of their top concerns is having employees with good soft skills such as understanding the importance of showing up for work, taking responsibility for their actions, managing their time properly and communicating effectively.

Employers also listed the growing problem of drug use among job applicants. While drug abuse is not unique to Kentucky, it is a major problem in the Commonwealth. According to the survey, 15 percent

of employers said that applicants are unable to pass a drug test, so they are not viable candidates for employers regardless of their skills.

Employers asked that the state workforce system work with them in the area of credentialing by sectors so that employees have the skills needed for the workplace.

This chamber of commerce report outlines the needs of employers, providing Kentucky's workforce system viable information for making needed changes. In October 2015, the Kentucky Education and Workforce Development Cabinet partnered with the Kentucky Chamber of Commerce to host a Work—force Summit. Experts from industry and government shared insights and information about building a talent pipeline of workers; creating an employer—led collaborative to address specific workforce needs; using data to make decisions about training and hiring; and developing programs that let people learn new skills while gaining experience on the job. This collaborative effort is another step forward in addressing the challenges and unmet needs identified by employers in the Commonwealth.

Subsequently, the Kentucky Department of Workforce Investment held a WIOA State Plan Partner Round Table at the Kentucky Chamber of Commerce. Employers and partners from Adult Education, Economic Development, Vocational Rehabilitation, the Kentucky Workforce Investment Board, the Kentucky Department of Education and local workforce development areas participated. There were several prevalent themes that emerged from the round table discussion.

The top theme identified during the round table event was a lack of soft skills or employability skills, echoing an issue identified in the chamber survey.

The consensus of the group was intervention in this area needs to occur early in child development and continue throughout grades K—12. The group placed an emphasis on early intervention in the Career Pathways system for students. The Kentucky Federation for Advanced Manufacturing Education (FAME) project, a partnership of regional manufacturers whose purpose is to implement dual—track apprenticeship—style training, was highlighted by several individuals attending the round table as a model to replicate.

Another topic was ensuring a direct connection between occupational areas of demand and careers. Employers want to be actively engaged in this alignment process with the educational system. The group understands the differences in rural and urban areas of the state and that different connection approaches are needed to reach both of these areas.

Issues surrounding barriers to employment, such as substance abuse and criminal backgrounds and other socio—economic factors, were also identified by round table participants. The group highlighted the fact that there is an untapped labor pool of viable candidates in individuals with these barriers, as well as individuals with disabilities. Advances in technology allowing for needed accommodations have increased employability and skill sets of people with disabilities in the workplace. In partnership with the Office of Vocational Rehabilitation, Kentucky Adult Education provides information to local programs to assist students with barriers to employment to access the services for which they are eligible.

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’.

Kentucky has 10 workforce development areas (WDAs), each with unique employment trends. Un— employment rates and educational attainment vary significantly across the 10 WDAs. The larger and more urban WDAs have a greater employment percentage growth, lower unemployment rates and higher educational levels compared to the more rural WDAs. The improvement in the unemployment rates following the recession show the disparity in the economic recovery among WDAs. Educational levels are increasing across all of the 10 areas and the more rural WDAs, and those in eastern Kentucky have closed the educational attainment gap slightly but still trail the state level and the level in the larger urban WDAs. Additionally, the rural WDAs are experiencing limited or no population growth while the larger and more urban WDAs are growing much faster.

Partners who attended the State Plan Round table discussion identified the importance of addressing the gaps in opportunities and resources across the Commonwealth, a major priority for the workforce system over the next four years.

According to BLS, Kentucky’s seasonally adjusted unemployment rate was 5.3 percent in December 2015, representing a net change of —0.2 percentage points over the past year. Compared with neighboring states, Kentucky’s unemployment rate in December 2015 was higher than Virginia (4.2 percent), Missouri (4.4 percent), Indiana (4.4 percent) and Ohio (4.7 percent) and lower than Tennessee (5.6 percent), Illinois (5.9 percent) and West Virginia (6.3 percent).

While the state unemployment rate provides useful information on the general economic condition of Kentucky, it is important to note that there is wide variation in unemployment rates at the county level. For example, of the 120 counties in Kentucky, Woodford County had the lowest unemployment in the state in December 2015 at 3.5 percent while Magoffin County recorded the highest at 15.5 percent.

In Kentucky’s metropolitan areas, the BLS data for December 2015 shows that unemployment rates do not vary as much. For example, the following rates were reported for December 2015, Lexington (3.7 percent), Louisville (4.2 percent), Bowling Green (4.3 percent), Owensboro (4.5 percent), Elizabethtown (4.7 percent) and northern Kentucky/Cincinnati area (4.3 percent). As a secondary source of information about the employment picture, the June 2014 New York Times article “Where are the Hardest Places to Live in the U.S.?” listed several counties in Kentucky as having disproportionately high unemployment rates, including Magoffin County at 16.5 percent; Jackson County at 14.4 percent; Knott, Harlan, Letcher and McCreary counties at more than 13 percent; Clay, Perry and Wolfe counties at more than 12 percent; and additional areas reporting unemployment rates in the 10 to 11 percent range. Eastern Kentucky as a region was highlighted as fraught with challenges, such as lacking college graduates and high rates of unemployment, disability, poor health indicators and low median income.

Bluegrass

The Bluegrass WDA is projected to have employment growth from 380,303 to 403,006 jobs or 5.97 percent between 2012 and 2022 with 12,156 annual job openings, 3,303 from growth and 8,852 from separations. The unemployment rate reached 9.2 percent in 2009, dropped to 5.4 percent in 2014 and was 4.4 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in food preparation and serving related occupations, 1,949 jobs; followed by office and administrative occupations, 1,423 jobs; and sales and related occupations, 1,358 jobs. At the higher education level, healthcare practitioners and technical occupations, 862 jobs; and educational, training and library occupations, 961 jobs, are also growing.

The Bluegrass WDA ranks third in people ages 25+ with a high school degree or above, rising from 79 percent to 86.1 percent between 2000 and the 2010—14 ACS.

Cumberlands

The Cumberland WDA is projected to have employment growth from 108,577 jobs to 115,533 jobs or 6.41 percent between 2012 and 2022 with 3,518 annual job openings, 1,004 from growth and 2,514 from separations. The unemployment rate reached 11.8 percent in 2010, dropped to 8 percent in 2014 and was 6.9 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in office and administrative support occupations, 471 jobs; followed by sales and related occupations, 411 jobs; and food preparation and serving occupations, 371 jobs. At the higher education level, healthcare practitioners and technical occupations, 331 jobs; and education, training and library occupations, 186 jobs; are also growing.

The Cumberland WDA ranks ninth in people ages 25+ with a high school degree or more, rising from 61.6 percent in 2000 to 75.1 percent in the 2010—14 ACS.

EKCEP

The EKCEP WDA is projected to have employment growth from 119,361 jobs to 121,340 jobs or 1.66 percent between 2012 and 2022 with 3,618 annual job openings, 855 from growth and 2,763 from separations. The unemployment rate, which reached 13.5 percent in 2013 due to declines in coal mining employment, dropped to 10.8 percent in 2014, and was 10.2 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in office and administrative support occupations, 450 jobs; followed by healthcare practitioners and technical occupations,

386 jobs; and sales and related occupations, 385 jobs. At the higher education level, education, training and library occupations with 332 jobs, is also growing along with the healthcare practitioners and technical occupations.

The EKCEP WDA ranks 10th in people ages 25+ with a high school degree or more, rising from 57.8 percent in 2000 to 71.2 percent in 2010—14 ACS.

Green River

The Green River WDA is projected to have employment growth from 91,084 jobs to 104,991 jobs or 15.27 percent between 2012 and 2022 with 3,682 annual job openings, 1,589 from growth and 2,093 from separations. The unemployment rate reached 9.9 percent in 2009, dropped to 6.1 percent in 2014, and was 5.4 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in food preparation and serving occupations, 524 jobs, followed by sales and related occupations, 428 jobs, and production occupations, 381 jobs. At the higher education level, healthcare practitioners and technical occupations, 257 jobs, and education, training and library occupations, 221 jobs, are also growing.

The Green River WDA ranks fifth in persons ages 25+ with a high school degree or above, rising from 77.1 percent to 84.4 percent between 2000 and the 2010—14 ACS.

KentuckianaWorks

The KentuckianaWorks WDA is projected to have employment growth from 526,472 jobs to 566,485 jobs or 7.6 percent between 2012 and 2022 with 17,281 annual job openings, 5,017 from growth and 12,264 from separations. The unemployment rate dropped from 10.1 percent in 2009 to 5.9 percent in 2014, and was 4.7 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in food preparation and serving occupations, 2,120 jobs, followed by office and administrative support occupations, 2,023 jobs and sales and related occupations, 1,904 jobs. At the higher education level, healthcare practitioners and technical occupations, 1,335 jobs, and education, training and library occupations, 801 jobs, are also growing.

The KentuckianaWorks WDA ranks second in persons ages 25+ with a high school degree or above, rising from 81.3 percent to 88 percent between the 2000 and 2010—14 ACS.

Lincoln Trail

The Lincoln Trail WDA is projected to have employment growth from 95,567 jobs to 96,801 jobs or 1.29 percent between 2012 and 2022 with 2,961 annual job openings, 773 from growth and 2,188 from separations. The unemployment rate dropped from 11.8 percent in 2009 to 6.6 percent in 2014, and was 5.3 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in food preparation and serving related occupations, 439 jobs, followed by sales and related occupations, 361 jobs. At the higher education level, education, training and library occupations, 209 jobs, and healthcare practitioners and technical occupations, 197 jobs, are also growing.

The Lincoln Trail WDA ranks fourth in persons ages 25+ with a high school degree and above, rising from 76.1 percent to 85.8 percent between 2000 and the 2010—14 ACS.

Northern Kentucky

The Northern Kentucky WDA is projected to have employment growth from 184,758 jobs to 194,796 jobs or 5.43 percent between 2012 and 2022 with 5,798 annual job openings, 1,357 from growth and 4,441 from separations. The unemployment rate dropped from 9.9 percent in 2009 to 5.5 percent in 2014, and was 4.6 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in food preparation and serving related occupations, 941 jobs, followed by office and administrative support occupations, 841 jobs, and sales and related occupations, 692. At the higher education levels, education, training and library occupations, 335 jobs, and healthcare practitioners and technical occupations, 298 jobs, are also growing.

The Northern Kentucky WDA ranks first in persons with a high school degree or above, rising from 80.6 percent to 88.5 percent between 2000 and the 2010—2014 ACS.

South Central

The South Central WDA is projected to have employment growth from 119,704 jobs to 133,339 jobs or 11.39 percent between 2012 and 2022 with 4,297 annual job openings, 1,492 from growth and 2,805 from separations. The unemployment rate fell from 11.5 percent in 2009 to 6 percent in 2014, and was 4.8 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in food preparation and serving related occupations, 558 jobs, followed by office and administrative support occupations, 526 jobs, and sales and related occupations, 520 jobs. At the higher education level, healthcare practitioners and technical occupations, 261 jobs, and education, training and library occupations, 237 jobs, are also growing.

The South Central WDA ranks eighth in persons ages 25 + with a high school degree and above, rising from 70.3 percent to 81.3 percent between 2000 and the 2010—14 ACS.

TENCO

The TENCO WDA is projected to have employment growth from 67,124 jobs to 69,359 jobs or 3.33 percent between 2012 and 2022 with 2,204 annual job openings, 601 from growth and 1,603 from separations. The unemployment rate dropped from 11.4 percent in 2010 to 7.9 percent in 2014, and was 7.2 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in food preparation and serving occupations, 347 jobs; followed by healthcare practitioners and technical occupations, 301 jobs, and office and

administrative support occupations, 272 jobs. At the higher education level, education, training and library occupations, 144 jobs, along with healthcare practitioners and technical occupations mentioned above, are also growing.

The TENCO WDA ranks seventh in persons ages 25+ with a high school degree and above, rising from 71.6 percent to 82.1 percent between 2000 and the 2010—14 ACS.

West Kentucky

The West Kentucky WDA is projected to have employment growth from 129,142 jobs to 132,341 jobs or 2.48 percent between 2012 and 2022 with 4,132 annual job openings, 1,078 from growth and 3,054 for separations. The unemployment rate reached 10.3 percent in 2009, dropped to 6.9 percent in 2014, and was 6.2 percent in December 2015.

The greatest projected employment growth between 2012 and 2022 will be in sales and related occupations, 565 jobs; followed by transportation and material moving occupations, 500 jobs, and office and administrative support services, 440 jobs. At the higher education level, healthcare practitioners and technical occupations, 317 jobs, is also growing.

The West Kentucky WDA ranks sixth in persons ages 25+ with a high school degree or above, rising from 74.2 percent to 84 percent between 2000 and the 2010—14 ACS.

Individuals with Disabilities

According to data from the 2012 ACS, published in the annual Compendium of Disability Statistics, 17 percent of Kentucky civilians living in the community report having a disability, including 15.5 percent of residents of working age (18—64). This is higher than the national average (12.3 percent all, 10.2 percent working age). The rate of Kentuckians reporting a disability remained relatively stable from 2011 through 2012, growing at 1.1 percent (on par with the national average of 1.2 percent).

Employment rates are far lower for individuals with disabilities than in the general population. As of January 2015, the employment rate for the civil, non—institutionalized population 16 years and older was 68.2 percent and the unemployment rate was 5.9 percent (BLS, 2015). For adults with disabilities, the employment rate was 19.6 percent and the unemployment rate was 17.3 percent.

The most recent Kentucky—specific statistics for individuals with disabilities and employment are found in the 2013 “Disability Statistics Compendium,” produced by The National Institute on Disability at the University of New Hampshire. According to 2012 ACS data, Kentucky residents with disabilities are employed at reduced rates compared to residents without disabilities.

In addition, the 2012 ACS provides information on the employment gap between individuals with disabilities and those without, and poverty rates. It shows an employment gap in Kentucky of 46.7 percent and a poverty rate of 34.9 percent for adults with disabilities, compared to a poverty rate of 15.3 percent for adults without disabilities. These statistics underscore the relationship between disability, unemployment and poverty that is observed in Kentucky and nationwide.

Kentucky ranks near the bottom among states for labor force participation at 56.4 percent. The labor force participation rate varies substantially by region with labor force participation in eastern Kentucky substantially lower than in other parts of the state. This low regional labor force participation is due to economic transformation as coal jobs disappear and to a related informal economy that offers informal opportunities that do not officially represent labor force participation in those calculations.

The new administration is targeting increased labor force participation as a priority. If Kentucky was to increase its ranking among states from 46th to 25th, this would equate to approximately 150,000 more Kentuckians joining

the labor force. This goal is one that the new administration is publicly targeting in early workforce development discussions.

Skill gaps exist in Kentucky for the educational attainment levels in the high school diploma or less category. There are many more people in this educational attainment category than available jobs. See graph at kwib.ky.gov/supplydemandjobs.pdf.

While nearly 50 percent of Kentuckians age 25 or older have a high school diploma or less, only 38 percent of newly created jobs will require only this level of educational attainment.

While 28.4 percent of Kentucky's age 25—plus population is considered middle—skilled (some college through an associate degree), 34 percent of new jobs in Kentucky will be middle—skill jobs. Only 22.2 percent of Kentucky's age 25—plus population is considered highly—skilled (bachelor's degree or more), but 28 percent of new jobs in Kentucky will be high—skill jobs.

In the publication *Help Wanted 2012: Addressing the Skills Gap* by The Institute for a Competitive Workforce (ICW), a nonprofit, nonpartisan, 501(c)(3) affiliate of the U.S. Chamber of Commerce, Dave Adkisson wrote that there was a widening skills gap where the education and skills levels of Kentuckians don't meet the supply of jobs. This issue will become even more critical as thousands of Baby Boomers retire, leaving many well paying positions unfilled.

According to the National Skills Coalition (NSC), middle—skill jobs requiring an education after high school but not a four—year degree, make up the largest part of both Kentucky and U.S. labor markets. Key industries in Kentucky are unable to find enough sufficiently trained workers to fill these jobs. Fifty—eight percent of all jobs in 2012 were middle skill. NSC projects that between 2010—20, 54 percent of job openings will be middle skill; 29 percent will be high skill; and 17 percent will be low skill. Although 58 percent of Kentucky's labor market is middle skill only 48 percent of the state's workers are trained at that level.

The "No College=Low Wages" July 2014 report from the Kentucky Center for Education and Work—force Statistics (KCEWS) indicates that more than two—thirds of Kentucky's recent public high school graduates attended a college or university in some capacity within three years. Approximately 60 percent of those who didn't pursue post secondary education entered Kentucky's workforce. The remainder most likely moved out of state, joined the military, worked in agriculture or some other capacity which isn't reported to the state.

The Kentucky Cabinet for Economic Development published the Kentucky Economic Development Guide in 2015 that contained a section called *Closing the Skills Gap: The Workforce of the Future*. In the guide, employers indicated that they are constantly in need of skilled and educated workers. Finding and hiring skilled labor is a challenge for Kentucky employers. Brookings' 2013 analysis of the regional economy emphasized the Bluegrass Region of Kentucky, a 22—county area stretching from Louisville to Lexington, as particularly acute.

The Kentucky Community and Technical College System (KCTCS) is the largest provider of post secondary education and workforce training in the state. KCTCS provides services to more than 6,000 businesses and nearly 62,000 employees annually. Kentucky is committed to closing the skills gap. This requires bringing education and workforce together to define what closing the skills gap is.

It is essential that business, education, government and nonprofit partners work together to strength— en the talent pipeline and invest in the education of Kentucky's youth. Kentucky is committed to ensuring that instructional efforts are aligned to meet the needs of the business community in the Commonwealth. As a nation, it is clear that there is a skills gap in the science, technology, engineering and mathematics (STEM) areas. In Kentucky, those are areas where gaps exist as well.

Kentucky is working in various ways to develop a skilled workforce by combining education and training with on—the—job experience. One example of this is through the Kentucky Skills Network (KSN). KSN is a collaborative partnership of the Education and Workforce Development Cabinet, the Economic Development Cabinet, the Labor

Cabinet, adult education and KCTCS. The KSN consists of dedicated workforce professionals developing customized, solutions—based plans to serve employer and industry needs.

These regional KSN teams focus on the identified skills needs of key industries identified through targeted sector strategies and employer driven partnerships, and on developing immediate and long term strategies to fill identified skill gaps. Through the partnerships involved with this network of resources, KSN teams are able to provide funding for on—the—job training's developed in conjunction with employers, customized training incentives, pre—apprenticeship and apprenticeship training, short—term classroom training's, and various other resources in order to position Kentucky's workforce for global competition.

2. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

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

A. THE STATE'S WORKFORCE DEVELOPMENT ACTIVITIES

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

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

Kentucky offers a wide range of workforce education and training activities tailored to meet the needs of employers and job seekers in varied and unique communities across the state. The 11 certified full—service centers and three certified affiliate Kentucky Career Center (KCC) offices are the store— front, but the Workforce Innovation and Opportunity Act's (WIOA) core and optional one—stop partner services reach into the fabric and daily lives of those communities. An analysis of partner programs is provided below.

Employment Services

Kentucky issued a statewide co—enrollment policy in 2015. Co—enrollment allows partners to leverage resources while providing a more comprehensive service delivery strategy that meets the needs of customers with several barriers to employment. All adults and dislocated workers who receive KCC services other than self—service and informational activities must be registered and considered a participant for WIOA Title I services.

Career centers offer a full array of employment services to help adults and dislocated workers. UI claims can be made via the Internet or through a dedicated call center. Staff—assisted re—employment services are provided to UI claimants through case management activities such as assessment, individual employment plans, provision of labor market information and re—employment workshops.

Employers and job seekers are encouraged to use the self—service functions offered in the Focus Career and Focus Talent online systems for labor exchange activities, however staff also assist with services for customers desiring or in need of facilitated or staff—assisted service. The Burning Glass suite, Focus Talent and Focus Career, uses

artificial intelligence to provide accurate descriptions of job duties and job skills using industry recognized terms and also helps to ensure compliance with EEO and non—discrimination laws. Trained staff is available to provide individual service to customers upon request or in unique situations that require specialized assistance.

Customers using Focus in PY 2016 are broken down as follows:

- The number of active job seekers who created a Focus Career account — 68,252
- The number of employers who posted jobs in Focus Talent — 4,943
- The number of jobs posted in Focus Talent by the above employers (Talent Jobs) — 103,186
- The number of external jobs available through Focus Career — 956,660

Staff—assisted services to employers include hosting, sponsoring and collaborating to provide job fairs, screening and referrals of qualified job applicants and job order writing, and assistance with EEO compliance. Offices are strategically located throughout the Commonwealth within a couple of hours or less from any location in the state, and customers have access to online services 24 hours a day, seven days a week.

If customers are ready for employment after receiving career services, staff members assist them with job search and placement. If customers are determined to need individualized career or training services, they are referred to core and/or other partners to meet their identified needs.

WIA/WIOA Kentucky is improving the efficiency and effectiveness of its workforce services and programs as evidenced by the PY 2014 data, indicating Kentucky was 0.2 percentage points below the national unemployment rate. The number of dislocated worker participants remains well below the average of the previous 10—year period as the economy continues to improve. In fact, the number of dislocated workers served was at its lowest point since 2004.

The number of WIA—enrolled dislocated workers served in PY 2014 was 3,406 — a decline of 1,097 from the previous year for an approximate 24 percent decrease. This is a noticeable decline since PY 2009—PY 2013 when an average of 8,991 dislocated workers was served.

PY 2014 WIA—enrolled adult participants receiving intensive and training services showed a 16 per— cent increase from PY 2013. The number of adult customers seeking services (other than intensive and training) dropped 20 percent or 42,372 — from 212,043 to 169,671.

Recent statewide initiatives have focused on sector strategies and business services re—design. Following completion of its contract with Thomas P. Miller and Associates, the state implemented a business services framework developed in collaboration with the Local Workforce Investment Boards (LWIBs). A statewide training institute was conducted to educate and retrain those currently in the system as well as new partners. Resources were made available to each Local Workforce Investment Area (LWIA) to support specific operational adjustments and training needs to align with the new direction. OET has a dedicated business services staff lead at the state level.

Each of the 10 local areas must have at least one comprehensive KCC that provides physical access to core services: WIOA Title I (adults, dislocated worker and youth formula programs), WIOA Title II — Adult Education (AEFLA program), WIOA Title III — Wagner—Peyser Act employment services and WIOA Title IV — Vocational Rehabilitation Program and other required partners. In addition to the core programs for individuals with multiple needs to access the services, the following partner programs are often available to provide access through the one—stops: Career and Technical Education (CTE), 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 Farm Worker Jobs Program, Senior Community Service Employment Program, Temporary Assistance for Needy Families (TANF), Trade Adjustment Assistance Programs, Unemployment Compensation Programs and Youth Build. The governor intends to actively encourage TANF to co—locate in KCC offices but as an optional partner, not a mandatory one.

WIOA training will focus on the 30—plus state and local LWDA identified sectors. In addition to providing training service and follow—up, WIOA staff—assisted services will focus on providing:

- Comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which may include:
- diagnostic testing and use of other assessment tools and
- in—depth interviewing and evaluation to identify employment barriers and appropriate employment goals.
- development of an individual employment plan to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve his or her employment goals, including the list of information about the eligible training providers (as described in proposed § 680.180),
- group counseling,
- individual counseling,
- career planning,
- short—term, pre—vocational services including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct services to prepare individuals for un—subsidized employment or training,
- internships and work experiences that are linked to careers (as described in proposed § 680.170),
- workforce preparation activities,
- financial literacy services as described in sec. 129(b)(2)(D) of WIOA and proposed § 681.500,
- out—of—area job search assistance and relocation assistance, and
- English language acquisition and integrated education and training programs.

Kentucky Adult Education

The Office of Adult Education, also known as Kentucky Adult Education (KYAE), is uniquely poised to help the 367,000 adults in the Commonwealth without a high school diploma or its recognized equivalent to get a job, keep a job and advance in the workplace. Extensive planning and implementation of professional development to programs serving all 120 counties equips instructors to deliver high—quality, standards—based instruction in the context of workforce preparation, which is achieved by the integration of the KYAE Employability Standards. KYAE dedicates multiple resources to support instructors in providing contextualized instructional experiences that concurrently cover academic skills and essential skills. Within an individualized program of study, every student has multiple opportunities to practice and perfect the essential skills employers seek. These and continued efforts will better equip students with the essential employability skills that employers seek, which are critical to workplace success across all sectors and all levels of jobs. Regardless of a student's career path, every student served can benefit from opportunities to learn, apply and develop confidence in demonstrating these skills.

To further support the acquisition of employability skills, KYAE also provides access to a Worldwide Interactive Network (WIN) suite of college and career readiness preparation tools, at no cost to local programs. This resource was purchased jointly through a partnership with the Kentucky Department for Workforce Investment and provides access to any state agency outside of the K—12 system.

In 2016, KYAE will launch regional pilots to explore options for GED® credential—seeking students to concurrently complete training and acquire on—the—job experience in healthcare and manufacturing. With strong collaborations with the Area Health Education Centers, Kentucky Association of Manufacturers and multiple state partners, KYAE will identify replicable approaches to helping students secure jobs with family—sustaining wages.

KYAE is also working with WIOA partners to implement Team Based Case Management (TBCM) to set standards for establishing a system of collaborative case management among KCC partners. TBCM builds on the functional alignment within KCC and focuses on providing services to job seekers in a consistent, coordinated and efficient way. The systems and tools used in the TBCM approach reinforce functional alignment and integrated service delivery within the centers and among partners. See also Adult Education and Literacy Programs, Workforce Preparation and Integrated Education and Training.

Vocational Rehabilitation

The Office of Vocational Rehabilitation (OVR) provides support for education and training to eligible consumers in a number of ways.

OVR can provide supports for specific and appropriate job—related education and training if it is needed to prepare the consumer for a vocational goal that is aligned with the consumer’s interests, strengths and abilities. The goal is identified through a vocational assessment and is agreed upon between the consumer and a VR counselor in the Individual Plan for Employment. The education and training can occur in a variety of settings including, but not limited to, two—year community and technical colleges, four—year baccalaureate institutions, short—term training programs such as truck—driving schools, intensive training programs offered by community rehabilitation programs (CRPs) and other providers, and individualized training through supported employment providers. The supports OVR can provide can include, but are not limited to, tuition assistance, assistance with books and other supplies, note keeping, sign language interpreting, tutoring, rehabilitation technology, and other appropriate supports determined on an individualized basis.

Through guidance, counseling and partnering with KYAE, vocational rehabilitation counselors assist consumers in identifying their strengths and abilities, dealing with disability—related functional limitations, learning problem solving, and working through employment—related issues on their own. VR counselors train consumers to be self—advocates, making them aware of related laws such as the Americans with Disabilities Act (ADA), and their rights under those laws, particularly as they relate to workplace accommodations. OVR also assists consumers with disability—related work issues and assisted technology options in the workplace. OVR, principally through its job placement staff, provides disability awareness training to employers. Job placement specialists provide employers with resources they can access for assistance in accommodations and work with employers on appropriate methods of interviewing potential employees with disabilities.

Beyond training to develop specific job skills, OVR staff works with consumers on interviewing skills, resume writing, and job searches, often using mock interviewing as a tool to prepare them for job interviews and to know the types of questions that employers may ask. Consumers are also trained on what questions can and cannot be asked in an interview to someone with a disability and to someone with a criminal record by law. OVR prepares consumers for the barriers and struggles they may face when they start trying to find employment and help them to find employers that will work with them.

OVR staff also advises consumers on how to write resumes that will appeal to an employer and teaches them how to search for a job and discover the hidden job markets. OVR also uses different work sites as community—based job training and work adjustment while providing a training stipend for the hours spent on the work site. This can particularly help with soft skills, such as being on time for work, filling out a timesheet, using email, and dealing with co—workers and supervisors. In addition to utilizing its own staff, OVR enlists community rehabilitation programs to develop these soft skills in many of its consumers. OVR can also provide eligible KYAE students with needed supports to re—move barriers impeding their GED preparation and preparation for post—secondary training programs.

OVR can work with consumers on internships, apprenticeships, and on—the—job training arrangements as additional options on the career pathway to employment. These options allow individuals to train while being actual employees.

OVR also provides training directly at the residential training center it operates, the Carl D. Perkins Vocational Training Center (CDPVTTC). Soft skills are taught as a part of the Work Adjustment Program (WAP) at the center. CDPVTTC also offers the Academic and Life Skills Program of Higher Achievement (ALPHA) and the GED program. The ALPHA program provides instruction and support for students who want to complete vocational training or post—secondary education. Some students may also require a GED to gain employment or continue their education.

The Life Enhancement Program (LEP) at CDPVTTC can help fill in necessary steps in the career path— way by providing classes in anger management and stress management, among others. A number of short—term options are available at the center for consumers who may not want or be able to attend college. These short—term training options include: auto lube/detail, cosmetology, child care development, custodial/building maintenance, food service, grounds—keeping, industrial truck operation, and materials management. The center is intended for individuals who need intensive supports and ancillary services such as physical therapy, speech therapy, and occupational therapy, among others, all provided on—site.

OVR provides individualized blindness skill training through the Charles W. McDowell Rehabilitation Center in Louisville. The process of determining the type of training and education needed to make a consumer successful in obtaining employment is very individualized.

Services related to education and training provided by OVR must be focused on individuals with disabilities achieving competitive integrated employment goals that match their interests, skills and abilities

OVR has staff that specialize in services to the blind and visually impaired, providing education and training to its consumers through a variety of settings and the deaf and hard of hearing.

B. THE STRENGTHS AND WEAKNESSES OF WORKFORCE DEVELOPMENT ACTIVITIES

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

Strengths- • As was noted in Kentucky’s initial state plan submission, a strength here is a true commitment to cross-cabinet collaboration and to collaboration and service integration among WIOA partners.

In light of the Kentucky HEALTH Community Engagement effort, collaboration between the human service and workforce systems overall and between the state cabinets and their staff as well as the nonprofit partners associated with both worlds has never been deeper. Collaboration for its own sake is nice to have, but not sufficient from a customer experience nor a performance standpoint. However, in the coming few years Kentucky aims to leverage the partnership to establish a new model of integrated and holistic services for customers and achieve better health AND employment outcomes.

- Kentucky has worked hard to achieve an effective balance in its approach to serving Unemployment insurance customers. Newly implemented operational changes have improved the ease of use and accessibility of online claims filing and assistance, and have added centralized assistance line capacity to handle routine transactional needs of customers. Career center staff are thus more available for re-employment and career coaching assistance. Kentucky is in the process of increased staff training and customer flow improvements that will correspond well with the above noted focus on service integration.

- The aging case management technology currently hosting Title I and III customers, previously noted as a “weakness” in Kentucky’s state plan, will be replaced beginning in October of 2018 by a Salesforce platform case management system called KEE Suite. In October of 2019, the Title IV case management system will also be replaced. Additionally, Kentucky’s legislature is expected to pass a “Service Capacity Upgrade Fund” that will enable the replacement of the Unemployment customer systems over the next five years. Thus, Kentucky is on the threshold of moving a previously noted “weakness” into the “strength” column.

- Kentucky has also made substantial progress in aligning its workforce and educational programs and pathways with the needs of employers, through the work of the Kentucky Workforce Innovation Board, the Kentucky Department of Education, KCTCS, and the core WIOA partners.
- A final strength that must be noted in the context of Kentucky’s workforce programs is its state longitudinal data system. The Labor Market Information programs and grants are now managed together with the SLDS at the Kentucky Center for Education and Workforce Statistics (KCEWS). This movement and subsequent integration with the tools, resources, and interactive data available there has added a great deal of expertise and capacity and Kentucky expects to leverage LMI data even more for employer and individual customers in the next few years.

Weaknesses

- Kentucky would like to see improvements in performance data, both in the quality of the data and in the results experienced by customers across the commonwealth. As Kentucky works towards systematically both improving and broadening the approach to data collection and analysis, the first step is the creation and implementation of a set of statewide performance metrics measureable “real time” at all career centers, in addition to the federal performance measures. The next step is the addition of interactive and review tools like dashboards that will improve accountability and understanding of underlying performance issues. These analytics will ultimately allow Kentucky to make more informed decisions about both approaches to data collection and to service delivery.
- Over the past six months, Kentucky has done a complete review of its Trade program and is in the process of implementing a series of program improvements. More focus will be placed on the case management aspect rather than the traditional training aspect. In the past, Trade has been viewed as an “automatic entitlement to training.” Kentucky wants to change that mindset and increase the upfront career services to increase the engagement to employment for Trade participants who are ready and able to return to work.
- As Kentucky only recently (September 2017) completed the move of transactional UI assistance to the assistance line, career center/Wagner Peyser staff accustomed who were spending the majority of their time providing such assistance now require additional training and skill development in job placement and career coaching in order to provide the assistance required.

C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

On the positive side, Kentucky has strong partnerships and a network of certified career centers that will assist in delivering the workforce activities described above.

Capacity limits and challenges include:

- A budget environment with low likelihood of securing state funds for workforce efforts, and escalating technology, pension and staffing costs that are not supported through growth in either federal or state funds.
- Technology challenges in that the capacity to deliver on the integrated service model and ideal may be limited by Kentucky’s ability to implement system—wide case management and reporting solutions.

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.

The Kentucky Workforce Innovation Board voted on February 15, 2018 to advance to the Governor for his approval a new five-year strategic plan. The plan lays out the following four goals for the Commonwealth's workforce system:

1. Employers: Actively engage employers to drive Kentucky's workforce development system.
2. Education: Align and integrate P12, adult education and post-secondary education to provide lifelong opportunities for Kentuckians that prepare them for the rapidly shifting realities of work in the future.
3. Workforce Participation: Increase Kentucky's workforce participation by creating opportunities, incenting workforce participation, and removing employment barriers for Kentuckians.
4. Organization and Resource Alignment: Focus resources on the most effective initiatives and improve the return on our workforce investment, utilizing data to constantly improve workforce development in Kentucky.

These four goals of intensifying engagement and services with employers, better aligning our education system with job opportunities now and in the future, improving our workforce participation and improving the functioning of the workforce system and its partners are all goals that can clearly be served and supported by continuing effective implementation and delivery of WIOA and its requirements.

In addition, in January of 2018 Kentucky became the first state in the nation to gain Federal approval for a "community engagement" requirement for Medicaid recipients: that they work, complete education programs or job training, or volunteer in their communities. The requirement will be implemented during the course of this State Plan by the workforce development boards, their contractors, and other workforce partners and will push Kentucky to grow and evolve its workforce system to be more comprehensive, more aligned not only primarily with employers but also with the human service infrastructure in the state, and simply BETTER at assessing the individual needs of customers and helping them find a path to self-sufficiency for themselves and their families.

Achieving the vision and goals set forth in the new KWIB strategic plan, together with delivering successful implementation of the KY Health Community Engagement, will be the critical priorities of all WIOA partners during the remaining period of this State Plan.

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.

* 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.** WIOA provides federal funds to assist states and local workforce development systems to increase the employment, retention, earnings and occupational skill attainment of workers, particularly those individuals with barriers to employment. Kentucky has programs and supports in place in serving individuals with barriers to employment. Over the past six years, initiatives in place under the WorkSmart plan have increased the collaborative partnerships of the workforce system. This will allow individuals with significant barriers to employment opportunities to succeed in training programs to enter in-demand occupations. All Kentuckians will have access to employment in a fulfilling and meaningful career. Individuals with barriers to employment, as defined by the WIOA and Kentucky, include the following.

Long-term Unemployed In Kentucky, transitional jobs are a new type of work-based training allowed under WIOA. Transitional jobs are subsidized time-limited work experiences in public, private or nonprofit sectors for barriers-to-employment individuals who are chronically unemployed or have an inconsistent work history and are combined with comprehensive career and supportive services. The goal of transitional jobs is to establish a work history for the individual who demonstrates work-place success and develops the skills that lead to entry into and retention in unsubsidized employment. When individuals apply for unemployment, they are required to register in Focus Career, Kentucky's employment website. The Kentucky Employment Network (KEN) works with unemployment insurance (UI) customers who are profiled as likely to exhaust UI benefits. KEN consists of a workshop that informs the customer of the programs available through the Kentucky Career Center (KCC). Re-employment Services and Eligibility Assessment (RESEA) works with UI customers who are profiled as likely to exhaust UI benefits. The grant activities consist of KCC orientation, job search overview, Individual Employment Plan and referral to job services. Kentucky's KCCGO! National Emergency Grant received in June of 2014 has provided the state with a chance to test and deliver comprehensive services and career pathways to the long-term unemployed. The focus of this grant is to serve 1,700 long-term unemployed, likely to exhaust UI benefits, and/or profiled dislocated workers. Services include on-the-job training, customized training and apprenticeships. Funds are used to provide services such as coaching, counseling and direct job placement. In addition to expanding work-based learning strategies, funds may be used to further develop and strengthen partnerships between workforce and industry organizations and align services with other federal, state and local programs. This grant expires Sept. 30, 2016, but Kentucky has submitted a no-cost, period of performance extension request. If approved, the grant will go on through June 30, 2017.

Homeless Individuals KCC staff and Jobs for Veterans State Grant (JVSG) staff collaboratively address homeless veteran needs across the state. Additionally, homeless individuals receive adult WIOA priority of service, as reflected in Kentucky's Priority of Service policy No. 16-006. All local areas receiving youth formula funds provide services to eligible youth who determine homelessness to be a barrier. Local referral processes, per infrastructure agreements, help with identifying additional community support for homeless individuals. Serving this population effectively requires a strong partnership with state and local human service partners. This kind of partnership is of great interest to the new administration and is likely to be a priority over the next four years.

Displaced Homemaker The Office of Employment and Training (OET) provides WIOA basic career services statewide through the KCC offices. WIOA individualized career and training services may be provided to the displaced homemaker who is determined to be a dislocated worker. Individual dislocated worker status is based on: • Individual has been providing unpaid services to family members in the home and has been dependent on the income of another family member but is no longer supported by that income; or • The individual is the dependent spouse of a member of the Armed Forces on active duty and whose family income is significantly reduced because of a deployment, a call or order to active duty, a permanent change of station or the service-connected death or disability of the member. Additionally, the individual is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment. Eligibility for these services is determined by WIOA career planners, located in KCC offices across the state.

Local boards, under WIOA, have an increased focus and collaboration with TANF. It is anticipated that this collaboration will result in increased awareness, identification and referrals.

Older Individuals In Kentucky, Experience Works offers employment training services through the Senior Community Service Employment Program (SCSEP) to low-income older workers in 60 counties in Kentucky. Experience Works partners with local 501 (c)(3) not-for-profit agencies in each of the counties we serve as training sites for participants. Experience Works also actively collaborate with local and public employers to create permanent employment opportunities for older workers who want to re-enter the workforce.

Ex-offenders One of the specified barriers in the Act is the ex-offender. In serving this target population, the core partner agencies will coordinate and better align services with criminal justice agencies in serving ex-offenders. Innovative pilot programs will receive funding through a set-aside in the governor's discretionary budget. Office of Vocational Rehabilitation works closely with this target population in providing services, supports and referrals to other programs as needed. Kentucky Adult Education partners with the Department of Corrections to serve both full service jail correctional offenders and state adult institution inmates. Adult educators provide educational services to those in jail based on cooperative agreements with jailers. KCTCS faculty is commissioned to serve state adult correctional institution populations; however, adult educators support those educational experiences, offering evening classes for offenders. Current LWDA local plans indicate a variety of involvement and engagement with the ex-offender population and a keen awareness of the needs of these individuals. For example, the TENCO LWDA states in its plan: "Offenders often have a difficult time locating employment. Therefore, TENCO will reach out to our local detention center and prison to determine if job preparation training would be considered beneficial." Another LWDA, KentuckianaWorks, indicated in its KCC service delivery agreement that the Kentucky Department of Corrections was one of its required one-stop partners. The partner program was listed as Reentry by Design/Big Brothers Big Sisters: Mentoring Children of Incarcerated Parents; Program Authority-Second Chance Act of 2007 Programs. Other transitional local plans indicate linkages and referral processes for ex-offenders. Jobs for Veterans State Grant (JVSG) is a \$2.4 million grant administered by OET with staff located in the Kentucky Career Center offices statewide. Those who are both veterans and ex-offenders fall within a category specified to be served under this grant. Currently, the state coordinator receives a monthly list of every incarcerated veteran in Kentucky from the Department of Corrections; those in local jails and state facilities, with their release dates. The nearest disabled veterans outreach program specialist (DVOP) reaches out to these individuals to offer re-entry employment preparation and support services prior to release, when possible. After release, JVSG staff work with the each individual from their KCC office. KCC partners with the Department of Corrections (DOC) and Adult Education to provide training and assessments toward achieving a National Career Readiness Certificate (NCRC) for anyone during incarceration. On Jan. 1, 2016, DOC began offering 30 days of "good time" off on sentences of individuals who earn an NCRC. After release, KCC offers a complete portfolio of services to ex-offenders. As a population with barriers to employment, they are entitled to additional WIOA services facilitated OET's NCRC coordinator. Work Opportunity Tax Credit (WOTC) - A special tax credit is available to employers who hire qualified ex-felons. The qualified ex-felon is an individual who has been convicted of a felony or released from incarceration for a felony conviction within 12 months prior to the individual's start date.

Persons with disabilities, including youth OVR provides many supports for education and training to those who are eligible. The agency provides supports for specific and appropriate job-related education and training if it is needed to prepare someone for a vocational goal that is aligned with his or her interests, strengths and abilities inclusive of students and youth. The goal is identified through a vocational assessment and is agreed upon between the person and a VR counselor in the Individual Plan for Employment.

Youth in, or formerly in, foster care Kentucky will use funds to ensure that all youth program elements are made available to youth. The state supports the local workforce areas in designing youth programs tailored to the needs of in-school- and out-of-school youth in local communities. OET youth program staff members disseminate updates and guidance from the U.S. Department of Labor and others. Areas have designed special referral processes for youth who come into one-stops, and one area has developed a one-stop career center specifically for youth. Eligible WIOA youth with this barrier are described as an individual in foster care or who has aged out of the foster care system or who has attained 16 years of age and left foster care for kinship guardianship or adoption, a child eligible for assistance under sec. 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement. The Kentucky Workforce Innovation Board (KWIB) strategic plan has incorporated a variety of approaches for expanding and enhancing outreach to youth. An example is the High School Outreach initiative designed to increase communication and collaboration between workforce boards and boards of education, technical education, post-secondary education and economic development. Another example is a recent collaboration with the Cabinet for Health and Family Services (CHFS) to assist youth in career exploration and planning as they complete summer jobs in CHFS local offices.

English language learners Throughout the Kentucky Career Center offices, services are provided to all participants regardless of what barriers they face, including Limited English Proficiency (LEP). If a customer requires LEP services, all KCC staff have access anytime to phone translation services through Interpretalk. Information on how to access this system is located within the OET's Limited English Proficiency Plan, which is housed in the Team of Experts section of the KCC website. Additionally, the KCC Team of Experts site houses many other forms and materials needed for LEP individuals and have been translated. If a customer has additional document or form translation needs, KCC staff may send these documents to the OET Equal Opportunity Office to be translated into the necessary language. Posters in both Spanish and English are available in all KCC offices notifying individuals of their rights to service and the proper channels to follow if they feel this need has not been met. Adult English language learners, including individuals who may have earned degrees in other countries, may receive services that enable them to achieve competency in English language and acquire the basic and more advanced skills needed to function effectively as parents, workers and citizens. This includes English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation. It may also include workforce training.

Migrant/seasonal farm workers Kentucky has a unified migrant seasonal farm worker (MSFW) program that unites MSFW outreach representatives. Its mission is to support agricultural employers and farm workers through a highly effective labor exchange system while ensuring that employer and worker stakeholders are aware of their rights, responsibilities and protections using an efficient and collaborative service delivery process.

Single parents/pregnant women WIOA youth formula funds will be used to address the needs of eligible youth who have the identified barrier as pregnant or parenting. Career Center partners will work closely with Department of Community Based Services (DCBS) to assure customers have knowledge and access to needed resources. One-stop partners are directly involved with two Supplemental Nutrition Assistance Program (SNAP) grant initiatives with DCBS. Paths to Promise (P2P) is a pilot program with a robust research component serving eight counties in Eastern Kentucky. The pilot includes moving eligible students into AOKY career pathways. The subsequent location of employment and training funds will be dedicated to providing support services to students pursuing education and training in urban areas across the state.

Veterans Each career center office, along with each of the 10 local areas, provides "Priority of Service" to veterans for all Department of Labor funded programs. Each customer entering the local office receives a questionnaire that is used to determine whether the customer is priority-of-service eligible. If the customer is an eligible "covered person," he/she receives a fact sheet listing all of the services and programs along

with the program's qualifications, which must abide by the Priority of Service mandate. The covered person is then seen by the first available staff person or referred to the disabled veterans program specialists if they are determined to have one of the significant barriers to employment as specified by the appropriate veterans program letters. Additionally, Kentucky's Focus Career system automatically contacts veterans matched to new job orders 24 hours before non-veterans.

Individuals facing substantial cultural barriers English Literacy and Civics (EL/C) programs in Kentucky continue to use a variety of activities and instructional methods to enhance non-English speaking student's effective communication skills and civic practices. Additionally, programs sponsor cultural activities, such as holiday and international celebrations during which students are invited to bring indigenous food and share their own cultural traditions. These efforts help non-native English speakers navigate and participate in their children's educational experiences, access services and participate in community activities.

Low Income Services provided to low-income individuals are reflected in Kentucky's WIOA Priority of Service policy that provides guidance on the service requirement for Title I Adults for both individualized career services and training services. Priority applies to recipients of public assistance, other low-income individuals and individuals who are basic skills deficient. A low-income individual is defined in Section 3(36) means an individual who: Eligible WIOA in-school youth must be low-income, unless a local area applies the 5 percent low-income exception. WIOA out-of-school youth are not required to be low-income unless the barrier requires additional assistance to enter or complete an education program or hold employment or is a recipient of a secondary school diploma or its recognized equivalent and is basic skills deficient or an English language learner. Service priorities for all populations with barriers to employment The WorkSmart Kentucky Plan has driven significant changes and improvements in the workforce system since 2010, as well as informed other related strategic initiatives like Kentucky's participation in the NGA Talent Pipeline Academy. The following 2010-13 goals will continue to inform and guide the system during this transition period and to build career pathways for individuals with barriers to employment. To provide determining factors for the goals of Kentucky's strategic plan, a series of objectives was developed. Each set of objectives supports a specific goal and provides the framework for the development of action steps as well as a basis for monitoring and evaluating the implementation of this plan. Align Kentucky's workforce development system with its education objectives. • Increase communication and collaboration between workforce boards and boards of education, technical education, post-secondary education and economic development; • increase the number of post-secondary and work ready high school graduates; • promote educational options, including technical education, two-year and four-year college, apprenticeships and specialty training to younger students; • increase awareness of educational and skills requirements for high-demand jobs, as well as those in emerging industries; and • establish the concept of life-long learning as a norm in the 21st century. Align Kentucky's workforce development system with economic development strategies. • Increase communication and collaboration between workforce boards and economic development agencies; • develop "rapid response" framework for new jobs based on model for layoffs; • refine and promote evolving methods of projecting jobs and training needs of the future; and • increase opportunities for entrepreneurship in a culture of innovation.

Simplify the workforce development service delivery system. Transform the workforce system. • Simplify online services and focus on innovative user-friendly applications; • promote a truer identity of the unemployment office; • increase the awareness and use of online job matching and training services; • increase use of job portal by employers and job seekers; • reduce confusion and information overload for those unfamiliar with the system; and • increase communication among all service delivery points. Improve service to achieve a customer-centered delivery system. • Increase awareness that clients of the workforce system include those with jobs to fill as well as those seeking a job; • decrease wait time for services, increase use of workforce system as a resource for employers to identify, screen, match, interview and prepare candidates for work; • provide customer service training to all service delivery staff; • increase use of online tools and resources; • provide up-to-date resources for all clients; • increase contacts with employers and economic development agencies regarding future workforce needs; and • develop

benchmarks and base-line standards for consistency within the system (physical, program and customer services) while allowing for local and regional adaptation.

Working under a grant from the NGA Policy Academy for Aligning the Education and Training Pipeline to the Needs of the Economy, in 2015 Kentucky assembled a team including key leaders from economic development, workforce and education together with the Kentucky Chamber of Commerce to develop an Economic Competitiveness Agenda. The agenda showcases two large projects: Career Pathways and Sector Strategies. Both efforts are still actively underway and are reflective of a true system mindset, integrating education, economic development and workforce development policy and practice. The following goals of the Economic 2015 Competitiveness Agenda spring from the WorkSmart Kentucky Plan and will inform the new administration and new KWIB as together they sustain and expand the competitiveness of Kentucky's economy and engage in a new round of strategic planning. Goal 1: Career Pathways and Sector Strategies — Collaborate with business and industry to define career pathways for critical state and regional sectors. • Refresh our state and regional sectors requiring a skilled workforce and lead to well-paying jobs; • Establish an employer-led partnership model to encourage regional solutions that combine the resources from grade K-12, higher education, adult education, business and industry to implement career pathways aligned to industry sectors; • Collaborate with business and industry to define the pathways and clearly define skills and competencies required for successful completion of courses through an employer-led processes; • Establish clearly defined assessments and measure of skills and competencies that lead to stackable certifications meeting requirements of business and industry; • Create a regular employer-led review process of career pathways, coursework and assessments/measurements to ensure alignment with business and industry needs; • Continue to support models such as KY FAME and integrate dual credit within that framework; • Collaborate with the vocational rehabilitation agencies on the Career Pathways grant through the Rehabilitation Services administration; • Increase educational attainment for populations with barriers; close educational achievement gaps for low-income, minority, and under-prepared students; and increase workforce participation in high demand occupations through expanded partnerships. Goal 2: Work-Based Learning Infrastructure — Create a state-level framework to facilitate employer engagement in work-based learning and ensure consistency in definitions used across the education and training continuum partners regarding definition. • define it • governance structure that is partnership-based • standardized continuum • asset map • identify best practices at every level • create Kentucky model • implement and model • communication strategy

Goal 3: Workforce Services Infrastructure Realignment — Continue to evaluate and realign services and support structures to expand on efforts to build a truly customer-centric model at the local level. • Streamline business customer resources with a dual customer focus for job seekers and employers by aligning training, education and employer needs; • Align and coordinate workforce and education programs that will be accessible for all individuals including populations with barriers to employment assuring that everyone has access to a marketable skill set and the level of education needed; • Regionalize service delivery where boxes fit on top of each other, aligning programs and services to benefit all customers and maximizing the impact of partner resources; • High quality standards/performance metrics and reporting related to education and training resources; • Merge state- and locally-based area technology centers and more closely align their operations and offerings with the community college system; • Provide career counseling at every high school and career center that provides access to training and education programs based on local, regional and state labor market trends. Goal 4: Data and Performance-Informed Decision Making — Ensure the collection of the right data to inform policy and practice among the partners to create an efficient and effective talent pipeline. • Identify what data we have and what we need (data mapping); • Work closely with core partners to develop performance accountability measures that effectively serve Kentuckians inclusive of individuals with barriers to employment; • Develop and execute required data sharing agreements with partners; • Accountability model for education continuum — process and progress measures; • Use data to develop creative state financial strategies (i.e. KEES, non-traditional students, sector-driven) that support credential and educational attainment of target

populations; • Ensure adequate analysis and reporting of required common metrics. Other goals will inform the next four years of workforce system strategy and transformation. Stronger by Degrees for 2016-21 is a six-year plan to intensify Kentucky's strong focus on improving opportunity for citizens and building a stronger economy through increased educational attainment at all levels - certificates, associate and bachelor degrees and more. This plan is the product of hundreds of hours of work and thought from hundreds of contributors, including members of the Council on Post-secondary Education, campus leaders, faculty members, students, state agencies, policy leaders, representatives from the business community, the Kentucky Higher Education Assistance Authority, the Education Professional Standards Board, P-12 educators and administrators, and the public at large through a series of policy forums and town hall meetings: • Improve the diversity and inclusiveness of Kentucky's campuses through the statewide diversity planning process and related initiatives. • Partner with Kentucky's P-12 system to increase the number of students ready to enter a post-secondary degree or certification program. • Increase participation in post-secondary education, particularly among traditionally under-served populations. • Improve the education and skill levels of Kentucky Adult Education students to prepare them for careers and/or post-secondary education. • Expand financial access to post-secondary education. • Kentucky will be stronger by ensuring that many more individuals complete a post-secondary degree or credential, and that they graduate with the skills and abilities to be productive, engaged citizens.

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.)

This is ongoing and will be finalized once federal guidance is received.

4. ASSESSMENT

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

The Kentucky Chamber of Commerce report referenced earlier in this plan also included a recommendation to conduct an independent review and assessment of the workforce investment system. The new administration is currently reviewing this recommendation and will determine a best course of action that includes both qualitative and quantitative reviews. Once the assessment is developed and completed, Kentucky will analyze the results, evaluate the programs and services offered to employers and job seekers and identify service trends. Information gained from this and other assessments will be used in strategic planning process and goal setting. The Kentucky Workforce Innovation Board (KWIB) will embark in the fall of 2016 on a strategic planning process that may include some form of survey or assessment. KWIB data gathering and strategic planning will also help Kentucky implement the WIOA requirements in building its strategic vision and goals for the state workforce system. The Economic Competitiveness Agenda includes the following focus on data and performance informed decision making: "Ensure the collection of the right data to inform policy and practice among the partners to create an efficient and effective talent pipeline." Ongoing assessment from multiple sources will provide the framework needed to measure program and service effectiveness, efficiency and satisfaction. Kentucky will build a workforce investment system assessment that combines the results of the independent review and the collection of common performance measures and aligns those results with program improvements and innovations. Basic service delivery performance standards will be set to continuously improve. New comprehensive WIOA service delivery ideas and standards will be added over time to help ensure that common measure and customer satisfaction results go up over time. Kentucky will add to this basic approach and develop broader continuous improvement activities for across the workforce system. Kentucky will evaluate statewide cross-program common data elements and gain information on the job seeker and employer

programs, services and processes on an ongoing basis. This provides the assurance that the strategies and action steps in place add value to the services delivery process and there is evidence of continuous improvement. This will allow the Kentucky Workforce Innovation Board, along with the core program and additional partners, to be committed to an aligned cohesive service delivery system with a shared understanding of policy and performance.

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).

The WorkSmart Kentucky plan demonstrates a commitment to leveraging state and federal resources focused on workforce investment across state government. The process to develop the strategic plan involved all board members representing a variety of agencies, businesses and community partners. Focus groups consisting of business people, customers and staff were conducted. Each of the 25 action steps included in the WorkSmart plan is grounded in partnerships across state government.

The WorkSmart Kentucky plan maximized business and industry involvement, as well as partner agency and local workforce professional participation in the development of the strategies, goals and vision. This extensive engagement process created a sense of ownership in the plan. A critical success factor for this project is the engagement of the employer community with economic development, educators, elected officials and the workforce system. A primary goal of the KWIB strategic plan is to align the state's workforce development system with economic development strategies.

Kentucky plans to develop and implement strategies in five areas named in the multi—partner NGA Talent Pipeline Academy Economic Competitiveness agenda.

Under the first of the five, the Career Pathways and Sector Strategies pillar, Kentucky will collaborate with business and industry to define career pathways for critical state and regional sectors.

Career Pathways

The WorkSmart Kentucky plan includes several strategies that will continue to inform career pathway and sector work in the Commonwealth including:

- connect career pathways for all levels of education based upon data—driven information and employer demands;
- increase communication and collaboration between education, workforce boards and economic development agencies as specifically related to industry demand and supply of the needed talent pipeline;
- develop sector based “rapid response” framework for career pathway initiatives; and
- implement a sector strategy culture as a focal lens for services, resources, and delivery.

Over the next four years, Kentucky will build upon the above strategies and:

- support the development of employer—led collaborative as recommended by the Kentucky Chamber of Commerce to guide workforce initiatives in cooperation with business and industry associations;
- refresh our state and regional sectors requiring a skilled workforce and leading to well-paying jobs;
- establish an employer—led partnership model to encourage regional solutions that combine the resources from K—12, higher education, adult education, and business and industry to implement career pathways aligned to industry sectors;
- collaborate with business and industry to define the pathways and clearly define skills and competencies required for successful completion of courses through employer—led processes;
- establish clearly defined assessments and measures of skills and competencies that lead to stackable certifications meeting requirements of business and industry;
- create a regular, employer—led review process of career pathways, course work and assessments/measurements to ensure alignment with business and industry needs; and
- continue to support models such as KY FAME and integrate dual credit within that framework.

The Career Pathways program aligns major education, training and workforce development programs to meet the skill needs of students, job seekers and workers and the skill requirements of employers

in high-demand industries and occupations. In 2002, the Ford Foundation selected the KCTCS to participate in its Community College Bridges to Opportunity Initiative. The “Bridges Hypothesis” was developed by the Ford Foundation to address the fact that the separation of remedial, workforce and academic missions fail to promote economic and academic advancement for disadvantaged students. Several key stakeholders were engaged in the implementation and institutionalization of strategically designed state education policy initiatives.

KCTCS embraced the Career Pathways model as a strategy for achieving this mission integration. The goal of the Career Pathways program is to link academic credits and credentials with a seamless system of career exploration and preparation and skill upgrades, and to provide multiple entry and exit points spanning secondary, post-secondary, adult and workplace education.

In Kentucky, the Career Pathways program is developed, implemented and maintained through partnerships among secondary and post-secondary education and employer partners.

The Career Pathways program includes rigorous academic and career courses beginning in high school and leading to an associate degree and/or industry—recognized certificate or licensure, and/or a baccalaureate degree and beyond. The program connects academic and career courses with support services that enable students to combine school and work and advance over time to better jobs and higher levels of education and training.

Accelerating Opportunity

Accelerating Opportunity is aimed at creating effective pathways to credentials for low-skilled adults (testing at a sixth—12th academic grade level) so they can earn the credentials they need to get a family sustaining job. The initiative seeks to reform how education is delivered to low-skilled adults by integrating basic skills education with technical training while providing wrap around services that include instructional and career supports for adult learners. The initiative is informed by I—BEST, an accelerated, integrated instructional model in which adult education and technical instructors work together in the classroom.

Project Creating Access to Successful Employment (Project CASE)

Kentucky strategies have and will continue to support WIOA's focus on low-income adults and youth who have limited skills, lack work experience, and face other barriers to economic success. VR is a full and actively engaged partner in the Kentucky workforce system. OVR is actively engaged in the planning process, on committees and staff, serving as project directors on some of the KWIB initiatives. They are advocates in the workforce system for individuals with disabilities. Please refer to the Vocational Rehabilitation section of this combined plan for a comprehensive listing of goals and strategies.

In October 2015, Kentucky was awarded the Career Pathways for Individuals with Disabilities Model Demonstration Program Grant (CFDA 84.235N). This federal grant was provided through the Rehabilitation Services Administration (Department of Education) to create a program that would result in greater participation of VR-eligible individuals, including youth with disabilities, to acquire marketable skills and recognized post-secondary credentials necessary to secure competitive, integrated employment in high-demand, high-quality occupations.

This five-year grant award of nearly \$4.4 million is named Project CASE (Creating Access to Successful Employment). Project CASE has strong support from the leadership of OVR, OET, KYAE and the Department of Education.

Project CASE activities are consistent with the section 101(d) of WIOA, with focus on improved alignment of federal programs to strengthen the capacity of state workforce systems to meet emerging employers' needs with appropriately skilled and credentialed individuals. Project CASE provides a solid strategy for providing individuals with disabilities who face barriers to employment with workforce investment activities, education and supportive services to enter and retain employment.

Career Pathways initiatives in Kentucky over the past decade have created partnerships between industry and education at the secondary and post-secondary levels, and forged important links to strengthen local economies. Project CASE will help ensure that individuals with disabilities, even at the secondary school level, are not left out of participating in these existing initiatives and can prepare for and obtain jobs in high-wage, high-demand occupations.

By maintaining a focus on family-sustaining wages and jobs in high growth occupational sectors, the KCC will promote program activities across agencies that create a greater collective impact.

Sector Strategies

In 2016 the Commonwealth updated its targeted sectors and began to address the skill gaps in those sectors through the sector strategies initiative. The list of industries was compiled from a review of economic and workforce data. Additionally, an assessment was conducted which also began tying recognized industry credentials to the supply of jobs in demand. The following targeted sectors were approved as priority growth areas by the Kentucky Workforce Innovation Board:

- Advanced Manufacturing
- Transportation, Distribution and Logistics
- Business Services and Information Technology
- Healthcare
- Construction

Since that time, Kentucky has continued to shift its initiatives and strategies toward aligning demand industry sectors with secondary, post-secondary and earn and learn educational opportunities. There has been a significantly gained industry sector strategy focus in Kentucky and more than ever, we are more concentrated on an industry led service delivery level both in workforce and educational delivery.

WIOA staff and our partners have become more familiar with their regional target sectors and with how target industry sectors inform training decisions and service delivery. In the next five years, Kentucky will continue embedding an industry led and employer engaged focus into all levels of service delivery, communications, training, and the potential organizational changes. It is our intent that we consistently add value and impact for both employer and individual customers.

The Kentucky Workforce Innovation Board's newly created WorkReady Strategic Plan now embeds four core goals into all work that we take on as a system.

1. Engaging Employers at an Increased and Fast Paced Rate
2. Improving education outcomes in the Commonwealth
3. Increasing Workforce Participation
4. Aligning Resources and Eliminating Silos

Through the Work Ready Strategic Plan, the Commonwealth, through a variety of partnerships with the Education and Workforce Cabinet, Cabinet for Economic Development, the Kentucky Council on Proprietary Education, the Kentucky Department of Education inclusive of Career and Technical Education, the Kentucky Community and Technical College System, the Kentucky Labor Cabinet, and the Kentucky Chamber of Commerce has set forth objectives and mesaurables as related to the above mentioned four objectives. It is the Commonwealth's intent to align all collaborative work, strategies and efforts with the WorkReady strategic plan and begin to advance partnerships to a new level of accountability, transparency and effectiveness.

To read more about the strategic plan, go to http://kwib.ky.gov/strategicplan/StrategicPlan_021518.pdf.

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).

Kentucky has a major new initiative underway that is accelerating the alignment and integration of core programs, partners and other resources: Kentucky Health Community Engagement, called "PATH" or "Partners to Advance Training and Health". The Commonwealth's recently approved Medicaid 1115 Waiver includes a requirement that certain participants meet a 'community engagement' requirement in order to maintain Medicaid eligibility. Community engagement is defined as work, community service or job training or education, and because the requirement so closely mirrors the expertise and offerings of the WIOA core programs and partners Kentucky has chosen to award the services provided to the local workforce boards via contracts with the state. These new contracts and resulting services will begin operating in a pilot workforce development area on July 1, 2018 and in additional workforce areas month by month throughout the remainder of 2018. The services will be supported by an integrated new case management system called KEE Suite, built upon a Sales Force platform. Thus, the PATH program as designed by the Commonwealth, approved by the Center for Medicare and Medicaid Services and delivered in a unique collaboration among Kentucky Cabinets (Education and Workforce Development and Health and Family Services) and local partners (workforce boards, their contractors, and local nonprofits who provide a variety of resource and services to common populations) will spark true integration of services, innovation and will enable Kentucky to address key weaknesses identified when the previous State Plan was submitted, including aging technology and uneven resources across the Commonwealth. Additional weaknesses identified in this plan update — performance data quality, overall level of performance, and

the need to provide significant training and development to career center staff, are the critical priorities of Kentucky workforce leadership during the time remaining under this plan.

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 Kentucky Workforce Innovation Board (KWIB) serves as an overall policy and advisory board to the Governor specifically charged with creating a plan for a statewide vision to connect education, workforce and economic development initiatives under the auspices of the federal Workforce Innovation and Opportunity Act of 2014. The most crucial element for the Board's success is aligning the many facets of workforce development — business, labor, public education, higher education, economic development, youth activities and employment and training to cohesively create a system for Kentucky to progressively grow its economy.

Gov. Matt Bevin is currently being advised by the KWIB, which was created by Executive Order in July 2015. The KWIB was created by the previous governor and continues to move forward under Bevin's direction. Specifically, the KWIB is being advised by an executive committee and several standing committees.

The executive committee provides and discusses overall direction to the KWIB. Standing committees will be enacted related to:

- performance and metrics,
- policy and operations,
- best practices review, and
- business and education partnerships.

Each committee meets between quarterly KWIB meetings to update the WorkSmart Kentucky strategic plan so that it continues to align with this state plan. The new administration and the new KWIB are working to manage and update the plan and planning process.

The KWIB will be convening several stakeholder groups to address the following:

- talent supply/demand,
- performance of the overall workforce delivery system, and
- best approaches to address economic growth for Kentucky.

The information gained in those sessions will assist in advisement for updating the current strategic plan.

Last fall, the KWIB began providing policy and technical assistance to local areas as related to WIOA implementation. Currently, KWIB is providing regional assistance and will be growing into a full implementation mode with the revision of the WorkSmart Kentucky plan in March 2016.

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.

WIOA emphasizes the alignment and integration of services through core partners that include the adult, dislocated worker and youth programs; Wagner-Peyser; Adult Education; and Vocational Rehabilitation. The Kentucky workforce system fully aligns programs strategically via its organizational structure (Titles I, III and IV in same Department, Kentucky Workforce Innovation Board (KWIB) participation and Cabinet-level discussions and project development, as well as in the Kentucky Career Center system in the seamless provision of services to business customers and job seekers. KWIB and core partners will work together to develop policies and coordinate the delivery of services outlined in this Combined Plan.

System Administration Alignment A critical component of this alignment effort is the partnership between the local workforce development boards and the state agencies (Office of Vocational Rehabilitation, Office of Employment and Training and Kentucky Adult Education (KYAE)). This partnership has been the foundation of the existing certification and impact efforts described below. Focusing on shared staff training, regional planning and new initiatives, as identified by the new administration, will allow this partnership to continue to expand and benefit employer and individual customers and the quality of the services they receive. All the core partners played a role in the work of the WorkSmart Plan initiatives and were a part of the Combined Plan workgroup. The Kentucky Department of Workforce Investment held a WIOA State Plan partner round table at the Kentucky Chamber of Commerce. Employers and partners from Adult Education, Economic Development, Vocational Rehabilitation, the Kentucky Workforce Investment Board, the Kentucky Department of Education and local workforce development areas participated. There were several prevalent themes that emerged from the round table discussion. As WIOA and other workforce policy and programs are developed over the next four years, core and additional partners will share information and planning tasks to ensure effective and aligned results. On a local level in the ten workforce areas there are established work teams and committees consisting of representation of all the core partners working to align the core programs through local efforts. Locally, the core partners along with optional partners work together to establish resource sharing agreements for each area. Additionally, in the development of memorandums of understanding work teams with representation from each partner come to agreements that further clarify roles, responsibilities and decision-making processes in the Career Center offices. Kentucky is working on co-location of the core partners in office locations across the state. The Kentucky Career Center Certification effort was a core WorkSmart Kentucky strategy and has gained a good deal of traction. Each local workforce area has at least one certified full-service center. Centers at varying points along the certification continuum report a number of positive results from the process, including enhanced partner collaboration, more functionally aligned center staff and services and better coordinated center management and operations. Kentucky will meet WIOA's certification requirements using this previously developed model. Another alignment strategy that has already begun and will be expanded over the next four years is the Team Based Case Management (TBCM) initiative. The purpose of the TBCM initiative is to set standards for establishing a system of collaborative case management among KCC partners. TBCM builds on the functional alignment within the centers and focuses on providing services to job seekers in a consistent, coordinated and efficient way. The systems and tools used in the TBCM approach reinforce functional alignment and integrated service delivery within the centers and

among partner agencies. To strengthen this project, Kentucky's consultant coordinated activities in recognition of and alignment with other key actions in the WorkSmart Kentucky Strategic Plan including Kentucky Career Center Customer Flow, Kentucky Career Center Certification, Partner for Success and Workforce Academy. Services to Employers are aligned among the core partners through the Business Services teams of the Kentucky Skills Network. Since the implementation of the WorkSmart Kentucky Strategic Plan, a priority has been developing unified and collaborative approach to service delivery in our business services model. It is critical that all the government agencies working to meet the employment needs of business and industry work together taking a solutions-based approach to meeting their needs. This is being done through regional Business Services Teams. WIOA Performance Outcomes Measures Group is a work group made up of the core partners to develop cross-program common measures and address all issues and concerns regarding data collection and reporting. The group is facilitated by the Kentucky Center for Workforce Statistics (KCEWS). The Partner for Success initiative brought together all agencies in the Department of Workforce Investment to develop a unified approach to delivering services. The goal was to create networking opportunities, create awareness of the services each partnering agency delivers and assemble the full array of services delivered to customers in a manner that is efficient, effective and holistic. A top priority of the current Governor's Discretionary Budget is to advance the work of training of state staff and partners. The new effort will build on previous Workforce Academy curriculum that provided training for all partners at every level of the system. Training has been and will continue to be held regionally inclusive of local level staff covering topics such as WIOA implementation, customer flow, local labor market information, transformational leadership and system transformation.

Workforce System Planning, Training and Development

Alignment among program and partners is an outcome of a comprehensive approach to WIOA service delivery and implementation, as shown above. Service Delivery among Core Partners Each of the 10 local areas must have at least one comprehensive KCC office that provides physical access to core services: WIOA Title I (adults, dislocated worker and youth formula programs), WIOA Title II — Adult Education (AEFLA program), WIOA Title III — Wagner-Peyser Act employment services and WIOA Title IV — Vocational Rehabilitation Program and other required partners. KCC has established reciprocal referral services which allow for more efficient services to individuals with disabilities. OVR has implemented an information and referral system to ensure that individuals with disabilities will be provided accurate vocational rehabilitation information and guidance using appropriate modes of communication, to assist in preparing for securing, retaining or regaining employment. The office assures the referral of these individuals to other appropriate Federal and State programs if it is unable to serve them. Kentucky Adult Education provides information to local programs to assist students with barriers to employment to access the services for which they are eligible. Through Project CASE, a program developed from the use of Federal grant funding through the Rehabilitation Services Administration, the vocational rehabilitation offices of

OVR will have stronger coordination and collaboration with the Youth Career Center offices and other Kentucky Career Center offices in the EKCEP and KentuckianaWorks regions. Adult Education is an active partner in CASE providing supports through the AOKY program. Accelerating Opportunity is aimed at creating effective pathways to credentials for low-skilled adults (testing at a sixth-12th academic grade level) so they can earn the credentials they need to get a family sustaining job. The initiative seeks to reform how education is delivered to low-skilled adults by integrating basic skills education with technical training while providing wrap around services that include instructional and career supports for adult learners. The initiative is informed by I-BEST, an accelerated, integrated instructional model in which adult education and technical instructors work together in the classroom. Career and Technical Education is closely aligned with the project as well. Kentucky will use funds to ensure that all youth program elements are made available to youth. The state supports the local workforce areas in designing youth programs tailored to the needs of in-school and out-of-school youth in local communities. Local areas encourage youth to use one-stop services as needed. Areas have designed special referral processes for youth who come into one-stops and one area has developed a one-stop career center specifically for youth. Vocational

Rehabilitation staff will provide high quality services and communication to transition students and youth, provide accurate and timely information related to work incentives and long-term supports for Social Security recipients, increase and improve job placement options and opportunities for persons served, strengthen and expand competitive integrated employment opportunities by implementing Section 511 of WIOA, improve programmatic and physical accessibility to workforce investment system partners and career center offices, communicate and cooperate with workforce partners on accountability measures discussed in Section 116 of WIOA and seek to meet the standards of WIOA, expand opportunities for increased services, such as supported employment, provide options for transportation and information related to medical services available to consumers, and provide a more timely and efficient process for accessing services. All partners will participate in training on all youth-related programs and services to ensure that cross-referral and comprehensive services are delivered to youth across the state. Kentucky is currently testing a common intake and service delivery approach based on a Sales Force platform. The initial test will focus on one particular grant and several local career center offices. Additional building blocks that enable this system to serve as an integrated case management system across the majority of core partners and to exchange data with Adult Education will be added as priorities are determined and funding becomes available. Kentucky implemented a WIOA Title I Adult and Dislocated Worker - Wagner Peyser co-enrollment policy and service delivery approach on July 1, 2015, thus ensuring that services to career center customers are comprehensive and holistic. Additional policy development, training and data analysis will occur during this plan period to ensure that the co-enrollment approach benefits customers and that partners are playing appropriate roles and engaged in effective process.

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.

Two major new developments have occurred since the initial submission of the state plan that have changed Kentucky's approach to alignment. The first is the fact that the ten local workforce boards now have contracted with one-stop operators in their workforce development areas. While the role of the operator is still being defined and is evolving somewhat differently in different areas, the arrival of the operators into the mix means that there is now an entity in each area responsible for alignment of programs and activities within each area. In the coming few years, Kentucky plans to leverage these operators and the information and resources they can bring to the table as another source of encouragement for the alignment that needs to occur across all areas and the Commonwealth as a whole. The second development, as noted elsewhere in this plan, is the approval and early implementation of the Kentucky HEALTH community engagement model. Kentucky HEALTH is requiring alignment between human services, workforce, adult education, and health partners at a never-before-seen level of design partnership, staff training, and customer service delivery. As the model is implemented during the last half of 2018, additional alignment activities will occur and will spark new approaches and adjustments within the delivery of workforce services. Kentucky is continuing to establish and leverage close partnerships with the Labor Cabinet to expand registered apprenticeships and has recently expanded its partnership with the Justice Cabinet to begin offering re-entry services both pre- and post-release at Correctional facilities.

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.

The Customer Flow initiative focuses on both individual job seeker and employer customers. The Customer Flow effort is a critical component to ensuring the KCC system's ability to deliver on the following brand promise:

As a team of experts, we are dedicated to providing Kentucky employers with a qualified, skilled workforce and the people of Kentucky with career, job training and educational opportunities. With the unique ability to connect employees and employers through the combined efforts of state and local partners, we will become a valuable, competitive and best—in—class asset in the growth of our regional and national economy. By guiding, empowering and inspiring our customers, we will continue our mission to create success stories across the Commonwealth.

Kentucky's statewide goal, through the Customer Flow project, is to improve customer flow through the centers and to enhance the value received by customers from their experience with the centers. Kentucky will continue its work in this area to facilitate customer flow enhancements and improve customer experiences/value through clear and direct policy guidance and performance expectations that address identified themes from this project. Career Center Customer Flow and service delivery issues thematic areas are:

- enhancing industry sector focus and business services;
- re—orienting KCC focus and developing staff; and
- organizing and integrating services and needs for more service diversity.

Kentucky plans to further support this initiative in the upcoming year with the provision of technical assistance funds to the 10 workforce areas in addressing the findings and recommendations identified through this initiative.

The career center offices engage and leverage all system partners for customers. Kentucky continues to set knowledge and competency expectations related to WIOA so that all core career center staff, regardless of program or agency affiliation can provide information regarding supportive services for individuals identified in section II (a) (1) (B). The career center partners have established reciprocal referral services which allow for more efficient services to be provided to individuals with barriers to employment.

D. COORDINATION, ALIGNMENT AND PROVISION OF SERVICES TO EMPLOYERS

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

The KSN is a partnership of local and state workforce development organizations dedicated to providing proactive business services and industry skills development. Through local Business Service Teams, the KSN has laid a foundation for coordinated employer services that will be leveraged in the coming four years.

The KSN offers a streamlined approach to assisting companies with recruiting talent, training new and existing employees, and developing tomorrow's workforce. Consisting of four primary entities from the Kentucky Cabinet for Economic Development, Kentucky Education and Workforce Development Cabinet (i.e. OVR, OET), Kentucky Labor Cabinet, and the KCTCS, the KSN exists to provide unified, efficient, quality

and seamless workforce services and resources to new, existing and expanding companies within the Commonwealth.

The mission of the KSN has the following four primary components:

- single point of contact approach,
- streamlined workforce resources,
- unified marketing and information and
- talent/workforce development pipeline.

KSN local business service teams are designed to provide a primary point of contact for employer customers. The partner with the best/most established relationship with an employer should maintain responsibility and communication with the customer and engage other partners in order to provide streamlined solutions—based business services plans. The structure of the KSN business services teams is comprised of three levels, each of which may act as a point of entry for contact with companies. Level one consists of the state team and includes one representative from each of the four core partners. These individuals synergize to ensure that companies receive unified and coordinated information and services related to their workforce development needs. Level two includes the Business Services Team leads (BST), as identified by their Local Workforce Development Board (LWDB). These BST leads are individuals who are dedicated to business services as a primary function of their job. Typically, BST leads represent the LWDB. Through the Kentucky Career Center Certification initiative, workforce system partners now have a consistent organization model for business services. BST leads are KCC system partner personnel responsible for forming relationships with companies in their local areas and performing business services. Level three includes all local representatives from the Cabinet for Economic Development, KCTCS Work—force Solutions and the KCC.

The KSN brings together workforce and economic development programs and resources, thus providing a variety of ways to build workforce skills and ease training costs for employers. Through such options as reimbursable grants and tax credits for classroom training, on—the—job training, tuition and certification training, train—the—trainer travel, and entry—level and skills—upgrade training, Kentucky has resources that allow flexible and customizable training specific to company needs.

Early in 2016, KSN partners will gain access to a customer relationship management system based on a sales force platform. Phase one will allow shared access to employer contact and needs, and Phase two later in 2016—17 will give KSN partners the ability to add and assess employer programs and resources via the Sales Force application.

In addition to leveraging and expanding the KSN effort, Kentucky expects a great deal of new activity assessing and addressing employer needs via existing partnerships with business organizations like the Kentucky Chamber of Commerce, and most importantly, through new strategies and initiatives crafted by the new administration.

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).

Engagement of Kentucky's education partners has been continuous under the project agenda of the former KWIB's WorkSmart Kentucky plan, and is accelerating under the pillars of the NGA Talent Pipeline Academy agenda, with both KCTCS and the CTE unit of KDE serving as core partners in that effort. The priority focus of all workforce partners is on building a work—based learning infrastructure that is

employer—defined and seamlessly delivered by an interlocking series of steps that begin early in the education pipeline and continue through careers and lifelong learning.

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.

Kentucky will continue to strengthen data sharing across state agencies and workforce development partners, including all levels of education and proprietary providers to better understand education and employment outcomes and to support the spread of employer best practices.

To create a diversified and comprehensive base of education and training providers, OET leadership has been intentional in the creation of partnerships across the spectrum of training providers. This is evident in both policy and practice from the formation of the Eligible Training Provider Listing (ETPL) Steering Committee to ongoing participation in statewide discussions centering on the importance of creating job—driven services.

From the perspective of training providers, staff members went to great lengths to ensure that representation from a host of industries and training providers were included, and perspectives were gathered. ETPL staff has partnered with many state agencies and groups to make sure that all were represented and that everyone understood the process. Represented agencies include:

- Kentucky Department of Education, Office of Career and Technical Education
- Kentucky Council on Postsecondary Education
- Kentucky Commission on Proprietary Education
- Association of Independent Kentucky Colleges and Universities
- Kentucky Department of Labor, Division of Employment Standards (Apprenticeship Programs)
- Kentucky Adult Education

Representatives from these agencies, as well as independent training providers, also make up the ETPL Steering Committee, which is a sub—function of KWIB. This group assists with making sure the listing is comprehensive of services available to prospective participants, as well as accessible to all.

Most recently, the ETPL coordinator was asked to serve on the KWIB Business and Education Alignment Committee. This group will assist with identifying and implementing comprehensive strategies to align education with industry needs, thus fulfilling the supply and demand of the state's job market.

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).

Given the skill development needs voiced by employers and in evidence with many job seekers, enhancing community and technical college partnerships to increase training and development options for KCC customers appears to be a significant need. This will be an area of focus to strengthen and sustain partnerships with community and technical colleges to expand “bridge” and post—secondary and training and education options for job seekers, and to expand market—driven training programs for employers. Kentucky will build on the initial success of the Accelerating Opportunity/GED credential initiative and will take additional steps to more fully engage KCTCS and the CTE programs of local districts and the KDE.

KDE supports the development of career pathways through the Carl D. Perkins State Plan. Local CTE programs are required to have an advisory committee that guides the curriculum and industry certifications for students. This network allows secondary and post—secondary institutions to create rigorous pathways that incorporate work—based learning and accelerated opportunities like dual—credit.

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.

In most areas of Kentucky, training investments have been quite explicitly linked to target industry sectors and high—demand occupations. In many cases, these investments are individual training accounts (ITAs). An area of focus for the Career Centers will be to expand their use of alternate training modalities, specifically employer—driven and work—based models, that might be shorter—term, more modular in nature, and more explicitly tied to the attainment of “stackable” credentials. Certainly, registered apprenticeships, on—the—job training, and customized training are all approaches that could be targeted for increased use and expansion, perhaps in partnership with KCTCS and others.

Kentucky Department of Education (KDE)

KDE requires all secondary CTE programs to report on career pathway opportunities for students. The career pathway process encourages dual—credit courses along with industry certifications and credentialing. KDE works closely with state—level CTE task force groups composed of KWIB representation and business and industry to review industry certification requirements for high school students. The certifications/credentials are then endorsed by the KWIB. This ensures the certificates and/or credentials will lead to employment and/or post—secondary credit. Kentucky also created the Tech Ready Careers for Kentucky (TRACK) pre—apprenticeship program. Kentucky is the only state in the nation that has a state—wide agreement for registered apprenticeship opportunities that begin in high school. The areas include carpentry, electricity and manufacturing. The models vary based on the need of industry but lead to credentialing, apprenticeship credit, and/or post—secondary credit at an accredited institution while students are in high school.

Kentucky Adult Education

KYAE is strategically positioned to create significant post—secondary education linkages. These linkages are important in recruiting students and helping them transition to post—secondary education, as well as to assist with planning and providing professional training and development for adult educators. The usual and customary services of KYAE, which services in all 120 counties, include addressing academic deficiencies and equipping students for success in the next level of college and/or achievement via preparation for college, the National Career Readiness Certificate and the Kentucky Essential Skills Certificate.

Accelerating Opportunity Kentucky (AOKY)

Together with its partners, Department for Workforce Investment and KCTCS, KYAE created and vetted a modified accelerating opportunity framework. The program is designed to accelerate adult education by concurrently enrolling eligible students in post—secondary education and adult education, while integrating foundational academic and technical skills. Unique and recognized—as—effective characteristics of the model include: the working relationship between adult educators and technical faculty, comprehensive and intensive wraparound services that ensure students’ successful navigation of systems, the renewed focus of improving students’ opportunities to participate in work—based activities, and access to job placement services. Additionally, there has been a renewed effort to ensure employers are

engaged upfront to reinforce what jobs are in demand and what skills are necessary for the job, supporting more work—related activities, and enhancing the potential for job placement.

Workforce Preparation As a result of the extended pilot for Essential Skills, nearly one—third of the state’s local adult education programs received coaching and training on integrating essential employability skills with academic instruction. KYAE dedicated multiple resources to support this training, including CTE’s Perkins leadership grant funds. Consequently, within an individualized program of study, every student has multiple opportunities to practice and perfect the essential skills (often referred to as soft skills, e.g., collaboration, communication and critical thinking) employers seek. At the end of the program year, through the use of WIA Incentive Funds, KYAE and the Department of Workforce Investment renewed their contract for Worldwide Interactive Network’s (WIN) online curricula course ware that now provides not only WorkKeys/National Career Readiness Certificate (NCRC) preparation, but soft skills and College and Career Ready System—based curricula tracks. Along with the administration of badge—supported curricula and assessments, the essential skills track concludes with a Kentucky Essential Skills Certificate (KESC). (See also Adult Basic Education and Literacy Programs, Workforce Preparation.) KYAE is represented on several boards and committees, and plays an active role in several initiatives in the Commonwealth. The **Executive Director** of KYAE is an active proxy member of the KWIB participating in quarterly KWIB meetings and commits to initiatives, such as the accelerated learning program GED Express, to collaboratively advance workforce education and skill development in the Commonwealth. A KYAE staff member serves on the Work Ready Communities Steering Committee, promoting adult education programs’ participation in the local application to achieve Work Ready Communities certification by: decreasing the population without a high school diploma or its equivalent; increasing NCRC awards; and contextualizing academic skills with employability skills (beginning with pilot programs and an expedited roll—out in 2014—15 to Work Ready Communities In Progress as a priority). KYAE programs prepare students to take the ACT WorkKeys assessment to earn the NCRC, a standardized credential that validates reading, mathematics and locating information skills for specific occupations. KYAE programs use WIN’s online curriculum aligned with the WorkKeys assessment within an academic program of study and defrays the cost of the certificate for adult education students. KYAE includes the NCRC as a performance target and will continue to focus on it as a stack—able credential throughout the students’ educational journey. KYAE is supportive of the KCC system vision and collaborates with KCC offices across the Commonwealth (e.g., co—location, common intake and referral processes, etc.). The KSN is a unique partnership between the Cabinet for Economic Development, Education and Workforce Development Cabinet including KCC, the Labor Cabinet and KCTCS. The network is dedicated to assessing employer skills needs and designing and delivering effective workforce solutions. Local KYAE programs are available to provide services in cases where potential or current employees are eligible for adult education. KYAE’s **Executive Director** is also a proxy board member of the BSSC, which was established in 1984 by the Kentucky General Assembly as an independent, de jure corporation to stimulate economic development through programs of skills training to meet the needs of business and industry. KYAE partners with the Department of Corrections to serve both full—service jails’ correctional offenders and state adult institution inmates. Adult educators provide educational services to jails based on cooperative agreements with jailers. KCTCS faculty is commissioned to serve state adult correction—al institution populations; however, adult educators support those educational experiences, offering evening classes for offenders.

KYAE’s **Executive Director** and the Kentucky Department for Library and Archives’ (KDLA) commissioner distributed a memorandum encouraging local adult education and public libraries to strategically partner in their attempts to reach our target population in alternate venues. KYAE also coordinated with KDLA during a pilot program to explore best practices of forging these partnerships and promoting use of Kentucky Educational Television’s (KET) Fast Forward online GED test preparation.

Additionally, KYAE partnered with the Kentucky Virtual Library (KYVL) and KCTCS to contract with the National Resources Open College and Career project to offer customized tracks of Network Resources Open College and Career’s (NROC) EdReady, including GED testing, Kentucky Online Testing (KYOTE), and

other college—ready placement testing. KYAE will conduct a pilot project, including evaluation, to determine best practices involving occupational training partners beyond its work with KCTCS, e.g., employers, healthcare associations, and emergency medical technicians. (See also Adult Basic Education and Literacy, Integrated Education and Training.) This will also entail assembling a work group to coordinate and align occupational training resources to be used throughout all career pathways endeavors.

Integrated English Literacy and Citizenship (IEL/C) grants awarded during the fiscal 2015—16 program year included a work—related goal. KYAE wanted programs that typically serve students with these grants to begin formulating ways to transition them into Adult Basic Education (ABE) with the goal that other ABE students have of entering post—secondary education and/or a career pathway, thereby integrating English Literacy and Citizenship education with moving toward self—sufficiency.

English Literacy and Civics (EL/C) programs in Kentucky continue to use a variety of activities and instructional methods to enhance non—English speaking student’s effective communication skills and civic practices. Additionally, programs sponsor cultural activities, such as holiday and international celebrations during which students are invited to bring indigenous food and share their own cultural traditions. These efforts help non—native English speakers navigate and participate in their children’s educational experiences, access services and participate in community activities.

KYAE is also working with WIOA partners to implement TBCM to set standards for establishing a system of collaborative case management among career center partners. The systems and tools used in the TBCM approach reinforce functional alignment and integrated service delivery within the centers and among partners.

KYAE is also directly involved with two Supplemental Nutrition Assistance Program (SNAP) grant initiatives with Department for Community—Based Services (DCBS). Paths to Promise (P2P) is a pilot program with a robust research component serving eight counties in Eastern Kentucky. The pilot includes moving eligible students into AOKY career pathways. The subsequent allocation of employment and training funds will be dedicated to providing support services to students pursuing education and training in urban areas across the state.

Project CASE is a collaborative effort between state vocational rehabilitation agencies, adult education, secondary and post—secondary education, career centers, employers and other partners to demonstrate how career pathways can help individuals with disabilities acquire the marketable skills and attain recognized credentials that lead to employment in high—demand occupations. In Kentucky, two pilot projects are planned in the Metro Louisville and Eastern Kentucky Concentrated Employment Program (EKCEP) regions; these will engage seven and 23 counties respectively.

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.

Coordination between the workforce and economic development entities, both state and local, is strong. That coordination is supported by the two major initiatives described throughout this plan. The NGA Policy Academy on Aligning the Education and Training Pipeline to the Needs of the Economy and Kentucky Skills Network provide strategic (NGA) and structural (KSN) basis for meaningful coordination and shared vision and activities.

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.).

Existing legacy case management systems across OET and OVR are disparate and insular. At the core of Kentucky's current efforts to achieve inclusive and comprehensive interoperability are the following plans:

- Reciprocal exchange of distinct data between the common intake system and the legacy transactional systems currently utilized in each agency.
- Conversion to a cross—agency, common case—management system will be executed as current legacy transactional systems are retired. The system will be built using the same technology deployed for the common intake process.

This long—range plan solidifies an enduring and inclusive virtual management system through consolidated customer service. The process for accessing and availing services for all customers including individuals, employers, claimants and training providers, will be facilitated and coordinated via a single point of entry to the system.

New data—linkages will greatly enhance Kentucky's ability to make real—time and insightful economic, educational and social policy decisions. By eliminating current delays associated with the time required to request, gather and dissect often divergent data sets, agencies will be better equipped to measure the effectiveness of their programs, targeting programmatic and administrative areas for improvement. More importantly, the system will enable the creation of effective and broad reaching customer awareness and utilization of agencies' broad array of available services. The common data repository built upon the same technology used for the intake and case management processes is integral to this plan to ensure standardization and integrity of mandated state and federal reporting requirements.

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

In 2018, Kentucky implemented local performance metrics to the local areas as a way measure “real time” performance. These measures restructured the way in which services were previously provided as they placed a heavier emphasis on employment services rather than unemployment services. Customers who enter the career centers are provided a Welcome, Orientation and Assessment. They meet with a career coach to assist with referrals and job placement services. Unemployment questions are now handled via the call center.

Existing legacy case management systems across WIOA Title I, Wagner Peyser, Vocational Rehabilitation and Adult Education are disparate and insular: Currently, the Office of Employment and Training (OET) and the Office of Vocational Rehabilitation (OVR) are supported by insular case management systems that respond to requests for the following programs: • Wagner Peyser Labor Exchange (Employ Kentucky Operating System - EKOS) • Unemployment Insurance — both benefits and tax/collections (Mainframe and Kentucky's Electronic Workplace for Employment Services — KEWES) • Veterans Program • Migrant and Seasonal Farm Workers Program • National Emergency Grants • High Growth Job Training • Foreign Labor Certification • Health Care Tax Credit System • Trade Adjustment Act • Work Opportunities Tax Credit • Workforce Innovation and Opportunity Act of 2014 (WIOA) • Student data • Customer records, services

provided and costs of services for individuals with disabilities and blindness — Case Management System — CMS • Social Security Reimbursement tracking and processing • Social Security Ticket to Work assignment tracking and processing

The agencies share many customers. However, agency case management systems have a number of constraints prohibiting data sharing among the sister agencies, as well as with employers, job seekers and training providers. The following information provides high-level overviews of each system:

EKOS Kentucky is a member of a multi-state consortium, America's One-Stop Operating System (AOSOS), which supports a web-based system for its Workforce Investment Act of 1998 data collection and reporting, Wagner Peyser employment services case management, Trade Adjustment Act and overall reporting activities. Kentucky's system is called the Employ Kentucky Operating System (EKOS), which can also generate ad hoc reports built using Enterprise Business Intelligence and Crystal Report. In July 2016, Kentucky ceased WIA data collection and reporting, and begin working to implement WIOA data collection and reporting. There is also a telephonic component within EKOS known as Outbound. Outbound allows claimants and employers to receive telephonic notification regarding job fairs, job vacancies and job postings, among other services.

Focus Suites EKOS is complemented by and integrated with Burning Glass Technologies' Focus Suite products: Focus Talent, Focus Career, Focus Assist and Focus Explorer. Focus Talent puts employee recruitment and account management in the hands of employers. Burning Glass Technologies' patented artificial intelligence powers the search and job-match engine using a combination of candidate workplace and transferrable skills and education. Focus Career helps the job seeker (Wagner Peyser, Title I, Title IV and UI customers) to build or enhance a resume, then analyze that resume to identify pertinent open job orders so the job seeker can set up automatic email alerts when a job match is made. Both Focus Talent and Focus Career are self-service systems. However, there is a staff assist module. Focus Assist helps OET staff members support employers and job seekers through internal dashboards and menus should those users desire additional assistance. Finally, Focus Explorer, another self-service medium, is a career counseling tool for job seekers to discover in-demand jobs, skill requirements, certifications and education coursework. It is critical to understand the integration of EKOS and the Focus Suite system. They share information regarding job seekers, job search, job matching, job posting as well as receive/share external job postings from America's Job Exchange (AJE)/Job Central and spidered jobs from Burning Glass feeds. Also important to note is that unemployment insurance claimants who are required to perform work searches must create an EKOS account and enter a resume in Focus Career or risk losing benefit eligibility.

Labor/Insight Labor/Insight is another Burning Glass Technologies application used by OET staff. Labor/Insight enables real-time access to a comprehensive database that can track employer hiring by industry, occupation, education and skills, at a national, state or regional level. It can also quantify market demand for specific job qualifications. Labor/Insight is hosted by Burning Glass Technologies.

CMS The Case Management System (CMS) supports consumer case management activities, authorizes related payment transactions, generates reports/report information and contains a Social Security Reimbursement subsystem for all Title IV consumers, for OVR. Consumer information, including confidential medical information, is collected to open a case within the respective agency. Agency services are based on the signed Individualized Plan for Employment between consumer and agency counselor. The system can attach scanned case documents, record staff provided services, staff activities, track comparable benefits, track consumer education and training advancements. There is a Social Security Reimbursement module within CMS that enables each respective agency to seek reimbursement for the cost of the services provided to agency consumers receiving Social Security Disability Insurance (SSDI) benefits or Supplemental Security Income (SSI) payments. There is a Maximus module that generates files that are submitted to Social Security for the Ticket to Work program and tracks responses and ticket assignments. In July 2016, Kentucky ceased WIA data collection and reporting and began working to implement WIOA data collection and reporting requirements in addition to other USDOE and state reporting. CMS is a staff

only application with a web front end. An interface exists between CMS and eMARS, the state's payment system, to enable processing of payments to, and refunds from, vendors. The system is Section 508 and Bobby compliant and staff use screen readers such as JAWS, ZoomText and WindowEyes, as well as speech recognition software such as Dragon Naturally Speaking.

Kentucky Adult Education Reporting System: The Kentucky Adult Education Reporting System (KAERS) is a nationally-recognized student management system designed and maintained through Kentucky Adult Education and the Education and Workforce Development Cabinet. It is used by all Title II adult education programs to record programmatic, student and fiscal agent information with a student portal for students to view their data and online curriculum. KAERS also has a reporting tool used to enhance program performance, a real-time student tracking function, and integrates external data sources. Data from KAERS is submitted, on a regular basis, to the Office of Career, Technical, and Adult Education (OCTAE) and KCEWS.

Comprehensive Workforce Development System The Department for Workforce Investment has begun planning for a future comprehensive workforce development system to provide continuous evaluation by multiple agencies to facilitate and coordinate comprehensive, efficient and effective service delivery required to meet individual client needs. Kentucky took the first step toward this vision in August 2016 when it issued a Request for Information (RFI) to determine the availability of integrated technology solutions with the following characteristics: Characteristics: • Common intake • Continuous client evaluation and assessment • Common case management of workforce services (i.e. UI, employment, vocational and blind services) • Reporting (Federally mandated, ad-hoc and analytical) • Review and Issuance of UI benefits

Kentucky is also considering options to join a UI systems consortium in the near future. At the core of Kentucky's current efforts to achieve inclusive and comprehensive interoperability are the following plans:

- Reciprocal exchange of distinct data between the common intake system and the legacy transactional systems currently utilized in each agency.
- Conversion to a cross-agency, common case-management system will be executed as current legacy transactional systems are retired. The system will be built using the same technology deployed for the common intake process. This long-range plan solidifies an enduring and inclusive virtual management system through consolidated customer service. The process for accessing and availing services for all customers including individuals, employers, claimants and training providers, will be facilitated and coordinated via a single point of entry to the system. New data-linkages will greatly enhance Kentucky's ability to make real-time and insightful economic, educational and social policy decisions. By eliminating current delays associated with the time required to request, gather and dissect often divergent data sets, agencies will be better equipped to measure the effectiveness of their programs, targeting programmatic and administrative areas for improvement. More importantly, the system will enable the creation of effective and broad reaching customer awareness and utilization of agencies' broad array of available services. The common data repository built upon the same technology used for the intake and case management processes is integral to this plan to ensure standardization and integrity of mandated state and federal reporting requirements. KCEWS collects accurate education and workforce data in the Kentucky Longitudinal Data System (KLDS) linking the data and generating timely reports about student performance through employment to guide decision makers in improving Kentucky's education system and training programs (KRS 151B.132, 2). KCEWS currently collects data from key state agencies, such as KYAE, OVR and post-secondary data from public, private and proprietary providers in the longitudinal data system. (KRS 151B.132, 4). Additional transactional data collected will be added as data systems at state agencies are updated to reflect any changes required to measure the impact of education and workforce programs. Staffs at lead state agencies have access to their and other common data through KCEWS' Web Intelligence Business Objects Platform (WEBI). Additionally, KCEWS has the ability to facilitate conversation and set common metrics for education and workforce programs (151B.133,5).

* 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.

Kentucky is currently testing a common intake and service delivery approach based on a Sales Force platform. The initial test will focus on one particular grant and several local career centers. Additional building blocks that enable this system to serve as an integrated case management system across the majority of core partners and to exchange data with KYAE will be added as priorities are determined and funding becomes available.

Kentucky's co—enrollment policy addresses the required co—enrollment of participants under WIOA Title 1 Adult and Dislocated Worker programs and Wagner—Peyser. Beginning July 1, 2015, all adults and dislocated workers who received KCC services other than self—service and informational activities were required to be registered and considered a participant for WIOA Title I services.

The WIOA and Wagner—Peyser co—enrollment system process occurs through an automated process within EKOS, Kentucky's Management Information System, provided that the appropriate activities and verification are provided on the customer's record. Staff members ensure that the correct activities are recorded for the respective programs as well as verify that date of birth and veterans information are correctly documented in EKOS. Customers will then be co—enrolled and counted in both WIOA and Wagner—Peyser Performance Measures.

The state has established a standard for paperless WIOA Adult and Dislocated Worker and Wagner—Peyser program registration based on the definition of self—attestation and implemented through Focus Career, which is the customer registration program. Once a customer has registered in the Focus Career system, the information is shared and integrated into EKOS. If the customer is receiving services at a KCC office, staff will log into EKOS and select the date of birth/veteran verification tab in the Customer Detail module. The staff will then verify the customer's date of birth and veteran information, if applicable. Staff will also record the activity or activities that have been completed. Once this process has been completed, and an overnight batch process takes place looking at activities that have been placed on the record that would trigger a co—enrollment, the customer will be co—enrolled into both WIOA and Wagner—Peyser.

Kentucky's Memorandum of Understanding (MOU) and Resource Sharing Agreement (RSA) guidance policy was issued Dec.17, 2014 with an effective date of July 1, 2015. The interim, from issuance to implementation, allowed for a very active and engaged period of time for planning, partner engagement and technical assistance sessions. The policy directed that local workforce development boards (LWDB) develop a MOU, with the agreement of the chief elected official, and the KCC partners concerning the operation of the KCC system. The policy included a MOU template to develop the agreement along with all required attachments.

LWDAs met with partners to discuss and define the services to be provided by KCC, funding of services and operating costs, referral methods between partners, duration of the MOU and procedures for amending the MOU. The MOUs were required to include the RSA describing how funding of the infrastructure costs of KCC would be managed and details regarding the “fair share” costs of each partner. Downloadable templates and attachments were incorporated into the policy and accessible from an internal Team of Experts website. Included in the downloadable documents was a PowerPoint detailing step—by—step instructions. The final pages of the PowerPoint included the process and templates for quarterly partner budget reconciliation. The policy and documents are posted on the KWIB website — Kentucky WIOA Guidelines and Information www.kwib.ky.gov/ky_wioa.htm.

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.

In Kentucky, the workforce system is composed of employment and training programs that provide services to job seekers and employers. The Education and Workforce Development Cabinet includes the Department of Workforce Investment that is composed of OVR and OET.

OET provides support and oversight to several activities and programs authorized under Section 112(b)(8)(A). Integrating components of the Trade Act program with the WIOA dislocated worker program further enhances operational collaboration of workforce investment activities. By housing education and other training initiatives, duplication of services is reduced. A focus on re—employment services is facilitated by unemployment insurance, Wagner—Peyser and WIOA services in OET.

Kentucky has identified four regions in the state consisting of central, east, south central and the west region. Kentucky has 10 Local Workforce Investment Areas governed by local workforce investment boards. The local boards, in collaboration with Wagner—Peyser funded staff and the governor’s Workforce Investment Board, administer the state’s public workforce system. Other vital partners are the community and technical colleges that provide career and technical education and adult education. Kentucky Adult Education programs have a presence in all 120 counties.

Kentucky has built a strong foundation of partnership and collaboration among core and combined programs, local workforce development boards and employers. The WorkSmart Kentucky Plan of the previous Kentucky Workforce Investment Board, and the newly developed Economic Competitiveness Agenda, together set a tone and a set of strategies that will enable the workforce development activities of Kentucky’s system to make progress and serve individuals and employers more effectively over the next four years.

The 11 certified full—service centers and three certified affiliate Kentucky Career Center (KCC) offices provide job seekers and employers access to services. The career center offices offer a full array of employment services to help adults and dislocated workers.

The local workforce areas (LWIA) are responsible for their respective areas and oversee the operations of those programs. Kentucky is committed to ensuring that LWIAs are responsible stewards of state and federal dollars. The area workforce plans describe how services are delivered on a local level. The 10 areas are: Bluegrass, South Central, Cumberlands, Eastern Kentucky Concentrated Employment Program Inc. (EKCEP), Green River, KentucianaWorks, Lincoln Trail, Northern Kentucky and TENCO.

Each of the 10 local areas has one certified comprehensive career center office that provides physical access to core services: WIOA Title I (adults, dislocated worker and youth formula programs), WIOA Title II — Adult Education (AEFLA program), WIOA Title III — Wagner—Peyser Act employment services and WIOA Title IV — Vocational Rehabilitation Program and other required partners.

Kentucky is early only four months into a new administration and the identification of workforce priorities and initiatives. At this time, the organizational structure is in process of review. The organizational chart can be found here: kwib.ky.gov/orgchart.pdf

B. STATE BOARD

Provide a description of the State Board, including—

The Kentucky Workforce Innovation Board (KWIB) serves as an overall policy and advisory board to the Governor specifically charged with creating a plan for a statewide vision to connect education, workforce and economic development initiatives under the auspices of the federal Workforce Innovation and

Opportunity Act of 2014. The most crucial element for the Board’s success is aligning the many facets of workforce development — business, labor, public education, higher education, economic development, youth activities and employment and training to cohesively create a system for Kentucky to progressively grow its economy.

I. MEMBERSHIP ROSTER

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

CURRENT BOARD MEMBERS Governor Matt Bevin Governor Commonwealth of Kentucky

Senator Jimmy Higdon District 14 Kentucky State Senate

Representative Jim DeCesare District 21 Kentucky House of Representatives

Hugh Haydon, KWIB Chair President/CEO Kentucky Bioprocessing, Inc.

Kim Menke State Government Liaison Toyota Motor Manufacturing

Carla Webster HR Program Manager Conduent

Chris Reinersman Senior Talent Acquisition Specialist DHL

Peter Feil Vice President/General Manager Stober Drives

Heidi Margulis Senior Vice President, Corporate Affairs Humana

Adam Hinton Vice President Hinton Mills

Robert Southard Workforce Excellence Analyst Southern Star Central Gas Pipeline

Pat Murphy Workforce Development Manager United Parcel Services (UPS)

Danette Wilder President/CEO SealingLife Technologies

Torsten Langguth Plant Manager Dr. Schneider Technologies

Kevin Smith Vice President, Bourbon Affairs Beam Suntory (Jim Beam Brands)

Amy Luttrell President/CEO Goodwill Industries, Kentucky

David Boggs President/CEO Opportunity for Work and Learning

Terry Sexton Labor Union Representative Boilermakers Local 105

Scott Pierce Labor Union Representative Operating Engineers Local 181

Bernard Miles Labor Union Representative Electrical Workers Local 761

Hal Heiner Secretary Education and Workforce Development

Terry Gill Secretary Economic Development

Derrick Ramsey Secretary Labor Cabinet

Michael Buchanon Judge Executive Warren County

Thomas Watson Mayor Owensboro County

Dr. Stephen Pruitt Commissioner Department of Education

Dr. Aaron Thompson Executive Vice President Council on Post-secondary Education

II. BOARD ACTIVITIES

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

A comprehensive new member orientation occurred for all new members inclusive of their role on the board and the purpose and scope of work required of the board. An overview of the work of the previous board was highlighted.

Additionally, the executive director of the board met individually with each KWIB member to discuss specific interests, priorities and thoughts about progressing Kentucky's workforce system forward.

The board chair established an executive committee. Members were invited to participate in regional training orientations set up throughout the state which would assist in establishing relationships between the state and local board members.

A strategic planning session of the board is being planned for early spring. At this session an in—depth review of the WorkSmart Kentucky plan will occur. This will provide the framework to establish new initiatives and goals that align with the NGA vision and efforts outlined in this section. Additionally, it will reflect the new vision set forth by the new gubernatorial leadership.

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

A. ASSESSMENT OF CORE PROGRAMS

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

The Kentucky Center for Education and Workforce Statistics (KCEWS) and state agencies will work with the state board to ensure required reports for the performance accountability are completed to the best of the state's ability. An approach Kentucky is actively exploring would house all data required for these reports in the Kentucky Longitudinal Data System (KLDS). The priority is to identify and deploy a third—party, non—agency entity to receive, clean and report from multiple data sources in the short term and ultimately assist in the development of common reports when the common system is implemented.

Kentucky assesses the overall effectiveness of the workforce investment system in relation to the strategic vision and goals of the WorkSmart Kentucky and Economic Competitiveness plans, seeking integration of activities and information from all the core programs. The ultimate goal is to increase the long—term employment outcomes for individuals seeking services, especially those with barriers to employment, to improve services to employers and demonstrate continuous improvement. Kentucky will assess the effectiveness, physical and programmatic accessibility in accordance with Section 188 and the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.), and continuous improvement of the career center.

Kentucky has a certification process in place to ensure that KCC offices are ready to serve all qualified persons in the regional and local areas as expected. The certification policy is fundamental to aligning programs, policies and activities in the workforce system. Workforce agencies and partners are engaged in this assessment and continuous high—quality improvements to ensure that all related activities are being coordinated in a way that allows partners to review relevant information and take action to improve the system.

KCEWS works with all relevant state agencies to integrate data storage activities which, hitherto, were being carried out separately. This ensures that data about all persons seeking services from any of the core programs are captured and matched so as to avoid duplication of service delivery. Not only does this help track the workforce services provided, it also enables evaluation of those services — for example, the employment status of eligible training program completions several years out.

Storing all WIOA—related data in a common data warehouse will enhance data retrieval and analysis, which will help KCC to efficiently assess the quality of our workforce service providers. Kentucky will review data to track provider success in meeting the targets in the following areas:

- learning gains;
- entry into employment in required quarters;
- obtaining a secondary credential and enrollment into post—secondary or training;
- obtaining a secondary credential and gaining employment; and
- gaining a post—secondary credential.

Having all core programs' data integrated will enable service providers to conduct regular audits to determine which program service providers are challenged in meeting targets and in need of technical assistance beyond the standard leadership activities that are provided. Technical assistance will be targeted to the area of need; it will be individualized and focused.

KCEWS and state agencies will continue to work with KWIB to ensure required reports for the performance accountability are completed to the best of the state's ability.

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.

To ensure success, Kentucky requires partnerships between career center offices and representatives of the core and local providers such as adult education centers, career and technical education centers, community colleges and local economic development.

The activities of all career center programs and activities will be assessed through the following mechanisms:

- state and local level fiscal and programmatic monitoring;
- surveys of stakeholders;
- data validation; and
- analysis of data.

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.

Kentucky will develop an appropriate process to ensure adaptation of strategies when subsequent plan modifications occur. In the past, KWIB, in partnership with the Education and Workforce Development Cabinet and numerous partner cabinets, agencies and outside organizations, engaged in an aggressive effort to implement the strategic initiatives outlined in the WorkSmart Kentucky plan adopted in 2010 and updated in 2013. The plan has served as a blueprint for transforming Kentucky's workforce services focused on adapting to the changing needs of employers to create a demand—driven, business—led,

solutions—based publicly funded talent development system for the Commonwealth. Through the work of these initiatives assessment has occurred on several levels for the core programs for several areas.

As a result of key initiatives such as certification, Customer Flow, TBCM and the Workforce Academy, several assessment strategies have been implemented. For example under the Workforce Academy initiative assessment, training strategies have been implemented for certification, Labor Market Information and Transformational Leadership. Two main focus areas over the past two years were Customer Flow and TBCM.

Customer Flow

In July 2014, Kentucky partnered with Maher & Maher to support its career center Customer Flow initiative. Project activities were assessed to determine the state of Customer Flow at that time. Site visits were conducted in each of the 10 career center offices throughout the state. Online surveys were conducted of individual and employer career center system customers to gather their input on the center services they most commonly used and their perceptions of the quality and value of those services. Maher & Maher facilitated a work group meeting of state and local career center system stakeholders to discuss observations from the center visits and survey responses and develop recommendations and potential solutions and strategies for the identified needs and challenges. A comprehensive report was submitted to the state regarding the site visits, surveys and the work— group discussions that contained recommendations for career center customer flow and service delivery enhancements and improvements. In addition, each workforce area received an individual site visit report specific to their location. The recommended areas followed three thematic areas of focus:

- enhancing industry sector focus and business services;
 - re—orienting career center office focus and developing staff; and
 - integrating and diversifying services.
- Each of the thematic areas contained several action steps or strategies for marked areas of improvement. Kentucky plans to further support this initiative in the upcoming year with the provision of technical assistance funds to the 10 workforce areas to address the findings and recommendations identified through this initiative.

Team Based Case Management

The purpose of the TBCM initiative is to set standards for establishing a system of collaborative case management among KCC partners. TBCM builds on the functional alignment within career centers and focuses on providing services to job seekers in a consistent, coordinated and efficient way. The systems and tools used in the TBCM approach reinforce functional alignment and integrated service delivery within the centers and among partner agencies. Vendors worked to coordinate activities under this initiative.

Through its assessment, consultants identified other key actions in the WorkSmart Kentucky Strategic Plan including Kentucky Career Center Customer Flow, Kentucky Career Center certification, Partner for Success and Workforce Academy that aligned closely with the TBCM initiative. WIOA, which was passed during this project, works well with the TBCM initiative because it also emphasizes and strengthens the alignment and integration of services through core partners.

The strategy or approach under this initiative was the development of a steering committee representing all partner agencies. The following three—phased approach was used.

- Phase I: Review and analysis focused on understanding the current status, review of current materials and tools, and best practices research.
- Phase II: Identification and prioritization concentrated on developing the vision and direction for the project (including a stakeholder survey, opinion leaders session, and development of common tools)

- Phase III: Implementation planned on moving the initiative forward through a leadership session, planning sessions and a trainer’s session.

All three phases have been completed and Kentucky is in the process of implementing the strategies outlined under each phase in the final report. Local implementation teams have been formed in each workforce area.

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.

KCEWS and state agencies will partner on a comprehensive approach to evaluation and research. KCEWS has the capacity and expertise to convene the various partners to ensure coordination and effectiveness. Performance accountability measures the following indicators from respective core programs: • job seekers receiving services in required quarters;

- job seekers receiving referrals to partner services in required quarters;
- customers placed in employment in required quarters;
- employer contacts made in required quarter;
- median earnings of customers placed in employment;
- credential attainment;
- measurable skill gains; and
- effectiveness in serving employers.

Evaluation will be conducted based on the indicators listed above. Previously, Kentucky used surveys to measure effectiveness in serving employers in the state. In addition to surveys assessing employer satisfaction, an approach is being considered including a more customizable “point—menu” system awarding points based on the degree of intensity and the value of workforce services provided. Services earning high points would clearly reflect deeper relationships with employers and activities that are the result of longer term relationships.

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),

Youth Funds — WIOA Title I youth funds are allocated to the LWDA's using the formulas and methodologies prescribed in Section 128(b)(2). The standard allocation formula gives equal weight (33.3 percent each) to the following three formula factors:

- Relative number of unemployed individuals in areas of substantial unemployment in each LWDA compared to the total number of unemployed individuals in all areas of substantial unemployment in the State;
- Relative excess number of unemployed individuals in each LWDA compared to the total excess number of unemployed individuals in the State; and
- Relative number of disadvantaged youth in each LWDA compared to the total number of disadvantaged youth in the State. Note: Kentucky has one LWDA that is a designated rural concentrated employment program. The state applies the 90 percent hold—harmless provision contained in WIOA, Section 128(b)(2)(A)(ii).

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

Adult Funds — WIOA Title 1 adult funds are allocated to the LWDAs using the formulas and methodologies prescribed in Section 133(b)(2). The standard allocation formula gives equal weight (33.3 percent each) to the following three formula factors:

- Relative number of unemployed individuals in areas of substantial unemployment in each LWDA compared to the total number of unemployed individuals in areas of substantial unemployment in the State;
- Relative excess number of unemployed individuals in each LWDA compared to the total excess number of unemployed individuals in the State; and
- Relative number of disadvantaged adults in each LWDA compared to the total number of disadvantaged adults in the State. The state applies the 90 percent hold harmless provision contained in WIOA, Section 133(b)(2)(A)(ii).

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

Dislocated Worker Funds - WIOA Title 1 dislocated worker funds are allocated to the LWDAs in accordance with WIOA section 133(b)(2) and TEGL 29-14. The method used to allocate the dislocated worker funds to the LWDAs divides the total dislocated worker funds received by the state into two pools. One pool equals 50 percent of the total received and allocated to the local areas as follows: • 30 percent based on unemployment insurance data, • 40 percent based on unemployment concentrations, • 2 percent based on plant mass layoffs, • 13.5 percent based on declining industries, • .5 percent based on farmer-rancher economic hardship data, and • 14 percent based on long-term unemployment. The other pool equals 10 percent of the total received and allocated to the local areas as follows: • 60 percent based on unemployment concentrations; and • 40 percent based on declining industries. The state is updating its policy that reiterates the language for the distribution of dislocated worker funds that each region is guaranteed to receive an allocation percentage for a year that is no less than 90% of the average allocation percentage of the local area for the prior two years as contained in WIOA, Section 133(b)(2)(B)(iii). The policy should be updated no later than Sept. 30, 2016. The governor may elect to adjust the percentage of the pool amounts or the allocation percentages used to distribute the pools.

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.

Request for Proposal Process and Timeline:

Kentucky Adult Education (KYAE) is the state's eligible agency for adult education programs. KYAE is responsible for administering the funds and providing program/performance oversight to grantees. Eligible providers of local KYAE services, approved under Workforce Investment Act of 1998 requirements, will continue to receive funding through June 30, 2017, as long as they adhere to state and federal grant expectations, as measured through annual applications, financial reports and program performance reports. Competitive process: During grant year 2016-17, KYAE will implement a new competitive application process for all federal AEFLA funding that will determine the eligible providers that will be awarded funds starting July 1, 2017. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate applicants' ability to produce measurable skill gains and other defined metrics. Through this process, KYAE will identify, assess and award multi-year grants (four-year awards) to eligible providers throughout the state. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals. Eligible grant awardees may include: institutions of higher education; public or private nonprofit agencies; libraries; local educational agencies, including educational cooperatives; community-based organizations; public housing authorities; nonprofit institutions, not aforementioned; consortia or coalitions of agencies described above; or partnerships between an entities described above and an employer(s). Regionally-focused/Statewide services: KYAE will encourage applicants to focus regionally using the local workforce innovation board areas as a framework. While the regional areas vary in configuration (number of counties represented), KYAE will ensure all Kentucky counties have access to adult education services. Whereas it will encourage realizing greater efficiencies through regionally-focused, student-needs-driven and industry-sector-focused, and flexible and consolidated, service delivery models, resulting in enhanced performance and accountability. Funding will be distributed based on population needs and performance.

Demonstrated effectiveness: In order for KYAE reviewers to determine "demonstrated effectiveness", all applicants will be required to provide data illustrating their ability to improve skills of basic-skills-deficient adults in applicable academic areas related to the RFP. Previous grantees will be expected to use data from Kentucky Adult Education Reporting System (KAERS) and explain how they met performance measures (established by KYAE) for all student levels, as well as English language learners. New organizations applying for AEFLA funds will be required to provide information and data illustrating their ability to improve the knowledge and skills needed to transition adult students to additional education and training and/or employment. Applications that do not provide adequate evidence, as indicated by the reviewer team scores using the reviewer rubric, will be eliminated from consideration. Additionally, all applicants will be expected to describe service delivery models that maximize effective employment and efficient use of resources. Current timeline: • February 2017: Release four-year federal AEFLA Request for Proposals • February 2017 - March 2017: KYAE provides technical assistance through bidder conferences to potential eligible providers • January 2017 - March 2017: Recruit candidates to review and score RFP • March 2017: Due date for RFP grant applications • March - April 2017: Reviewers review and score (in small, consensus-building groups) RFP grant applications • April 2017: KYAE conduct review of budget and other grant requirements for approved (based on score) grant applications • April - May 2017: KYAE announces AEFLA grant applicants that will receive funding • July 1, 2017: AEFLA grant providers begin grant cycle, programming, and funding

Multi-year grants: KYAE will award multi-year grant to eligible local providers through a competitive RFP process for the purpose of developing, implementing and improving adult education with the state. The grants will be for a minimum of a four-year cycle that applies to all programs.

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.

All KYAE RFPs for all programs competed will adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections Education), 231 (Grants and Contracts for Eligible Providers) and 243 (Integrated English Literacy and Civics Education). All RFPs issued under AEFLA will prescribe to the competitive process outlined above. Applications will be evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement, application and application and review processes will be in effective for all applicants. All applicants will be treated the same manner. The application process will be designed so that direct application to the state eligible agency is clearly evident, customary and non-negotiable. The grant will be awarded directly to eligible and approved service providers and not through third-party agreements.

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 Rehabilitation Act defines the amount of funds each state receives to provide vocational rehabilitation services in Sec. 8 (a). The funding is based on the ratio of the per capita income of each state to the per capita income of the United States for the three most recent consecutive years for which data is available. The funding allotment has a minimum of 33.3 percent and a maximum of 75 percent and is promulgated by the secretary of the U.S. Department of Education from Oct. 1—Dec. 31 of each even numbered year and is in effect beginning the following federal fiscal year.

Kentucky effective October 1, 2018 has one Combined Agency the Office of Vocational Rehabilitation.

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.

Kentucky has the following goals for data alignment and integration:

- development and implementation of a common intake process,
- integration with underlying transactional systems currently in place,
- implementation of a common case management system to ultimately replace the current program—specific transactional systems, and
- reporting from a common data repository.

Existing legacy case management systems across OET and OVR and utilized by the Local Workforce Development Boards are disparate and insular. At the core of Kentucky's current efforts to achieve inclusive and comprehensive interoperability are the following goals:

- Develop or create a reciprocal exchange of distinct data between the common intake system and the legacy transactional systems currently utilized in each agency.
- Convert to a cross—agency common case management system will be executed as current legacy transactional systems are retired. The common case management system will be built using the same technology deployed for the common intake process.

This long—range plan solidifies an enduring and inclusive virtual management system through consolidated customer service. The process for accessing and availing services for all customers including individuals, employers, claimants and training providers, will be facilitated and coordinated via a single point of entry to the system. New data linkages will greatly enhance Kentucky's ability to make real—time and insightful economic, educational and social policy decisions. By eliminating current delays associated with the time required to request, gather and dissect often divergent data sets, agencies will be better equipped to measure the effectiveness of their programs, targeting programmatic and administrative areas for improvement.

More importantly, the system will enable the creation of effective and broad reaching customer awareness and utilization of agencies' broad array of available services. The common data repository built upon the same technology used for the intake and case management processes is integral to this plan as it ensures standardization and integrity of mandated state and federal reporting requirements.

KCEWS collects accurate education and workforce data in the KLDS in order to link the data and generate timely reports about student performance through employment to be used to guide decision makers in improving Kentucky's education system and training programs. (KRS 151B.132,2). KCEWS currently collects data from key State agencies, such as KYAE and OVR and, post—secondary data from public, private and proprietary providers in the longitudinal data system. (KRS 151B.132, 4).

Additional transactional data collected will be added as data systems at State agencies are updated to reflect any changes required to measure the impact of education and workforce programs. The staff at lead state agencies has access to their and other common data through KCEWS' Web Intelligence Business Objects Platform (WEBI). Additionally, KCEWS has the ability to facilitate conversation and set common metrics for education and workforce programs (151B.133, 5).

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.

Kentucky is currently testing a common intake and service delivery approach based on a sales force platform. The initial test will focus on one particular grant and several local career centers. Building blocks that enable this system to serve as an integrated case management system across the majority of core partners and to exchange data with KYAE will be added as priorities are determine and funding becomes available.

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

The Kentucky Education and Workforce Development Cabinet works closely with the governor and will continue to do so as plans for the above goals are finalized and implemented to ensure that Board expertise and leadership knowledge are incorporated.

KCEWS will work with the state board to ensure data and metrics are presented in a timely, accurate fashion. This information will be used to inform the governor about the successes and risks of implementation.

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

KCEWS and state agencies will work with the state board to ensure required reports for the performance accountability are completed to the best of the states ability. An approach Kentucky is actively exploring would house all data required for these reports in the KLDS. The priority is to identify and deploy a third—party, non—agency entity to receive, clean and report from multiple data sources in the short term and ultimately to assist in the development of common reports when the common system is implemented.

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.

KCEWS, along with state agencies and the state board, will have access to pretraining and post—training program information for all individuals receiving services. These measures include entry and exit data, post—secondary data and employment data.

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.)

UI wage record data is already included in the Kentucky Longitudinal Data System and will be used as a key outcome indicator for all training programs, consistent with federal and Kentucky state laws.

Kentucky will continue to use UI wage record data, consistent with federal and Kentucky state law, to validate employment information for the Quarterly Census of Employment and Wages (QCEW) program. QCEW uses this information to meet its federal program deliverables and also provides labor market information on the number of establishments, employment and wages by industry (North American Industry Classification System) within the state.

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.

Only authorized staff may access UI wage record and UI claimant data. Requests for access follow a stringent process that is examined first by the Office of Employment and Training. Upon agency approval, requests are sent to Security Administration within the Commonwealth Office of Technology for approval. Once access has been approved, all users are assigned a unique user name and password. Users access authentication is performed through Active Directory domain controller and multi-level security policies through Resource Access Control Facility (RACF) procedures. In addition, multiple levels, internal and external, of firewall protection prohibit unauthorized access. Finally, annual audits are performed by the Office of the Auditor of Public Accounts, Commonwealth of Kentucky that focus on application security measures and data protection.

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 (JVSF) program's Disabled Veterans' Outreach Program (DVOP) specialist.

Each career center office, along with each of the 10 LWDBs, has received Title 38 U.S.C. 4215(b) and 20 CFR Parts 1010, which provide "Priority of Service" to veterans for all Department of Labor funded programs. Each local career center office has a priority of service poster prominently displayed near the entrance, which defines priority of service and describes who is eligible. Additionally, each customer entering the local office receives a questionnaire used to determine if the customer is priority-of-service eligible. If the customer is an eligible "covered person," he/she receives a fact sheet listing all of the services and programs along with the program's qualifications, which must abide by the Priority of Service mandate. The covered person is then seen by the first available staff person. Additionally, Kentucky's Focus Career system automatically contacts veterans matched to new job orders 24 hours before non-veterans.

Eligible veterans and eligible persons who are determined to have a significant barrier to employment, as defined in VPL 03-14 changes 1 and 2 or most current guidance, are referred to the Disabled Veterans Outreach Program specialist (DVOP). Additionally, any eligible veterans or eligible persons who are part of a designated additional population by the Assistant Secretary, as defined in VPL 04-14 or current guidance, will be referred to the DVOP. These referrals will be made following an initial identification of an SBE through the registration process. Customers registering electronically using Kentucky's Focus Career module will be asked a series of questions to determine if they are priority of service eligible. If they are identified as a covered person, they are presented with a screen defining priority of service and directed to their local career center for further information on services and programs.

Kentucky uses a variety of methods to track the priority of service provision. The state's veterans coordinator analyzes the States Performance Outcome Data each quarter to compare veterans' service rates to non-veterans' service rates. The Managers' Quarterly Report, Compliance Evaluation Reports and the Monthly Veterans' Activities Report are used to monitor priority of service.

Twenty percent of the offices will have a compliance evaluation performed annually. All offices are monitored quarterly through agency reports, which are supplemented by annual self-assessments completed by each local office manager and the Jobs for Veterans State Grant staff. Technical assistance will be provided by the veterans' program coordinator for under-performing offices. Ongoing deficiencies will result in training and corrective action being taken by the program coordinator. The compliance evaluation will determine if the office is adhering to state policy guidance. Additionally, the compliance evaluation will check referral rates, placement rates and staff-assisted service rates for covered persons versus non-covered persons. Case management files, along with veteran outreach activities and internal routing and procedures for services to covered persons, are evaluated to determine if priority of service is being

delivered to veterans. Any deficiencies are recorded and a corrective action plan is prepared in collaboration with the state director of Veterans' Employment and Training.

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.

Accessibility is addressed on several levels and venues in the KCC. Given that OVR staffs are housed in many of the career center offices and are a central part of the workforce programs, there is a heightened sense of assuring this topic is addressed. Accessibility is a part of the required certification process under II. Career Center (office) Management: Physical Infrastructure and Accessibility. The standards that apply to this are as follows:

Standard 1: Career Center offices are accessible so that all customers can fully use services and resources. (ADA compliant checklist) KCC offices:

- are fully ADA compliant;
- are feasible (As new center locations are selected, KCC offices are located in areas that are convenient for their customers, close to major highways, on public transportation routes, centrally—located, close to heavily—trafficked areas such as malls and shopping centers, etc.);
- provide assistive technology to assist customers with disabilities (visual, hearing or physical) so they can access computers and other KCC resources/services;
- evaluate assistive technology annually to ensure that it is up—to—date and fully functioning.
- provide free parking and inclusive parking spaces that are adequate for the average level of customer traffic, especially for individuals with disabilities; and
- make services accessible to customers who have language and literacy barriers (non—English speakers or individuals with hearing impairments, disabilities or literacy/reading barriers).

For assistive technology, the objective is to design a computer workstation/kiosk that can be used by individuals with the widest possible range of abilities and/or circumstances. Kentucky follows the guidelines set forth by the Job Accommodation Network, One—Stop Disability Resource Manual. All Kentucky Career Center offices are expected to ensure universal access to programs and activities for all eligible individuals. Kentucky has taken steps to ensure equitable access to and participation in federally funded programs for all consumers and for agency staff regardless of race, color, national origin, sex, sexual orientation, gender identity or age.

OET will comply with the provisions of the Americans with Disabilities Act (ADA) Public Law 101—336, and applicable federal regulations relating there to prohibiting discrimination against otherwise qualified disabled individuals under any program or activity and adhere to the U.S. Department of Labor Final Rule on Federal Executive Order 11246.

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.

Services have to be accessible to customers who have language and literacy barriers (e.g. non—English speakers or individuals with hearing impairments, disabilities or literacy/reading barriers). Kentucky will provide English learners access to services that assist them in achieving competence in writing, speaking and understanding English.

KCC core programs and partners will work together to increase opportunities in the educational and workforce system for individuals who are English language learners. Adult Education will play a key role as a partner for learners in the Kentucky workforce system. Career center staff will need to be knowledgeable of resources for the English language learner to acquire fundamental literacy skills. These available resources will allow job seekers to improve their skills and be ready for post—secondary education or training, job advancement and economic self—sufficiency.

All Kentucky Career Center offices take necessary steps to ensure that each individual center is in full compliance with federal regulations. Services are available to all customers in their native language when possible. All Kentucky Career Center staff are trained in using interpretation services (Language Lane Telephone Services), as well as the proper staff to have materials translated for customers.

Staff members at each career center office serves as an equal opportunity officer. Staff members receive annual training on the delivery of services to ESL individuals, including proper use of phone interpretation services and obtaining translated materials. This process is overseen by the state's equal opportunity officer and outlined within the Methods of Administration plan filed with the Department of Labor, Civil Rights Center. Additionally, OET has a Limited English Proficiency Policy that addresses procedures for both translation and interpretation for staff and is accessible to all partners on the KCC Team of Experts Web portal.

IV. COORDINATION WITH STATE PLAN PROGRAMS

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

Planning meetings were held jointly with core program staff quarterly for the past 18 months since the enactment of WIOA. The combined state plan programs in Kentucky, in addition to the core programs administered by the Department of Workforce are: Trade Adjustment Assistance (TAA), Jobs for Veterans State Grants (JVSG), Unemployment Insurance and Adult Education under Title II. There was representation at the planning meetings from all core program staff. Leadership from all the combined state programs played an active role in the planning process. Team assignments for different sections of the state plan were given to staff members based on their areas of program expertise. Executive leadership of the combined state plan programs has participated in the WIOA plan work group and writing subcommittees.

Combined state plan program staffs are engaged through WIOA implementation work groups and continue to provide valuable input on multi—agency and partner teams. Vocational Rehabilitation, JVSG, UI and TAA staffs are co—housed with the OET's Division of Workforce Employment Services (Title I) in the same building which enhances communication and opportunities for strategic planning.

V. COMMON ASSURANCES (FOR ALL CORE PROGRAMS)

The Unified or Combined State Plan must include assurances that—

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

VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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

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

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

A. 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.

Kentucky identifies four regions and 10 local workforce areas delivering services as related to WIOA. The four workforce regions have been identified as: • Central Region consisting of the Northern Kentucky, Kentuckiana Works, Lincoln Trail and Bluegrass local workforce development areas. • East Region consisting of the Eastern Kentucky Concentrated Employment Program (EKCEP) and Ten County Area (TENCO) local workforce development areas. • South Central Region consisting of the South Central and Cumberlands local workforce development areas. • West Region consisting of the Green River and West Kentucky workforce development areas. Map of LWDA's and regions can be found here: kwib.ky.gov/LWDARegions.jpg

The 10 local workforce areas are:

- Bluegrass Local Workforce Area composed of Anderson, Bourbon, Boyle, Clark, Estill, Fayette, Franklin, Garrard, Harrison, Jessamine, Lincoln, Madison, Mercer, Nicholas, Powell, Scott and Woodford counties.
- Cumberlands Local Workforce Area composed of Adair, Casey, Clinton, Cumberland, Green, McCreary, Pulaski, Russell, Taylor and Wayne counties.
- Eastern Kentucky Concentrated Employment Program Local Workforce Area composed of Bell, Breathitt, Carter, Clay, Elliot, Floyd, Harlan, Jackson, Johnson, Knott, Knox, Lawrence, Lee, Leslie, Letcher, Magoffin, Martin, Menifee, Morgan, Owsley, Perry, Pike and Wolfe counties.
- Kentuckiana Works — Greater Louisville Local Workforce Area composed of Jefferson, Bullitt, Henry, Oldham, Spencer, Shelby and Trimble counties.
- Green River Local Workforce Area composed of Daviess, Hancock, Henderson, McLean, Ohio, Union and Webster counties.
- Lincoln Trail Local Workforce Area composed of Breckinridge, Grayson, Hardin, Larue, Marion, Meade, Nelson and Washington counties.
- Northern Kentucky Local Workforce Area composed of Boone, Campbell, Carroll, Gallatin, Grant, Kenton, Owen and Pendleton counties.
- South Central Local Workforce Area composed of Barren, Hart, Metcalfe, Monroe, Allen, Butler, Edmon—son, Logan, Simpson and Warren counties.

- TENCO Local Workforce Area composed of Bath, Boyd, Bracken, Fleming, Greenup, Lewis, Mason, Montgomery, Robertson and Rowan counties.
- Western Kentucky Local Workforce Area composed of Ballard, Caldwell, Calloway, Carlisle, Christian, Crittenden, Fulton, Graves, Hickman, Hopkins, Livingston, Lyon, Marshall, McCracken, Muhlenberg, Todd and Trigg counties.

Map of LWDA's for Kentucky can be found here: kwib.ky.gov/LWDAMap.jpg

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.

WIOA Title 1, Chapter 2, Section 106 outlines the requirements and process for the determination of regions and local areas including identification, types of regions, initial designation, subsequent designation, process, considerations, designation on recommendation by the state board and appeals.

Per Training and Employment Guidance Letter (TEGL) 27—14 issued by the U.S. Department of Labor on April 15, 2015, “the governor must develop a policy for designation of local workforce development areas. The purpose of a local area is to serve as a jurisdiction for the administration of workforce development activities using Adult, Dislocated Worker and Youth funds allocated by the State and to coordinate efforts related to the other core programs at a local community level. WIOA Section 106(b) establishes that the governor must designate local workforce development areas (local areas) in or— der for the State to receive Adult, Dislocated Worker and Youth funding under Title I subtitle B. ... The governor must follow the requirements provided in this guidance until the final regulations take effect.”

By July 1, 2015, the governor, in consultation with the Kentucky Workforce Investment Board or its successor (state board), developed a policy and procedure for the designation of all local areas, as well as a policy for the designation of new local areas. The policy included:

- consultation with the state board;
- consultation with the chief elected officials and affected local boards; and
- consideration of comments received through a public comment process.

The public comment period offered adequate time for public comment prior to the designation of the local workforce development area and provided an opportunity for representatives of interested business, education and labor organizations to have input into the development of the formation of the local area.

Specifically, Kentucky took a precise and comprehensive approach to area designation as follows:

- A request was made to the governor for a local area designation..
- KWIB established a steering committee.
- The steering committee developed draft recommendations for consideration based upon data, fiscal integrity and performance of current local areas.
- The Department of Workforce Investment completed local input and public comment sessions and period on recommendations.
- The steering committee considered feedback, federal guidance, reviewed data, performance and fiscal integrity once again and finalized recommendations

- KWIB reviewed the public input received and the final recommendations from the steering committee.
- KWIB made a recommendation to the governor on region and local area designations.
- The governor issued an executive order on regions and local area designation/re—designation.

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

The appeal process is outlined as follows.

- A unit or combination of units of local government or a rural concentrated employment program grant recipient that requests but is not granted designation of an area as a local area under WIOA Section 106(b)(2) or (3) by the governor may submit an appeal to the state board. 29 U.S.C.A. §3121(b)(5).
- The appeal shall be filed no later than thirty days after receipt of the denial of designation of an area as a local area by the governor.
- The appeal shall be conducted pursuant to the administrative hearing requirements in KRS Chapter 13B.
- A unit or combination of units of local government or a rural concentrated employment program grant recipient that is dissatisfied with the decision of the state board may request a review by the U.S. Department of Labor Secretary.
- The request for review shall be filed no later than 30 days after receipt of written notification of the denial from the state board. The request for review shall be submitted by certified mail, return receipt requested, to the secretary, U.S. Department of Labor, Washington, D.C. 20210, Attention: ASET. A copy of the request for review shall be simultaneously provided to the state board in care of the Executive Director, Kentucky Workforce Investment Board, Education and Workforce Development Cabinet, 500 Mero St., Third Floor, Frankfort, KY 40601 and the Executive Director, Office of Employment and Training, 275 East Main St., Frankfort, KY 40621.
- On review, the U.S. Department of Labor secretary shall consider whether:
 - o The unit or grant recipient was not accorded procedural rights under the appeal process set forth in the State plan, or
 - o The unit or grant recipient meets the requirements for designation as a local area under 29 U.S.C.A. § 3121(a)(2) or (a)(3), as appropriate.
- The request for review shall be conducted in accordance with procedures established by the U.S. Department of Labor secretary.
- The U.S. Department of Labor has confirmed that there is no appeal available regarding determinations under WIOA Section 106(b)(4).

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

The appeal process is outlined as follows: • A one-stop partner administering a program described in section 102(b)(2)(D)(i)(IV) may appeal a determination regarding the portion of funds provided by submitting an appeal to the state board.

- The appeal shall be filed with the Board no later than ten business days after receipt of the determination regarding funding.
- The appeal shall be conducted pursuant to the administrative hearing requirements in KRS Chapter 13B.

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.

Early and ongoing system governance policies and guidance are collaboratively developed and are posted at www.kwib.ky.gov/wioa_planning.htm.

POLICY NAME: Workforce Innovation and Opportunity Act -

Interlocal Agreements, Chief Local Elected Official and Local Elected

Official Roles and Responsibilities

Policy Number: 15-002

Date of Issue: March 4, 2015

Effective Date: March 4, 2015

For more info contact: Division Director, Workforce and Employment

Services, Office of Employment and Training (OET), 502-564-5331

Applies /Of Interest To: Local Workforce Development Boards (LWDBs),

Local Workforce Development Areas (LWDAs) staff, Chief Local Elected

Officials and Local Elected Officials

Subject Workforce Innovation and Opportunity Act— Interlocal Agreements and Chief Local Elected Official and Local Elected Official Roles and Responsibilities Purpose This policy provides guidance and clarification to LWDAs relating to the Interlocal Agreement process and the roles and responsibilities under WIOA.

Definitions Chief Local Elected Official (CLEO) - The CLEO is the chief local elected official(s) elected among the consortium of Local Elected Officials representing the Local Elected Officials in the local Workforce Development Area (LWDA).

Local Elected Official (LEO) - The LEOs are the local elected officials of a county. The highest elected official in counties and counties with merged government shall be considered the LEO for their respective county.

Local Workforce Development Board (LWDB) - means a local workforce development board established under section 107, subject to section 107(c)(4)(B)(i).

Interlocal Agreement - a written agreement that specifies the responsibilities of the CLEO and the individual LEO(s).

Background The Workforce Innovation and Opportunity Act (WIOA) of 2014 (Public Law 133-128, July 22, 2014) enacted by the Congress of the United States, provides for federal funds to be granted to states, and for each state's Governor to designate LWDA within the state for the delivery of services and programs under the Act.

WIOA Section 107 provides guidance and direction on the role of the CLEO and LEO in the LWDA as designated by the Governor. OET issuances provide support and clarification to the Act.

Realizing that local employment and training programs cannot be fully effective or implemented without intergovernmental coordination for such reasons that programs and their implementation cross governmental, departmental, agency and political jurisdictions, the LEOs shall enter into a written Interlocal Agreement. The Kentucky Interlocal Cooperation Act, KRS 65.210 through 65.300, permits local

governmental units, upon approval by each fiscal court and the Department for Local Government, to make the most efficient use of their powers by enabling them to cooperate with other localities on a basis of mutual advantage and to thereby provide services and facilities in a manner and form that will best accord with geographic, economic, population and other factors which influence the needs and development of local communities.

Policy INTERLOCAL AGREEMENT

As noted in WIOA Section 107(c)(1)(B), when a LWDA includes more than one unit of government, the LEO of each unit may execute a written agreement that specifies the responsibilities of the CLEO and the individual LEO(s):

WIOA Section 107(c)(1)(B) MULTIPLE UNITS OF LOCAL GOVERNMENT IN AREA.—

(i) IN GENERAL.—In a case in which a local area includes more than one unit of general local government, the chief elected officials of such units may execute an agreement that specifies the respective roles of the individual chief elected officials—

(I) In the appointment of the members of the local board from the individuals nominated or recommended to be such members in accordance with the criteria established under subsection (b); and

(II) In carrying out any other responsibilities assigned to such officials under this title.

(ii) LACK OF AGREEMENT.—If after a reasonable effort, the chief elected officials are unable to reach agreement as provided under clause (i), the Governor may appoint the members of the local board from individuals so nominated or recommended.

Additional OET Guidance/Clarification:

An Interlocal Agreement is required for each LWDA.

The above policy applies except in such areas designated as Concentrated Employment Programs:

In the case of an area that was designated as a local area in accordance with section 116(a)(2)(B) of the Workforce Investment Act of 1998 (as in effect on the day before the date of enactment of this Act), and that remains a local area on that date, the governing body of the concentrated employment program involved shall act in consultation with the chief elected official [CLEO] in the local area to appoint members of the local board, in accordance with the State criteria

established under subsection (b), and to carry out any other responsibility relating to workforce investment activities assigned to such official under this Act. (WIOA § 107(c)(1)(C)).

All LEOs in a workforce area must enter into an agreement that determines how the LWDB nominees will be selected, appointed, removed or reappointed. The process must be documented in the Interlocal Agreement. The LEOs shall enter into an Interlocal

Agreement as a requirement to appoint the LWDB.

In addition to the Interlocal Agreement, the LEOs also shall enter into a Partnership Agreement with the LWDB. The Interlocal Agreement and the Partnership Agreement which are the two governing documents must be consistent. The requirement for consistency applies to any item that is addressed in both governing documents. Both agreements are dynamic documents that can, and should, be amended when a need or

desire arises and the respective signatories agree.

Interlocal Agreement Required Inclusions. LEOs must enter into an agreement with each other that, at a minimum, include the following sections:

(1) State the purpose of the Agreement. Describe the purpose and the term of the Interlocal Agreement (not to exceed five years).

(2) Designation of a Chief Local Elected Official. The CLEOs are required by WIOA to approve or provide guidance on a number of LWDB activities. Therefore the Commonwealth requires LEOs to select a CLEO who will act on behalf of the other LEOs and to include the following information in the Interlocal Agreement:

- a) Selection/appointment process and term of the CLEO, which must include steps to ensure that his/her duties would not create or be perceived to create a conflict of interest between the consortium of LEOs, LWDB, fiscal agent or administrative entity; and
- b) The designation of the CLEO to serve as the signatory for the LEOs;
- c) Outline decisions that may be made by the CLEO on behalf of the LEOs; and
- d) Name, title, and contact information of the appointed CLEO.

To avoid conflict of interest, the CLEO shall not serve as the highest ranking officer on any Board or other entity that governs the fiscal agent or service delivery provider.

(3) Participating Local Elected Officials. The agreement must contain the name, representation, contact information and signature of each LEO in the local area. The Interlocal Agreement shall require a governing board of LEOs and bylaws and shall not be

administratively attached to the fiscal agent, grant sub-recipient, one-stop operator, or service provider.

The LEO governing board shall require a 65% super-majority to take the following actions:

- Selection of the CLEO;
- Designation of the fiscal agent or grant sub-recipient;
- Authorization for the CLEO to request the Governor's consent for the LWDB to be the direct service provider;
- Approval of the LWDB annual budget; and
- Selection of the one-stop operator.

(4) Dispute Resolution. The Interlocal Agreement must state how disputes among LEOs will be resolved regarding LWDB board appointments and carrying out other 4 responsibilities under WIOA.

(5) Fiscal Agent or Grant Sub-recipient Designation. The LEO governing board may designate an entity to serve as the local fiscal agent or local grant sub-recipient for WIOA funds. In making such designation, the LEOs shall carry out a competitive procurement process conducted by the Department of Workforce Investment for fiscal agent services or grant sub-recipient services, including a Request for Proposals that has been reviewed and approved by the Department of Workforce Investment and which provides that proposals will be evaluated and ranked based upon criteria including but not limited to quality of services, demonstrated experience of quality service delivery, cost, conflict of interest policies, and history of fiscal integrity.

Such designation shall not relieve the LEOs of the liability for any misuse of grant funds as apportioned in the Interlocal Agreement.

(6) Grant Recipient/Liability of Funds. The Interlocal Agreement must indicate the LEOs' acknowledgement of financial liability as noted in WIA 107(d)(12)(B)(i)(I) and outline the process for determining each LEO's share of responsibility. This determination could be based on allocation, population, expenditures, or other criteria determined by the LEOs.

The Interlocal Agreement must contain a detailed process for reconciling disallowed costs. In most cases, liability for costs which are recommended for dis-allowance and which are not resolved, rest with the entity responsible for incurring the cost. In the event the entity responsible cannot or will not assume the liability, the Interlocal Agreement must provide the process on how funds will be reimbursed.

(7) Local Area Service Delivery Provider. As authorized in WIOA Section 107(g)(2), a LWDB may provide career services described in WIOA Section 134(c)(2) through a one-stop delivery system or be designated or certified as a one-stop operator only with the agreement of the CLEO and the Governor. See WIOA Policy regarding LWDB Member

Nomination Guidelines, OET Confirmation Process and Board Certification by the (effective 7/1/2015) for conditions to obtain the Governor's consent including a competitive procurement.

In cases where the LWDB does not seek to provide career services, WIOA Section 121(d)(2) states that to be eligible to receive funds under this subtitle to operate a one-stop center, an entity (which may be a consortium of entities) shall be designated or certified as a one-stop operator through a competitive process. This process shall be

outlined in the Partnership Agreement between the LEOs and the LWDB.

(8) Communication. Describe the process and procedures the CLEO will utilize to keep the LEOs informed regarding LWDB activities. Determine how many times a year the LEOs will meet and how often a joint meeting with the LWDB will be held.

(9) LWDB Budget Approval. Describe the process for reviewing and approving the LWDB annual budget among the LEOs. (WIOA Section 107(d)(12)(A).

(10) LWDB Member Representation. Outline how LEOs will ensure LWDB representation is fair and equitable across the LWDA and in accordance with WIOA Policy regarding LWDB Member Nomination Guidelines, OET Confirmation Process and Board Certification—effective 7/1/2015.

Describe the process for determining the initial size of

the LWDB and for selecting, appointing, removing or reappointing LWDB members.

Describe the process to determine the terms of office for Board members. LWDB appointments do not require the signature of all the LEOs, but rather only the signature of the designated CLEO is required, as stated in the Interlocal Agreement.

(11) Selection of a New Chief Local Elected Official. When a new CLEO is selected in accordance with the Interlocal Agreement, the newly selected CLEO must submit to the LWDB and the OET, a written statement acknowledging that he/she:

a) Has read, understands and will comply with the current Interlocal Agreement;

and

b) Apprises OET of the change in CLEO designation.

(12) Election of a New Local Elected Official. When a new LEO is elected within the

LWDA, the newly elected official must submit to the LWDB a written statement acknowledging that he or she:

- a) Has read, understands, and will comply with the current Interlocal Agreement;
- and
- b) Reserves the option to request negotiations to amend the Interlocal Agreement at any time during the official's tenure as a LEO.

(13) Amendment or Change to the Interlocal Agreement. Outline the process to be used

for amendments or changes to the Interlocal Agreement. All amendments or changes must be submitted to the LWDB and the OET after approval by the Department of Local Government in accordance with KRS 65.210 through 65.300.

(14) Single County Local Areas. If any single county local area is designated, the LEO shall execute a written agreement that specifies his or her liability in accordance with WIOA.

(15) Interlocal Agreement KRS requirements. Upon completion of the Interlocal Agreement and all LEO signatures have been recorded on the Interlocal Agreement and approved by each fiscal court, the Agreement shall be sent to the Department for Local Government for approval in accordance with the provisions of KRS 65.210 through 65.300.

Required Action

Upon final approval by all LEOs and the Department for Local Government, the final document shall be submitted to the OET.

Other

References

Workforce Innovation and Opportunity Act (WIOA) of 2014 (Public Law 113-128, July 22, 2014); WIOA—LWDB Member Nomination Guidelines, OET Confirmation Process and Board Certification (effective 7/1/2015); The Kentucky Interlocal Cooperation Act, KRS 65.210 through 65.300.

SECTION I —

REQUIRED PARTNERSHIP AGREEMENT CONTENTS —

JOINT DUTIES FUNCTIONS AND RESPONSIBILITIES

Describe how the LEOs and LWDB will develop and submit a local plan and collaborate with other LWDBs and LEOs to prepare a regional plan for submission to the Governor (WIOA Section 107(d)(1)).

Describe how the LEOs and LWDBs will:

Conduct oversight for local youth workforce investment activities, local employment and training activities, and the one-stop delivery system in the local area. (WIOA 107(8)(A)(i)).

Ensure the appropriate use and management of the funds provided under subtitle B for the activities and system described in clause (i) and for workforce development activities. (WIOA 107(8)(A)(ii)).

Ensure the appropriate use, management, and investment of funds to maximize performance outcomes under section 116. (WIOA 107(8)(B)).

Describe how the LEOs and LWDB will prepare for negotiations with the State on local performance accountability measures. (WIOA Section 107(9)).

Describe how the LEOs and LWDB will designate or certify one-stop operators and the grounds and process for any subsequent termination for cause of the eligibility of such operators.

(WIOA 107(10)(A)(i,ii)).

Describe how the LWDB will develop a local area budget and the process for obtaining CLEO approval.

(WIOA 107(12)(A)).

Describe how operational issues and concerns relating to the designated fiscal agent/grant subrecipient shall be addressed.

Describe the process and procedures to be followed in the event there are unresolved disputes between the LEOs and the LWDB.

3/04/2015

SECTION II -

OTHER ADDITIONAL TOPICS THE PARTIES MAY CHOOSE TO ADDRESS

This confirms that the CLEO, representing the LEOs and the Chair, representing the LWDB, are authorized to sign this agreement, understand the agreement, and agree to the terms and conditions contained in this agreement.

This also confirms that the LEOs and the LWDB have read, understood and agree on the functions, duties and responsibilities of the LEOs (represented by the CLEO) and the LWDB (represented by the Chair) as outlined in WIOA, Public Law 113-128 and in the policies issued by the Office of Employment and Training (OET).

It is further understood that updates and changes that affect this agreement (e.g. changes of CLEO, LWDB chair, policy revision/updates/additions), will require that this agreement be updated and reflect those amendments in Section III of this document. Any amendment must be submitted to OET for prior approval.

CLEO — Print name: Board Chair — Print Name:

CLEO — Signature: Board Chair — Signature:

Date:

ATTACHMENT 1 — WIOA LOCAL BOARDS POLICY

SEC. 3. DEFINITIONS (Most relevant to Boards). Workforce Innovation and Opportunity Act, 29 U.S.C. 3101 et.seq.

(1) ADMINISTRATIVE COSTS.—The term “administrative costs” means expenditures incurred by State boards and local boards, direct recipients (including State grant recipients under subtitle B of title I and recipients of awards under subtitles C and D of title I), local grant recipients, local fiscal agents or local grant sub-recipients, and one-stop operators in the

performance of administrative functions and in carrying out activities under title I that are not related to the direct provision of workforce investment services (including services to participants and employers). Such costs include both personnel and non-personnel costs and both direct and indirect costs.

(9) CHIEF ELECTED OFFICIAL.—The term “chief elected official” means—

(A) the chief elected executive officer of a unit of general local government in a local area; and

(B) in a case in which a local area includes more than 1 unit of general local government, the individuals designated under the agreement described in section 107(c)(1)(B).

(12) CORE PROGRAM.—The term “core programs” means a program authorized under a core program provision.

(13) CORE PROGRAM PROVISION.—The term “core program provision” means—

(A) chapters 2 and 3 of subtitle B of title I (relating to youth workforce investment activities and adult and dislocated worker employment and training activities);

(B) title II (relating to adult education and literacy activities);

(C) sections 1 through 13 of the Wagner-Peyser Act (29 U.S.C. 49 et seq.) (relating to employment services); and

(D) title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.), other than section 112 or part C of that title (29 U.S.C. 732, 741) (relating to vocational rehabilitation services).

(14) CUSTOMIZED TRAINING.—The term “customized training” means training—

(A) that is designed to meet the specific requirements of an employer (including a group of employers);

(B) that is conducted with a commitment by the employer to employ an individual upon successful completion

of the training; and

(C) for which the employer pays—

(i) a significant portion of the cost of training, as determined by the local board involved, taking into account the size of the employer and such other factors as the local board determines to be appropriate, which may include the number of employees participating in training, wage and benefit levels of those employees (at present and anticipated upon completion of the training), relation of the training to the competitiveness of a participant, and other employer-provided training and advancement opportunities; and

(ii) in the case of customized training (as defined in sub-paragraphs (A) and (B)) involving an employer located in multiple local areas in the State, a significant portion of the cost of the training, as determined by the Governor of the State, taking into account the size of the employer and such other factors as the Governor determines to be appropriate.

(23) IN-DEMAND INDUSTRY SECTOR OR OCCUPATION.—

(A) IN GENERAL.—The term “in-demand industry sector or occupation” means—

(i) an industry sector that has a substantial current or potential impact (including through jobs that lead to economic self-sufficiency and opportunities for advancement) on the State, regional, or local economy, as appropriate, and that contributes to the growth or stability of other supporting businesses, or the growth of other industry sectors; or

(ii) an occupation that currently has or is projected to have a number of positions (including positions that

lead to economic self-sufficiency and opportunities for advancement) in an industry sector so as to have a significant impact on the State, regional, or local economy, as appropriate.

(B) DETERMINATION.—The determination of whether an industry sector or occupation is in-demand under this paragraph shall be made by the State board or local board, as appropriate, using State and regional business and labor market projections, including the use of labor market information.

(26) INDUSTRY OR SECTOR PARTNERSHIP.—The term “industry or sector partnership” means a workforce collaborative, convened by or acting in partnership with a State board or local board, that—

(A) organizes key stakeholders in an industry cluster into a working group that focuses on the shared goals and human resources needs of the industry cluster and that includes, at the appropriate stage of development of the partnership—

- (i) representatives of multiple businesses or other employers in the industry cluster, including small and medium-sized employers when practicable;
- (ii) 1 or more representatives of a recognized State labor organization or central labor council, or another labor representative, as appropriate; and
- (iii) 1 or more representatives of an institution of higher education with, or another provider of, education or training programs that support the industry cluster; and

(B) may include representatives of—

- (i) State or local government;
- (ii) State or local economic development agencies;
- (iii) State boards or local boards, as appropriate;
- (iv) a State workforce agency or other entity providing

employment services;

- (v) other State or local agencies;
- (vi) business or trade associations;
- (vii) economic development organizations;
- (viii) nonprofit organizations, community-based organizations, or intermediaries;
- (ix) philanthropic organizations;
- (x) industry associations; and
- (xi) other organizations, as determined to be necessary by the members comprising the industry or sector partnership.

(33) LOCAL BOARD.—The term “local board” means a local workforce development board established under section 107, subject to section 107(c)(4)(B)(i).

42) ONE-STOP PARTNER.—The term “one-stop partner” means—

- (A) an entity described in section 121(b)(1); and
- (B) an entity described in section 121(b)(2) that is participating, with the approval of the local board and chief elected official, in the operation of a one-stop delivery system.

(47) PAY-FOR-PERFORMANCE CONTRACT STRATEGY.—The term “pay-for-performance contract strategy” means a procurement strategy that uses pay-for-performance contracts in the provision of training services described in section 134(c)(3) or activities described in section 129(c)(2), and includes—

- (A) contracts, each of which shall specify a fixed amount that will be paid to an eligible service provider (which may include a local or national community-based organization or intermediary, community college, or other training provider, that is eligible under section 122 or 123, as appropriate) based on the achievement of specified levels of performance on the primary indicators of performance

described in section 116(b)(2)(A) for target populations as identified by the local board (including individuals with barriers to employment), within a defined timetable, and which may provide for bonus payments to such service provider to expand capacity to provide effective training;

(B) a strategy for independently validating the achievement of the performance described in subparagraph (A);

and

(C) a description of how the State or local area will reallocate funds not paid to a provider because the achievement of the performance described in subparagraph (A) did not occur, for further activities related to such a procurement strategy, subject to section 189(g)(4).

(67) WORKFORCE DEVELOPMENT SYSTEM.—The term “workforce development system” means a system that makes available the core programs, the other one-stop partner programs, and any other programs providing employment and training services as identified by a State board or local board.

POLICY NAME: Workforce Innovation and Opportunity Act — Local Elected Official(s) and Local Workforce Development Board Partnership

Agreement

Policy Number: 15-003

Date of Issue: March 4, 2015

Effective Date: October 1, 2015

For more info contact: Division Director, Workforce and Employment

Services, Office of Employment and Training (OET), 502-564-5331

Applies /Of Interest To: Local Workforce Development Boards, Local

Workforce Development Boards’ staff, and Local Elected Officials

Subject Policy on Local Elected Official (LEO) and Local Workforce Development Boards (LWDBs) Partnership Agreement Purpose This policy provides additional guidance relating to the LEOs and LWDBs per Workforce Innovation and Opportunity Act (WIOA), Public Law 113-128. The governance and operation of the Local Workforce Development System is contingent on a successful partnership between the LEOs and the LWDB related to their respective roles which are outlined in this policy and partnership agreement template. This policy and template are provided to ensure that the necessary regulatory and operational elements are described, included and understood by both parties. LEOs and LWDBs may

include additional agreed upon expectations. This partnership agreement will facilitate the delivery of optimal workforce development services for individuals and employers within the Local Workforce Development Areas.

Definitions Chief Local Elected Official (CLEO) - The CLEO is the chief local elected official(s) elected among the consortium of LEOs representing the LEOs in the Workforce Development Area.

Local Elected Official (LEO) - The LEOs are the local elected officials of a county. The highest elected official in counties and counties with merged government shall be considered the LEO for their respective county.

Local Workforce Development Board (LWDB) - means a local workforce development board established under section 107, subject to section 107(c)(4)(B)(i).

Background This policy and template provide the initial foundation for understanding the separate and shared functions of LEOs and LWDBs envisioned under WIOA.

POLICY NAME: Workforce Innovation and Opportunity Act (WIOA) — Local Workforce Development Board (LWDB) Member Nomination Guidelines, Office of Employment and Training (OET/agency) Confirmation Process and Board Certification

Policy Number: 15-001

Effective Date: July 1, 2015

OET Division Director, 502-782-3147

Applies /Of Interest To: Local Workforce Development Boards (LWDBs),

Local Workforce Development Areas (LWDAs) staff, State Workforce Investment Board, Chief Elected Officials (CEOs) and Chief Local Elected Official (CLEO)

Subject Policy on Local Workforce Development Board Member Nominations and Appointments process, OET confirmation process, and Board Certification Purpose This policy provides guidance and clarification to LWDBs regarding local board membership, OET board confirmation process and board certification
Background Replaces Workforce Investment Act (WIA) guidance, policies and processes relating to Local Workforce Investment Boards (LWIBs) - referred to as “Local Workforce Development Boards” in WIOA.

Definitions See Attachment 1 for most relevant definitions relating to this topic.

Policy LOCAL WORKFORCE DEVELOPMENT BOARDS (Sec. 107.)

ESTABLISHMENT (WIOA Sec. 107 (a)); Except as provided in subsection (c)(2)(A), there shall be established, and certified by the Governor of the State, a local workforce development board in each local area of a State to carry out the functions described in subsection (d) (and any functions specified for the local board under this Act or the provisions establishing a core program) for such area.

MEMBERSHIP (WIOA Sec. 107(b)(1) (2) (3) (4)(5) (6))

(1) **STATE CRITERIA.**— The Governor, in partnership with the State board, shall establish criteria for use by chief elected officials in the local areas for appointment of members of the local boards in such local areas in accordance with the requirements of paragraph (2).

(2) **COMPOSITION.**—Such criteria shall require that, at a minimum—

(A) **BUSINESS REPRESENTATIVES-** A majority [51%] of the members of each local board shall be representatives of business in the local area, who—(i) are owners of businesses, chief executives or operating officers of businesses, or other business executives or employers with

optimum policy making or hiring authority; (ii) represent businesses, including small businesses, or organizations representing businesses described in this clause, that provide employment opportunities that, at a minimum, include high-quality, work-relevant training and development in in-demand industry sectors or occupations in the local area; and (iii) are appointed from among individuals nominated by local business organizations and business trade associations.

Additional OET Guidance/Clarification Representatives from private not-for-profit entities that operate as businesses and are employers may be considered business sector members on the local WDB. The not-for-profit entities should align with the key industry sectors for the state and the local area, as identified in the WDB local plan.

Representatives from proprietary schools cannot be considered a business sector member.

MINIMUM number of business representatives: Ten (10)

(B) WORKFORCE REPRESENTATIVES (Labor, Community Based Organization and Youth

Serving Organizations) - Not less than 20 percent of the members of each local board shall be representatives of the workforce within the local area, who—(i) shall include representatives of labor organizations (for a local area in which employees are represented by labor

organizations), who have been nominated by local labor federations, or (for a local area in which no employees are represented by such organizations) other representatives of employees; (ii) shall include a representative, who shall be a member of a labor organization or

a training director, from a joint labor-management apprenticeship program, or if no such joint program exists in the area, such a representative of an apprenticeship program in the area, if

such a program exists;(iii) may include representatives of community based organizations that have demonstrated experience and expertise in addressing the employment needs of individuals with barriers to employment, including organizations that serve veterans or that

provide or support competitive integrated employment for individuals with disabilities; and (iv) may include representatives of organizations that have demonstrated experience and expertise in addressing the employment, training, or education needs of eligible youth, including

representatives of organizations that serve out-of-school youth;

Additional OET Guidance/Clarification

MINIMUM number of workforce representatives: Four (4)

Where possible, align membership with designated state and/or local sectors.

(C) EDUCATION AND TRAINING REPRESENTATIVES - Each local board shall include representatives of entities administering education and training activities in the local area, who— (i) shall include a representative of eligible providers administering adult education and

literacy activities under title II; (ii) shall include a representative of institutions of higher

education providing workforce investment activities (including community colleges); (iii) may include representatives of local educational agencies, and of community-based organizations

with demonstrated experience and expertise in addressing the education or training needs of individuals with barriers to employment;

Additional OET Guidance/Clarification MINIMUM number of education and training representatives:

Two (2)

(D) GOVERNMENT AND ECONOMIC DEVELOPMENT REPRESENTATIVES - Each local board

shall include representatives of governmental and economic and community development entities serving the local area, who—(i) shall include a representative of economic and community development entities; (ii) shall include an appropriate representative from the

State employment service office under the Wagner-Peyser Act (29 U.S.C. 49 et seq.) serving the local area; (iii) shall include an appropriate representative of the programs carried out under

title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.), other than section 112 or part C of that title (29 U.S.C. 732, 741), serving the local area; (iv) may include representatives of agencies or entities administering programs serving the local area relating to transportation,

housing, and public assistance; and (v) may include representatives of philanthropic organizations serving the local area.

Additional OET Guidance/Clarification MINIMUM number of government and economic development representatives: Three (3)

E) OTHER MEMBERS - Each local board may include such other individuals or representatives of entities as the chief elected official in the local area may determine to be appropriate.

(3) CHAIRPERSON.—The members of the local board shall elect a chairperson for the local board from among the representatives described in paragraph (2)(A) [BUSINESS]

4) STANDING COMMITTEES —

A) IN GENERAL—The local board may designate and direct the activities of standing committees to provide information and to assist the local board in carrying out activities under this section. Such standing committees shall be chaired by a member of the local board, may include other members of the local board, and shall include other individuals appointed by the local board who are not members of the local board and who the local board determines have appropriate experience and expertise. At a minimum, the local board may designate each of the following: (i) A standing committee to provide

information and assist with operational and other issues relating to the one-stop delivery system, which may include members representatives of the one-stop partners. (ii) A standing committee to provide information and to assist with planning, operational, and

other issues relating to the provision of services to youth, which shall include community based organizations with a demonstrated record of success in serving eligible youth. (iii) A standing committee to provide information and to assist with operational and other issues

relating to the provision of services to individuals with disabilities, including issues relating to compliance with section 188, if applicable, and applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) regarding providing programmatic

and physical access to the services, programs, and activities of the one-stop delivery

system, as well as appropriate training for staff on providing supports for or

accommodations to, and finding employment opportunities for, individuals with disabilities.

(B) ADDITIONAL COMMITTEES.—The local board may designate standing committees in addition to the standing committees specified in subparagraph (A).

Additional — OET Guidance/Clarification

Committees are encouraged to include non-board members

Committees should be private-sector led

(C) DESIGNATION OF ENTITY.—Nothing in this paragraph shall be construed to prohibit the designation of an existing (as of the date of enactment of this Act) entity, such as an effective youth council, to fulfill the requirements of this paragraph as long as the entity meets the requirements of this paragraph.

(5) AUTHORITY OF BOARD MEMBERS.—Members of the board that represent organizations, agencies, or other entities shall be individuals with optimum policymaking authority within the organizations, agencies, or entities. The members of the board shall represent diverse geographic areas within the local area.

(6) SPECIAL RULE.—If there are multiple eligible providers serving the local area by administering adult education and literacy activities under title II, or multiple institutions of higher education serving the local area by providing workforce investment activities, each representative on the local board described in clause (i) or (ii) of paragraph (2)(C), respectively, shall be appointed from among individuals nominated by local providers representing such providers or institutions, respectively.

Additional — OET Guidance/Clarification

1) Quorum - A quorum shall be defined as :

A simple majority (51%) of members, excluding vacancies AND

Of those members in attendance, no fewer than 51% are a combination of business and workforce representatives.

2) Appointments — LWDB member appointments must be signed by the appointing CLEO and submitted to the Administrative Entity. (Attachment A)

3) Change in Status — Acknowledgement that LWDB members who no longer hold the position or status that made them eligible Local Board members must resign or be removed by the CLEOs immediately as a representative of that entity; i.e. no longer work in the private sector,

or no longer with an educational institution, etc.;

4) Mid-Term Appointment — LWDB members replacing out-going members mid-term will serve the remainder of the out-going member term.

5) Vacancies - LWDB vacancies must be filled within a reasonable amount of time of the vacancy as determined by the LWDA, but no later than 90 days from occurrence. The CLEO in a LWDA is authorized to make all re-appointments of members. Re-appointments must be made

within a reasonable amount of time of the term expiration, but no later than 90 days. Any action taken by a LWDB, with a vacancy or term expiration beyond the time period described in the LWDB by laws or later than the 90 days per this policy shall be void unless the LWDB has

an approved waiver from the Office of Employment and Training prior to the LWDB meeting.

Waivers are to be requested in writing to the Division Director of Workforce and Employment Services, Office of Employment and Training with an explanation of why a vacancy was not

filled in the defined time frame and a description of the process underway to fill the vacancy.

6) Removal - LWDB members must be removed by the CLEO if any of the following occurs: documented violation of conflict of interest, failure to meet LWDB member representation requirements defined in the WIOA and this policy, or documented proof of fraud and/or abuse.

LWDB members may be removed for other factors outlined in the LWDB bylaws such as attendance. OET strongly encourages LWDBs to establish and enforce attendance guidelines for its members. The bylaws must define the specific criteria that will be used to establish just

cause for such removal and the process that will be required to document proof, and the steps regarding filing an appeal and arbitration.

7) Proxy - If a member of a local board is unable to attend a meeting and wishes to send a proxy, that proxy must be from the same category of representation/membership as the member.

APPOINTMENT AND CERTIFICATION OF BOARD — (WIOA Sec. 107 (c))

(1) APPOINTMENT OF BOARD MEMBERS AND ASSIGNMENT OF RESPONSIBILITIES.—

(A) IN GENERAL.—The chief elected official in a local area is authorized to appoint the members of the local board for such area, in accordance with the State criteria established under subsection (b) [MEMBERSHIP].

(B) MULTIPLE UNITS OF LOCAL GOVERNMENT IN AREA.—(i) IN GENERAL.—In a case in which a local area includes more than 1 unit of general local government, the chief elected officials of such units may execute an agreement that specifies the respective roles of the individual chief elected officials— (I) in the appointment of the members of the local board from the individuals nominated or recommended to be such members in accordance with the criteria established under subsection (b); and (II) in carrying out any other responsibilities assigned to such officials under this title. (ii) LACK OF AGREEMENT.—If, after a reasonable effort, the chief elected officials are unable to reach agreement as provided under clause (i), the Governor may

appoint the members of the local board from individuals so nominated or recommended.

(C) CONCENTRATED EMPLOYMENT PROGRAMS.—In the case of an area that was designated as a local area in accordance with section 116(a)(2)(B) of the Workforce Investment Act of 1998 (as in effect on the day before the date of enactment of this Act), and that remains a local area on that date, the governing body of the concentrated employment program involved shall act in consultation with the chief elected official in the local area to appoint members of the local

board, in accordance with the State criteria established under subsection (b), and to carry out any other responsibility relating to workforce investment activities assigned to such official under this Act.

(2) CERTIFICATION

(A) IN GENERAL.—The Governor shall, once every two years, certify one local board for each local area in the State.

(B) CRITERIA.—Such certification shall be based on criteria established under subsection (b),

and for a second or subsequent certification, the extent to which the local board has ensured that workforce investment activities carried out in the local area have enabled the local area to meet the corresponding performance accountability measures and achieve sustained fiscal integrity, as defined in section 106(e)(2).

(C) FAILURE TO ACHIEVE CERTIFICATION.—Failure of a local board to achieve certification shall result in appointment and certification of a new local board for the local area pursuant to the process described in paragraph (1) and this paragraph.

(3) DE-CERTIFICATION

(A) FRAUD, ABUSE, FAILURE TO CARRY OUT FUNCTIONS.—Notwithstanding paragraph (2), the Governor shall have the authority to de-certify a local board at any time after providing notice and an opportunity for comment, for— (i) fraud or abuse; or (ii) failure to carry out the functions specified for the local board in subsection (d).

(B) NONPERFORMANCE.—Notwithstanding paragraph (2), the Governor may decertify a local board if a local area fails to meet the local performance accountability measures for such local area in accordance with section 116(c) for 2 consecutive program years.

(C) REORGANIZATION PLAN.—If the Governor decertifies a local board for a local area under subparagraph (A) or (B), the Governor may require that a new local board be appointed and certified for the local area pursuant to a reorganization plan developed by the Governor, in consultation with the chief elected official in the local area and in accordance with the criteria established under subsection (b).

FUNCTIONS OF LOCAL BOARD (WIOA Sec. 107 (d))

Consistent with section 108 [LOCAL PLAN], the functions of the local board shall include the following:

(Details for each function listed below are in Sec. 107 (d))

1. Local Plan
2. Workforce Research and Regional Labor Market Analysis
3. Convening, Brokering, Leveraging
4. Employer Engagement
5. Career Pathways Development
6. Proven and Promising Practices
7. Technology
8. Program Oversight
9. Negotiation of Local Performance Accountability Measures
10. Selection of Operators and Providers
11. Coordination with Education Providers
12. Budget and Administration
13. Accessibility for Individuals with Disabilities

Additional — OET Guidance/Clarification

LWDBs By-laws to include: LWDB and CLEO agreements with the fiscal agent or grant subrecipient on payment processes and procedures

LWDBs establish by-laws reflecting regional focus per WIOA guidelines

SUNSHINE PROVISION (WIOA Sec. 107 (e))

The local board shall make available to the public, on a regular basis through electronic means and open meetings, information regarding the activities of the local board, including information regarding the local plan prior to submission of the plan, and regarding membership, the designation and certification of one-stop operators, and the award of grants or contracts to eligible providers of youth workforce investment activities, and on request, minutes of formal meetings of the local board.

STAFF (WIOA Sec. 107 (f))

(1) IN GENERAL.—The local board may hire a director and other staff to assist in carrying out the functions described in subsection (d) using funds available under sections 128(b) and 133(b) as described in section 128(b)(4).

(2) QUALIFICATIONS.—The local board shall establish and apply a set of objective qualifications for the position of director that ensures that the individual selected has the requisite knowledge, skills, and abilities, to meet identified benchmarks and to assist in effectively carrying out the functions of the local board.

(3) LIMITATION ON RATE.—The director and staff described in paragraph (1) shall be subject to the limitations on the payment of salaries and bonuses described in section 194(15).

LIMITATIONS (WIOA Sec. 107 (g))

(1) TRAINING SERVICES.

(A) IN GENERAL.—No local board may provide training services.

(2) CAREER SERVICES; DESIGNATION OR CERTIFICATION AS ONE-STOP OPERATORS.

—A local board may provide career services through a one-stop delivery system or be designated or certified as a one-stop operator only with the agreement of the chief elected official in the local area and the Governor.

Additional — OET Guidance/Clarification

To secure the Governor's agreement, the local board must:

conduct a competitive procurement process facilitated by the Department of Workforce Investment for the provision of career services or designation/certification as the one-stop operator;

use a process and RFP that has been reviewed and approved by the Department of Workforce Investment;

be identified as the highest scorer at the completion of the process; and

in cases where the local board has previously provided services, have met performance accountability measures and achieved sustained fiscal integrity.

(3) LIMITATION ON AUTHORITY.—Nothing in this Act shall be construed to provide a local board with the authority to mandate curricula for schools.

CONFLICT OF INTEREST (WIOA Sec. 107 (h))

A member of a local board, or a member of a standing committee, may not (1) vote on a matter under consideration by the local board—(A) regarding the provision of services by such member (or by an entity that such member represents); or (B) that would provide direct

financial benefit to such member or the immediate family of such member; or (2) engage in any other activity determined by the Governor to constitute a conflict of interest as specified in

the State plan.

ALTERNATIVE ENTITY (WIOA Sec. 107 (i))

The State will not recognize or use any alternative local entity.

OET PROCESSES AND PROCEDURES

OET developed form, Attachment A, must be completed for all LWDB member nominations/appointments and be signed by the appointing CLEO and submitted to the Administrative Entity.

OET Review and Confirmation Process OET will review and confirm that the composition of each LWDB, including the nomination and appointment process, complies with the criteria outlined in Section 107 of the WIOA and with OET policy. The composition of each LWDB will

be evaluated annually during the local planning cycle/annual monitoring, reflected in the Appointment and Certification of Board (WIOA Sec. 107 (b) and (c)) and of this policy. This includes the review of:

The OET created Nomination/Appointment form that must be completed for all LWDB member nominations/appointments, be signed by the appointing CLEO and submitted to the Administrative Entity. (Attachment A)

LWDB Roster Forms to be kept current and electronically updated as vacancies are filled, by a designated LWDA staff on the OET/"Team of Experts" website. (Attachment B)

Procedural Available for OET monitoring

Guidance Workforce Innovation and Opportunity Act (WIOA) H.R. 803

Required

Action

LWDAs should review current processes and procedures for compliance per effective date of this policy.

Supersedes/

Replaces

Public Law 105-220 Workforce Investment Act (WIA) of 1998; WIA Regulations, 20 CFR

Part 652 et al, WIA Guidance Memo 03B

Other

References

WIA Guidance Memo 03B

Technology

Implications

Approved policy located on the Kentucky Career Center website/Team of Experts page.

POLICY NAME: Identification of Regions and Designation of Local

Workforce Development Areas

Policy Number: 15-004

Date of Issue: May 14, 2015

Effective Date: May 14, 2015

For more info contact: Department of Workforce Investment

Commissioner, 502-564-0372

Applies /Of Interest To: Local Workforce Development Boards (LWDBs),

Local Workforce Development Areas (LWDAs) staff, Chief Local Elected

Officials (CLEOs) and Local Elected Officials (LEOs)

Purpose To establish policy for identification of regions and designation of local workforce

development areas in compliance with the Workforce Innovation and Opportunity Act

(WIOA) (Public Law 133-128, July 22, 2014).

Background WIOA Title 1, Chapter 2, Section 106 outlines the requirements and process for the

determination of regions and local areas including identification, types of regions, initial designation, subsequent designation, process, considerations, designation on recommendation by the State Board, and appeals.

Per Training and Employment Guidance Letter (TEGL) 27-14 issued by the US Department of Labor on April 15, 2015, "the Governor must develop a policy for designation of local workforce development areas. The purpose of a local area is to serve as a jurisdiction for the

administration of workforce development activities using Adult, Dislocated Worker, and Youth funds allocated by the State and to coordinate efforts related to the other core programs at a

local community level. WIOA Section 106(b) establishes that the Governor must designate local workforce development areas (local areas) in order for the State to receive Adult, Dislocated Worker, and Youth funding under Title I subtitle B. The Governor must follow

the requirements provided in this guidance until the final regulations take effect."

By July 1, 2015, the Governor, in consultation with the Kentucky Workforce Investment Board or its successor (State Board), must develop a policy and procedure for the designation of all

local areas, as well as a policy for the designation of new local areas. The policy must include:

- a. Consultation with the State Board;
- b. Consultation with the chief elected officials and affected Local Boards; and
- c. Consideration of comments received through a public comment process.

The public comment period must offer adequate time for public comment prior to designation of the local workforce development area and provide an opportunity for representatives of interested business, education, and labor organizations to have input into the development of the formation of the local area.

Definitions In addition to the definitions of "performed successfully" and "sustained fiscal integrity" in

WIOA, Section 106(e), the following definitions apply for the purpose of determining initial local area designations in accordance with TEGL 27-14, section 5.C.:

Performed successfully- the local area met or exceeded the levels of performance the Governor negotiated with the local board and chief elected official and the local area has not failed any individual measure for

the last two consecutive program years before the enactment of WIOA (per TEGL 27-14) Exceeded- when the actual performance achieved against an individual performance

measure is in excess of 100 percent of the negotiated level of performance for the measure (per TEGL 25-13);

Met- when the actual performance achieved against an individual performance measure falls in the range of 80 to 100 percent of the negotiated level of performance for the measure (per TEGL 25-13);

Failed- when the actual performance achieved against an individual performance measure is less than 80 percent of the negotiated level of performance (per TEGL 25-13).

Sustained Fiscal Integrity- the Secretary of the US Department of Labor has not made a formal determination that either the grant recipient or the administrative entity of the area misexpended funds due to willful disregard of the requirements of the provision involved, gross negligence, or failure to comply with accepted standards of administration for the two year period preceding the determination (per TEGL 27-14).

Policy IDENTIFICATION OF REGIONS

As noted in WIOA Section 106(a)(1) and (2), the Commonwealth shall identify regions:

(a) REGIONS.—

(1) IDENTIFICATION.—Before the second full program year after the date of enactment of this Act, in order for a State to receive an allotment under section 127(b) or 132(b) and as part of the process for developing the State plan, a State shall identify regions in the State after consultation with the local boards and chief elected officials in the local areas and consistent with the considerations described in subsection (b)(1)(B).

(2) TYPES OF REGIONS.—For purposes of this Act, the State shall identify—

(A) which regions are comprised of 1 local area that is aligned with the region;

(B) which regions are comprised of 2 or more local areas that are (collectively) aligned with the region (referred to as planning regions, consistent with section

3); and (C) which, of the regions described in subparagraph (B), are interstate areas contained within 2 or more States, and consist of labor market areas, economic development areas, or other appropriate contiguous subareas of those States.

LOCAL AREAS

As outlined in WIOA Section 106(b)(1) through (5), the Governor must designate local areas in accordance with the following:

(b) LOCAL AREAS.—

(1) IN GENERAL.—

(A) PROCESS.—Except as provided in subsection (d), and consistent with paragraphs (2) and (3), in order for a State to receive an allotment under section 127(b) or 132(b), the Governor of the State shall designate local workforce development areas within the State— (i) through consultation with the State board; and (ii) after consultation with chief elected officials and local boards, and after consideration of

comments received through the public comment process as described in section 102(b)(2)(E)(iii)(II).

(B) CONSIDERATIONS.—The Governor shall designate local areas (except for those local areas described in paragraphs (2) and (3)) based on considerations consisting of the extent to which the areas—(i) are consistent with labor market areas in the State;

(ii) are consistent with regional economic development areas in the State; and

(iii) have available the Federal and non-Federal resources necessary to effectively administer activities under subtitle B and other applicable provisions of this Act, including whether the areas have the appropriate education and training providers, such as institutions of higher education and area career and technical education schools.

(2) INITIAL DESIGNATION.—During the first 2 full program years following the date of enactment of this Act, the Governor shall approve a request for initial designation as a local area from any area that was designated as a local area for purposes of the Workforce Investment Act of 1998 for the 2-year period preceding the date of

enactment of this Act, performed successfully, and sustained fiscal integrity.

(3) SUBSEQUENT DESIGNATION.—After the period for which a local area is initially designated under paragraph (2), the Governor shall approve a request for subsequent designation as a local area from such local area, if such area—(A) performed successfully;

(B) sustained fiscal integrity; and (C) in the case of a local area in a planning region, met the requirements described in subsection (c)(1).

(4) DESIGNATION ON RECOMMENDATION OF STATE BOARD. — The Governor may approve a request from any unit of general local government (including a combination of such units) for designation of an area as a local area if the State board determines, based on the considerations described in paragraph (1)(B), and recommends to the Governor, that such area should be so designated.

(5) APPEALS.—A unit of general local government (including a combination of such units) or grant recipient that requests but is not granted designation of an area as a local area under paragraph (2) or (3) may submit an appeal to the State board under an appeal process established in the State plan. If the appeal does not result in such a

designation, the Secretary of Labor, after receiving a request for review from the unit or grant recipient and on determining that the unit or grant recipient was not accorded procedural rights under the appeals process described in the State plan, as specified in section 102(b)(2)(D)(i)(III), or that the area meets the requirements of paragraph (2) or (3), may require that the area be designated as a local area under such paragraph.

Additional OET Guidance/Clarification for Regions and Local Areas:

In accordance with WIOA, Section 106(b)(4) and TEGL 27-14, change 1, section 2.A., at any time the CLEO and LWDB from any unit of general local government or combination of units may submit a request for designation as a workforce development area. The State Board

must determine if the request for a new local area meets the considerations required in WIOA section 106(b)(4) and TEGL 27-14, section 5.B. and recommend to the Governor approval or denial of the request. The Governor may approve or deny the request, after

reviewing the State Board's recommendation and the considerations, and notify in writing the CLEO and LWDB. As authorized by TEGL 27-14, change 1, section 2.B., a Concentrated Employment Program

(CEP) grant recipient that requested designation as a local are in accordance with Workforce Investment Act (WIA) section 116(a)(2)(B) and which was designated a local area for the two year period preceding the date of enactment of WIOA may request designation as a local area under WIOA in accordance with the

procedures in 5.C. of TEGL No. 27-14. Any such requests for initial designation are subject to the requirements in WIOA section 106(b)(2) that the CEP local area performed successfully and sustained fiscal integrity.

The process for identification of regions and designation of local areas is as follows:

- ? For a designation of a local area, request made to Governor.
- ? Establish Steering Committee;
- ? Steering Committee develops draft recommendations for consideration;
- ? DWI completes local input and public comment process on recommendations and any other alternatives;
- ? Steering Committee considers feedback, federal guidance and finalizes recommendations;
- ? KWIB reviews the input received and the final recommendations from the Steering Committee;
- ? KWIB makes recommendation to the Governor on region and local area designations;
- ? Governor issues Executive Order on regions and local area designation/redesignation; and
- ? Appeals process is initiated for initial and subsequent designation requests.

The appeal process is outlined as follows:

- 1) A unit or combination of units of local government or a rural concentrated employment program grant recipient that requests but is not granted designation of an area as a local area under WIOA Section 106(b)(2) or (3) by the Governor may submit an appeal to the State Board. 29 U.S.C.A. § 3121(b)(5).
- 2) The appeal shall be filed no later than thirty days after receipt of the denial of designation of an area as a local area by the Governor.
- 3) The appeal shall be conducted pursuant to the administrative hearing requirements in KRS Chapter 13B.
- 4) A unit or combination of units of local government or a rural concentrated employment program grant recipient that is dissatisfied with the decision of the State Board may request a review by the United States Department of Labor Secretary.
- 5) The request for review shall be filed no later than thirty days after receipt of written notification of the denial from the State Board. The request for review shall be submitted by certified mail, return receipt requested, to the Secretary, United States Department of Labor, Washington, D.C. 20210, Attention: ASET. A copy of the request for review shall be simultaneously provided to the State Board in care of the Executive Director, Kentucky Workforce Investment Board, Education and Workforce Development Cabinet, 500 Mero Street, 3rd Floor, Frankfort, KY 40601 and the Executive Director, Office of Employment and Training, 275 East Main, Frankfort, Kentucky 40621.
- 6) On review, the United States Department of Labor Secretary shall consider whether:
 - a. The unit or grant recipient was not accorded procedural rights under the appeal process set forth in the State plan, or
 - b. The unit or grant recipient meets the requirements for designation as a local

area under 29 U.S.C.A. § 3121(a)(2) or (a)(3), as appropriate.

7) The request for review shall be conducted in accordance with procedures established by the United States Department of Labor Secretary.

8) The United States Department of Labor has confirmed that there is no appeal available regarding determinations under WIOA Section 106(b)(4).

Process to Date:

Prior to the issuance of TEGL 27-14, the following activities occurred in accordance with a process adopted by the State Board in November 2014 regarding regional and local area designation based on WIOA Section 106. A Steering Committee was formed including State Board members, state partners, local partners, core programs and stakeholders to consider requests and regions. The Steering

Committee utilized the criteria outlined in Section 106 and other relevant factors to make an initial recommendation on regions and local areas for designation and any re-designation.

Once draft recommendations were formed, a meeting with the current CLEOs was held by the Department of Workforce Investment (DWI). Then a series of three regional convening's in the Eastern, Western and Central part of the Commonwealth were conducted by DWI. The

three convening's included a LEOs session, a Local Workforce Investment Board (LWIB) members session and a Stakeholders session open to system customers, staff, partners and stakeholders. In addition, the recommendations were posted for public comment at the

same time.

After the input sessions were completed by DWI, the Steering Committee met to consider the input received through the multiple forums and insights from State Board WIOA policies and made final recommendations.

The KWIB will review the Steering Committee recommendations and processes.

Determinations by the KWIB will then go to the Governor for review and final action.

Other References

Training and Employment Guidance Letter 25-13

Training and Employment Guidance Letter 27-14

Programmatic and administrative requirements are in a Grantee—Sub—grantee Agreement executed by DWI/OET and each LWDA requiring compliance with all federal and state laws, regulations and any special state requirements.

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

Kentucky will support system transformation and innovation by reviewing results of current and recent projects to identify those that have good results and could benefit from additional resources. Kentucky also will prioritize technology infrastructure to ensure that both individual and employer services are supported by modern, integrated contact and case management platforms and by adequate staff and

customer training. The new governor and his administration will identify new areas of interest and priority that also will be addressed using set aside funding.

Workers who are dislocated due to plant closures and layoffs receive Rapid Response services. Early intervention plays an important role in successful re—employment and can help workers and communities adjust to the effects of layoffs and plant closings. For many workers who have been dislocated, Rapid Response encompasses strategies and activities necessary to (1) plan for and respond to as quickly as possible following either an announcement of a closure or layoff, or mass job dislocation resulting from a disaster, natural or otherwise; and (2) deliver services to enable dislocated workers to transition to new employment as quickly as possible.

The state Rapid Response unit within the Office of Employment and Training (OET) ensures that Rapid Response is provided by the local workforce delivery area and serves as the primary contact for all Rapid Response activities.

The Rapid Response activity in the state is designed to connect the displaced worker to services that will assist transition to new employment following a permanent closure or mass layoff, approved trade—impacted events or a natural or other disaster resulting in a mass job dislocation.

Each local workforce development area has a Rapid Response team responsible for the coordination of activities with the local workforce investment board and appropriate locally elected officials.

The team has a local area coordinator who is responsible for reporting Rapid Response activities through EKOS, a comprehensive integrated management and reporting system that allows one—stop partners to share information on one—stop activities.

OET allocates funding to the local areas for Rapid Response services.

OET receives notices of impending layoffs via WARN Act notices, media releases, the governor’s office and referral for services from supporting partners, i.e. KCED, Labor Market Information programs, local boards and chief elected officials. OET informs local Rapid Response team coordinators of the impending layoff, and they contact the company to develop an appropriate plan for the employer, communities and workers.

In addition to alerting the local Rapid Response team coordinator, impending layoff notices are communicated to cabinet leadership, KCED, WIOA directors, OET regional managers and others specifically requesting to be included on the notification list. Relevant local community agencies are notified.

This decentralized Rapid Response process allows for a quicker response at the local level. The local Rapid Response team coordinator (or designee) ensures that Rapid Response services are provided as quickly as possible. The local coordinator immediately contacts the company upon learning of an actual or possible dislocation.

Whenever possible, all contact occurs prior to a layoff date, is onsite at the company and is on company time. The team is trained to react quickly and offer a customizable service that fits the needs of the employees and the company.

The local Rapid Response team’s first step is an on—site employer meeting with the company to explain the Rapid Response process and services and how the services can be most successful. The team discusses resources and services available to help the employer manage the layoff and identify the specific needs of the affected employees.

Using information gained from the employer assessment and onsite meeting, the Rapid Response team develops a plan of action for delivering necessary services to the workers. An appropriate specialized service plan for Rapid Response is then developed. Employee Rapid Response services may include specialized workshops, job fairs and/or other enhanced services at the request of the company or local officials.

Rapid Response activities include services from the following agencies:

- state and local economic development
- state and local Unemployment Insurance Benefit Programs
- Labor Market Information programs of OET, KYAE, CPE, OVR
- local health departments
- Trade Adjustment Assistance Program
- the USDOL Employee Benefit Security Administration • LWIOA one—stop system Dislocated Worker Program services

There is a seamless transition between Rapid Response services and the one—stop activities for affected workers by immediately directing the affected workers at the Rapid Response service to the local one—stop system for supportive services.

Employees and employers receive one—stop service information during their respective service sessions. Employee service sessions offer filing information for unemployment benefits and assessments of need. Employees are registered with Focus Career at a Rapid Response event prior to layoff when possible. Having all Rapid Response service sessions conducted at the local level allows one—stop staff to make a personal connection and build relationships with employees and employers.

Also during the initial on—site meeting, the local coordinator assesses whether the employer meets the criteria of a trade impacted employer in accordance with the standards established by the Trade Adjustment Assistance Act as amended. The local coordinator assists the employer with the completion and submission of a trade petition to the Office of Trade Adjustment Assistance.

States also should describe any layoff aversion strategies they have implemented to address at—risk companies and workers.

As for statewide layoff aversion strategies, OET within the Kentucky Career Center, provides workforce development solutions throughout the business cycle to all customers including work—based alternative training models, layoff aversion strategies and Rapid Response. These were implemented to address at—risk companies and workers. Kentucky’s dedicated Business Services Teams have the established relationships, resources and networks with employers for customizing the best service plans, including layoff aversion, to meet the employer’s needs for seamless service delivery using the collective resources of the Commonwealth’s workforce development system. The goal is to provide support to companies not only as they are downsizing but during the whole business life cycle.

Kentucky’s state Rapid Response functions as a service of our Business Services Teams within OET and partner agencies. All business services team partners refer to Rapid Response as a last resort after all other layoff aversion strategies have been exhausted.

Business Services Teams engage in several partnerships to expand the range and quality of the services available to companies and affected workers and to develop an effective layoff aversion early layoff—warning network.

Partnerships have been established with KCED, the Labor Market Information programs of OET, local boards and chief elected officials to meet the needs of the employer and employee. The Business Services Team’s positive, proactive business—friendly service is promoted when layoff aversion services can provide labor pool data to KCED.

The data is used to verify an existing skilled workforce in a particular area for employers wishing to relocate to the area or to expand and/or upgrade operations. Useful information can be gleaned from a variety of sources including labor market information to identify declining sectors.

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.

Rapid response encompasses strategies and activities necessary to (1) quickly respond following a closure or layoff announcement or to a mass job dislocation resulting from a disaster, natural or otherwise; and (2) enable dislocated workers to transition to new employment as quickly as possible. In cases of natural disasters, the provisions of Rapid Response emergency assistance are adapted to the particular disaster; the Kentucky Career Center (KCC) Rapid Response Unit collaboratively assists at the direction of the Kentucky Emergency Management (KEM) at <http://kyem.ky.gov/> and Federal Emergency management Association (FEMA) at www.fema.gov/. If reasonable, necessary and allowable, rapid response may provide guidance and/or financial assistance to establish local community transition teams to assist the impacted community in organizing support for the dislocated workers and in meeting the basic needs of their families, including heat, shelter, food, clothing and other necessities and services that are beyond the resources and abilities of KCC. Beyond an immediate and initial response by rapid response if deemed necessary, KCC Rapid Response Unit will coordinate with KEM and FEMA to organize and manage the delivery of services for the project, including the local workforce development area local Rapid Response teams. This would include coordination and submission of an application for a National Dislocated Worker Grant, if needed. The following guidelines will be followed with who is responsible for the action, as a result of a disaster: 1. Identify the local WIOA area(s) affected and the specific counties — KCC state Rapid Response Unit; 2. Contact appropriate WIOA area designees for both the workforce development board and fiscal agent — KCC state Rapid Response Unit; 3. Reach out to KEM and FEMA — KCC state Rapid Response Unit; 4. Ensure strong communication and collaboration between the KCC Rapid Response efforts and the work of KEM/ FEMA- KCC state Rapid Response Unit; 5. Discuss extent of the disaster and current dislocated worker fund availability — Kentucky Career Center state Rapid Response Unit; 6. Discuss projected participant service levels and re-employment needs to address the results of the disaster — KCC state Rapid Response Unit; 7. Provide a copy of the rapid response additional assistance funding request forms to the local WIOA area(s) for additional needed funds — KCC state Rapid Response Unit; 8. Process and review the Rapid Response additional assistance application and process accordingly for a recommendation to fund — KCC state Rapid Response Unit ; 9. Inform local WIOA area designee that award has been approved by KCC Rapid Response Unit; and 10. Consider applying for a national dislocated worker grant — KCC state Rapid Response Unit The policies and protocols developed through this collaboration will be used in the event of any additional significant natural disaster.

D. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED. (SECTION 134(A)(2)(A).) THIS DESCRIPTION MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE TRADE-AFFECTED WORKERS IN THE GROUPS IDENTIFIED IN THE TAA PETITIONS WITH AN ACCURATE UNDERSTANDING OF THE PROVISION OF TAA BENEFITS AND SERVICES IN SUCH A WAY THAT THEY ARE TRANSPARENT TO THE TRADE-AFFECTED DISLOCATED WORKER APPLYING FOR THEM (TRADE ACT SEC. 221(A)(2)(A) AND SEC. 225; GOVERNOR-SECRETARY AGREEMENT). DESCRIBE HOW THE STATE WILL USE FUNDS THAT HAVE BEEN RESERVED FOR RAPID RESPONSE TO PROVIDE SERVICES FOR EVERY WORKER GROUP THAT FILES A TAA PETITION.

In Kentucky, the Rapid Response program operates in essentially the same manner regardless of whether a TAA petition or certification is involved.

The state extends Rapid Response services to all worker groups (or on an individual basis, if applicable) covered by a TAA petition just as it provides Rapid Response services to any worker group that has been or will be permanently laid off.

In most cases, the state and its local Rapid Response team are already aware of a given dislocation event and Rapid Response activities are underway before a TAA petition is filed. If a TAA petition is the first notice of a dislocation event, the state will notify the local Rapid Response team, which will contact the employer and associated union(s) to plan worker transition services.

The minimum level of services extended must conform to established requirements described in the Statewide Activities section. When Rapid Response is extended to potentially TAA eligible worker groups, basic TAA program information must be shared, including the program enrollment process should certification occur. If the state does not have access to the worker group prior to layoff; the state will use UI claimant information to identify potentially affected workers. In this situation, the local Rapid Response team will be required to extend outreach to the laid off workers using contact information obtained from UI.

At minimum, the outreach materials must include information about the WIOA Dislocated Worker Program and basic information explaining the TAA program.

A local area may request Rapid Response funding in the form of Dislocation Grants and Additional Assistance Grants to serve potentially TAA—eligible worker groups in the same manner it requests funds for all other worker groups. The only difference is that Additional Assistance funding can't be used to fund training once a worker group is covered by a TAA certification. If a TAA petition is certified, the state's TAA program is responsible for identifying individuals potentially eligible under the certification through worker lists supplied by the employer and/or UI claimant information.

The TAA program then uses a standard mailer to contact the potentially eligible individuals, inviting them to attend a Trade Orientation Session to learn about program benefits and register. At Trade Orientation Sessions, TAA program staff review program benefits, the process for accessing the benefits, and critical deadlines. Orientation participants are also provided written materials and referred to a handbook that covers the TAA program benefits, specific to the participant's TAA amendment year.

A representative from the WIOA Dislocated Worker program is present during orientation sessions to cover basic information about that program, enrollment and an explanation of the advantages of dual enrollment.

Kentucky is committed to continually exploring ways to make TAA program information more user friendly and improve coordination between the TAA and WIOA programs. Rapid Response teams are familiar with benefits and services offered under the trade program and attend all local or statewide trade training's.

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.

WIOA's primary focus beyond reauthorizing core workforce investment programs is to get employers and employer associations more actively involved in planning and providing training. Legislation reforms the system to promote training for existing, in-demand jobs and training aligned with business needs, and state and local economic development plans. Registered apprenticeship, on-the-job training (OJT), incumbent worker training, transitional jobs, work experience and customized training are all alternative work-based

training services offered in Kentucky. These work-based training models are customized to meet job seeker and employer needs. Registered Apprenticeship (RA) is an important component of potential training and employment services that the Kentucky workforce system can provide to customers. Today, the need for skilled tradesmen or craftsmen in Kentucky is more critical than ever. Apprenticeship is a training system that produces highly skilled workers who are able to meet the demands of employers who are competing in a highly competitive environment. The U.S. economy faces increasing competitive global pressure daily. Kentucky not only finds itself economically competing with other states but with the entire manufacturing world. The most important asset any region or state must possess in today's competitive market is a highly trained and skilled workforce. One significant way to create and maintain a skilled workforce is through a highly effective on-the-job apprenticeship training program. A unique feature of the apprenticeship concept is that on-the-job training is supplemented with technical classroom instruction. Qualified journey workers guide apprentices to develop their chosen trade or skill and learn the techniques, materials and equipment associated with that trade. Classroom instruction that provides training in theoretical and technical aspects of the trade is required. Minimum class time is 144 hours for each year of apprenticeship, but may be higher for some trades. Apprentices are generally evaluated every six months and receive pay raises based upon their proven progress in skill development as well as their classroom proficiency. When a registered apprenticeship program sponsor verifies that the apprentice has fulfilled all requirements of the training program, the Labor Cabinet will issue a completion certificate. This nationally recognized certification verifies apprenticeship completion as a fully qualified skilled worker in the trade. We encourage local areas to use RA, and it should be used more often as a career pathway for job seekers and as a job-driven strategy for employers and industries. RA is funded through several mechanisms. In Kentucky, RA programs are more directly connected to the public workforce system. RA programs automatically qualify to be placed on the Kentucky Eligible Training Provider List (ETPL), allowing workforce development to support participants in RA programs and more directly connect those programs to one-stop centers.

Registered Apprenticeship Benefits

For employers:

- skilled workers trained to industry/employer specifications to produce high quality results,
- reduced turnover,
- increased productivity,
- industry's need to remain competitive by investing in the development and continuous upgrade of the skills of its workforce,
- reduced worker compensation costs due to an emphasis on safety training, and
- compliance with federal and state equal opportunity requirements facilitated.

For apprentices and journey workers:

- jobs that usually pay higher wages,
- higher quality of life and skills versatility,
- portable credentials recognized nationally and often globally, and
- opportunity for college credit and future degrees.

For Kentucky:

- highly skilled workforce,
- increased competitive edge in a global economy,
- system to contribute to and sustain economic growth, and
- decreased need to import skilled workers.

On-the-Job Training In Kentucky, OJT is time limited contractual training that is provided by an employer in the public, private non-profit, or private sectors to a customer that is paid while engaged in productive work in a job that:

- provides knowledge or skills essential to the full adequate performance of the job; and
- is made available through a program that provides reimbursement to the employer of
- up to 50 percent of the wage rate of the participant, except as provided in WIOA section 134(c)(3) (H), for the extraordinary costs of providing the training and additional supervision related to the training; and
- is limited in duration as appropriate to the occupation for which the customer is being trained, taking into account the content of the training, the prior work experience of the customer, and the service strategy of the customer, as appropriate.

Positive features of OJT are:

- The customer begins training as a permanent employee with the employer and is subject to the same conditions of employment as other similarly employed customers; and
- The customer starts earning a wage immediately and receives employer sponsored benefits when they are available; benefits such as health insurance, retirement, etc.
- The customer receives training in a production setting, under appropriate supervision, gaining knowledge of the job and acquiring and applying occupational skills while performing on the job. Training time leads to greater proficiency in the occupation for which the training is being provided. OJT is a critical tool that helps Kentucky job seekers enter into successful employment. OJT continues to be a key method of delivering training services to our adults and dislocated workers. WIOA directs states and local areas to provide up to 50 percent of the wage rate of the customer

to employers for the costs of training while the customer is in the program. Additionally, Kentucky and LWDA's have the flexibility under WIOA to increase the reimbursement level to up to 75 percent taking into account the following factors: • characteristics of the customer (e.g. length of unemployment, current skill level and barriers to employment); • size of the employer (e.g. small and medium-sized business often have more barriers to participation at lower reimbursement rates); • quality of employer-provided training and advancement opportunities; and • Other factors the state or local boards may determine appropriate (e.g. the number of employees participating in the training, wage and benefit levels of the employees (both pre- and post- participation earnings)), and relation of the training to the competitiveness of the customer).

Incumbent worker training In Kentucky, Incumbent worker training (IWT) provides both workers and employers with the opportunity to build and maintain a high quality workforce. Incumbent worker training is used to help avert potential layoffs of employees or to increase the skill levels of employees so they can be promoted within the company and create backfill opportunities for the employers. Kentucky defines an incumbent worker as a participant who is employed, meets Fair Labor Standards Act requirements for an employer-employee relationship and has an established employment history with the employer for six months or more. IWT is an in-demand industry sector or occupation training designed to meet the special requirements of an employer (or group of employers) to retain a skilled workforce or avert the need to lay off employees by assisting workers in obtaining the skills necessary to retain employment and conducted with a commitment by the employer to retain or avert laying off incumbent worker(s) who are trained to increase the competitiveness of the employee and/or employer. Under section 134(d)(4) of WIOA, local areas use up to 20 percent of their adult and dislocated worker funds to provide for the federal share of the cost of providing Incumbent Worker training. IWT needs take into account the following factors: • characteristics of program participants • relationship of the training to the competitiveness of a participant and the employer • Other factors the state or local boards may determine appropriate (e.g., the number of employees participating in the training, wage and benefit levels of those employees (both pre- and post-participation earnings)) and the existence of other training and advancement opportunities provided by the employer). Employers are required to pay for a significant cost of the training for participants in incumbent worker training; this can be done through both cash and/or in-kind payments. The wages paid to participants while in training may be considered as a source of matching funds. Official payroll records documenting the worker's hours and wages must be used to determine the amount of the employer's share of cost. Rules for matching funds are provided in the Uniform Guidance and DOL exceptions at 2 CFR 200.306 and 2 CFR 2900.8, respectively. Under section 134(d)(4) (D) of WIOA, the minimum amount of employer share in the Incumbent Worker Training depends on the size of the employer: • Employers with 50 or fewer employees the employer must contribute at least 10 percent of the cost; • Employers with 51 to 100 employees the employer must contribute at least 25 percent of the cost; • Employers with more than 100 employees the employer must contribute to at least 50 percent of the cost. **Transitional Jobs** In Kentucky, transitional jobs are a new type of work-based training allowed under WIOA. Transitional jobs are subsidized time-limited work experiences in public, private or nonprofit sectors for barriers-to-employment individuals who are chronically unemployed or have an inconsistent work history and are combined with comprehensive career and supportive services. The goal of transitional jobs is to establish a work history for the individual who demonstrates work- place success and develops the skills that lead to entry into and retention in unsubsidized employment. Unlike OJT, there is no assumption that the individual will be retained in his or her transitional job after the experience is over, though that would be a successful experience and outcome. Under section 134(d) (5) of WIOA, local areas may use up to 10 percent of their adult and dislocated worker funds to provide transitional jobs to customers.

A Transitional Job is: • time limited, wage paid work • supportive services • skills development • job development and retention services The goals of a Transitional Job are: • stabilize with income • learn experientially • address barriers build work history • access incentives • develop skills • transition to permanent employment Transitional Jobs benefit: • youth not working or in school • people reentering from prison • people who are homeless • long-term recipients of public assistance Other benefits of

Transitional Jobs and subsidized employment are: • economic stimulus • increased tax payment • benefits to employers • reduced recidivism

Work Experience In Kentucky, work experience is a planned, structured, time-limited learning experience that takes places in a workplace for a customer who needs assistance in becoming accustomed to basic work requirements. A work experience may be paid or unpaid, as appropriate. A work experience may be provided in the private for-profit, non-profit or public sectors. Labor standards apply to any work experience in which an employee/employer relationship exists under applicable law. Work experiences help customers obtain the needed skills to succeed in the workplace. Work experience for a customer in WIOA is classified as an Individualized Career Service, and work experiences provide a helpful means for a customer to gain experience that leads to unsubsidized employment. Customers may be referred for full or part-time work experiences depending on a customer's assessed needs.

Customized training Customized training in Kentucky is a means by which a single employer or group of employers identify skills needed in their workforce and obtain skills training in a customized format. Custom training can be designed for both employed and unemployed training participants. The purpose of customized training is to tailor it to the needs of the employer rather than offer a "cookie-cutter" approach to training. Customization occurs in the training modality as well as when and where the training is offered. Customized Training is for existing or newly created industry partnerships that identify a common set of skills needed in applicants. The training can be delivered pre-hire for customers who otherwise meet the hiring qualifications for that group of employers. The training is delivered as either an individualized career service for the participant and the employer. The commitment on behalf of the employer is to offer interviews to anyone who completes the training program. Customized Training is designed primarily for the individual who does not have the related education, training or work experience required to obtain employment. It may be provided in various occupational areas and lowers the employer's risk in hiring and training new personnel. For the WIOA eligible participant, Customized Training allows him or her to gain the knowledge and skills necessary to perform a job after he or she has been hired and retain employment. Kentucky's local workforce development areas use this variety of training models for WIOA-eligible youth and unemployed or underemployed adults and dislocated workers as a service through Kentucky Career Center Business Service teams, a partnership of state agencies, local workforce development boards, education stakeholders and nonprofit partners. The customized use of these work based alternative training models is determined based on the best method to meet the needs of the participant and the employer. A comprehensive needs assessment for the employer and the trainee is completed and a cross analysis for which work based alternative training model should be considered and implemented for success of the trainee and the best service for the employer. Kentucky Career Center Business Service teams, statewide, strive for the service goal to help employers find, train and keep the best talent and assists Kentuckians finding, obtaining and keeping the very best jobs.

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).

To provide better and more diverse opportunities to WIOA eligible participants, an enhanced effort has been made to increase the awareness and accessibility to registered apprenticeship (RA) programs within the Commonwealth.

A strategic partnership between the Education and Workforce Development Cabinet's Department of Workforce Investment and the Labor Cabinet's Department of Workplace Standards (DWS) ensures thorough communications and promotes a clearer path for participants to succeed with the job—driven opportunities that registered apprenticeship programs offer.

This integration will be facilitated and planned out through:

- discussions between the Department of Workforce Investment and DWS leadership staff pursuing ways for both agencies to increase access to registered apprenticeship programs.
- discussions with Eligible Training Provider List (ETPL) staff and registered apprenticeship staff to ensure proper delivery of information to both apprenticeship programs and local workforce agencies regarding ETPL and RA requirements.
- ETPL staff presentations at RA conferences and other meetings discussing ETPL requirements and providing on-site assistance with registering RA programs.
- training for career center regional leadership regarding programs and available offerings.
- presentations by DWS staff to ETPL coordinators from each of the 10 local workforce agencies so staff is well versed in sharing basic information about the RA program, including occupations eligible for apprenticeship programs, sponsors in their respective areas and the application process with area career planners.
- training's for business service teams so they can promote the development and implementation of new RA programs to employers and direct them to the appropriate DWS staff when necessary.

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).

Overview of Kentucky ETPL System

In August 2015, Kentucky unveiled its new Eligible Training Provider Listing (ETPL) website. This site represents an overhaul of the Kentucky system and a renewed emphasis on ETPL and providing the highest level of services to qualified participants. The system, which is web-based, represents a shift from the paper application system and allows for increased oversight, enhanced reporting and a much greater ease of access for all stakeholders. This system, managed by the state ETPL coordinator, allows for all partners to operate easily within the framework of one system, thus significantly enhancing operational effectiveness. The system has been received positively from both providers and local workforce areas and praised for its ease of usage by WIOA participants. The application process within the system is also managed by the coordinator, as well as the approval process. This represents a drastic change in process, as previously the provider application process was handled solely at the local area level, and only the coordinator, who works in the central office, was responsible for collecting local information to create and disseminate the state list. Another added benefit of the system is creating a uniform application process for providers statewide, whereas in the past there were varying procedures and protocols across the state. Providers can access the system at one point and make their programs available statewide. The system also fulfills the requirement of making the state list public by housing an advanced search engine, allowing anyone the ability to search programs and offerings in a variety of useful ways. As you can see, the system allows for a wide-ranging variety of searches so the end-user can make the best informed decision possible. And, because the engine is housed within the same platform that provider and state staff use for the application process, all information is real-time and current and not dependent on an upload or other process. This is a major upgrade from previous versions as the searchable database was only updated periodically when information was submitted. Another helpful feature is the ability for the end-user to print results from any searches or queries they may have performed. From the perspective of the provider, this system creates a far more efficient way to provide information to the state. Previously, providers would submit multiple paper copies to local areas each year to gain access to the system. Making changes was difficult and time consuming and often times the same information was submitted year after year. With the new system, the provider enters information regarding the agency and programs once and will have the opportunity each year to go in and resubmit or edit. Also, providers can go in at any time during the year and request to add a

new offering to accommodate students, and this can be approved and live on the site within minutes.

Application Process (excluding Registered Apprenticeship programs) The majority of the application process, with two slight variations, is the same for all programs (non-RA) across the board. The entire process is conducted completely online and can be used from a wide array of platforms and machines. The application process falls into the submission of three types of information: 1. information regarding the training provider agency, 2. information about program offering, and 3. student data collection. Currently, components one and two are collected on the ETPL website as outlined in the previous section. At this time, component three is collected through a partner agency, the Kentucky Center for Education and Workforce Statistics. More detailed information regarding that agency and process will follow. The following is an overview of the steps involved in completing the application process.

Step 1: Creation of account on ETPL website (<https://etpl.ky.gov>). During this phase, providers are asked to create an account to access the system, along with basic information. This allows a security mechanism to eliminate duplicate accounts and only allow access to the system to legitimate providers. Providers must give basic information such as Federal Employee Identification Number, an email address and designate their “Provider Type.” Providers fall under one of four categories: • HEA Title IV funded school, • proprietary schools, • registered apprenticeship, or • other (includes non-profits and schools such as cosmetology, faith based and mortuary science schools that do not fall under the purview of proprietary education). The provider type is very important moving forward as the requirements of the application vary slightly based on provider types. For example, if a school selects “proprietary,” then it must include certification from the Kentucky Commission on Proprietary Education later in the application process to continue. Another example is for providers associated with the Registered Apprenticeship Program, which will be discussed later in this document. Upon completion, the provider submits the account information for approval. Once the information is reviewed by the state ETPL coordinator, approval is sent to the provider and they may now access the system.

Step 2: Complete the provider application. The provider application is located within the ETPL system, and captures pertinent information about the training provider. Providers must complete this step successfully before training programs will be considered for approval and inclusion. Information collected on the application includes: • year institution established • proprietary license number (if applicable) • refund policy information • narrative discussions regarding: o ability to provide training to individuals who are employed o ability to provide training to individuals with barriers to employment o how the provider is partnered with local businesses o how training services are aligned with local in-demand industry sectors and in-demand occupations • compliance with Americans with Disabilities Act (ADA) • proposed training site accessibility to those with limited mobility o how student data is collected for submission Additionally, within this section providers are required to submit a copy of the Equal Opportunity Employment Plan or other agency policy addressing non-discriminatory practices, as well as a copy of the agency’s Limited English Proficiency Plan (LEP) or other documentation of a strategic effort to provide services to those with limited English proficiency. This allows for EO monitoring to be completed via desk audit with every program on the list initially.

Step 3: Complete program application. Providers will complete an application for each program they wish to be included on the ETPL. Information collected includes: • program name • classification of instructional programs code • training program description • how long the program has been in existence • plans to track student data for program for submission HEA program approval • degree/certificate to be awarded • training program length • online availability • training program costs (tuition, fees, textbooks, supplies, miscellaneous) • training program address information (Providers with programs at multiple locations/campuses do not have to submit multiple applications. Instead, they can list multiple locations for each program.)

Step 4: Register and upload student level data with the Kentucky Center for Education and Workforce Statistics (KCEWS). KCEWS was created in 2012 to expand upon the work of the Kentucky P-20 Data Collaborative, including maintaining the Kentucky Longitudinal Data System (KLDS), which facilitates the integration of data from the Kentucky Department of Education (KDE), the Council on Post-secondary Education (CPE), the Educational Professional Standards Board (EPSB), the Kentucky Higher Education Assistance Authority (KHEAA) and the Kentucky Education and Workforce Development Cabinet. KCEWS

has the authority to collect and link data to evaluate education and workforce efforts in the Commonwealth. This includes developing reports and providing statistical data about these efforts so policy makers, agencies, and the general public can make better informed decisions about Kentucky's education systems and training programs, KRS 151B.132. The center must also ensure compliance with the federal Family Education Rights and Privacy Act, 20 U.S.C. sec 1232g, and all other relevant federal and state privacy laws, KRS 151B.133(12). Because of its expertise in data collection and an established systemic infrastructure, KCEWS was the ideal partner for OET to collect student level data to be used for determining performance data for the ETPL. Providers are given detailed instructions on how to register, as well as templates for submitting student data. Colleges and universities that submit their student level data to CPE are exempt from this step, as KCEWS already has access to that data. Application Process for Registered Apprenticeship Programs

Because of the difference in the nature and oversight of the programs, the path for application is somewhat different for RA programs. By WIOA statute, all RA programs that express interest in being listed on the ETPL must be included (WIOA Section 122). RA providers still must create an account and register for the ETPL site as other providers must. However, they do not have the provider application as their inclusion in the state RA listing serves as approval. They do, however, complete a modified application. This process allows interested RA programs to be fully included in the ETPL yet does not subject them to the full application process that other schools must complete. Once the program applies, and inclusion is re-verified with current standing on the state RA listing, the program is approved and placed on the website. Approval Process Once the provider has completed all necessary steps within the ETPL website and successfully uploaded the required student data, the state ETPL coordinator will begin the process of reviewing and approving programs. Initial Eligibility Programs that meet all requirements and fall within one of the in-demand industry sectors utilized within the 10 local Workforce Development Areas will be approved. The requirements are as follows: 1. Submission of Student Level Data for requested time period 2. Submission of Provider Equal Employer Opportunity (EEO) Policy and Plan for Working with Limited English Proficient (LEP) individuals 3. Assurance of Americans with Disability Act (ADA) Compliance 4. Program falls within industry sector currently being utilized by one of the 10 local Workforce Development Areas 5. Submission of requested program information for each program, including narrative discussions regarding: —ability to provide training to individuals who are employed —ability to provide training to individuals with barriers to employment —how the provider is partnered with local businesses —how training services are aligned with local in-demand industry sectors and in-demand occupations 6. Submission of all related training program costs and expenses Programs will have initial eligibility for a one federal program year (Oct. 1 through Sept. 30). At the end of the initial year, programs will be held to subsequent eligibility requirements. Registered Apprenticeship programs are exempt from this process. They will follow the guidelines set forth previously in this document. Programs that do not meet all requirements or fail to send complete information will be placed in pending status until the requirements met. Programs that fall under the "Proprietary" category can also be placed in pending status if there is an issue with their good standing status with the Commission on Proprietary Education. Once resolved, they can be placed in good standing immediately. Subsequent Eligibility Determination Programs will be evaluated on a biannual basis to determine subsequent eligibility. As of July 1, 2016, the current standards for subsequent eligibility for providers will be set at meeting benchmarks of at least 50 percent completion rates with a 20 percent entered employment rate. These rates are calculated based on student data information submitted each year. It is anticipated that as more data is collected, these rates will change and additional benchmarks will be developed.

Removal from ETPL

Programs may be removed from the ETPL by one of two manners:

- in writing, request to be removed from the ETPL for any reason, at any time or
- for willfully and knowingly submitting false information.

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.

The preliminary policy requires local areas to record the priority of service category in the state's case management system (EKOS). Local areas must have written policies that delineate how they will give priority of service and must adhere to these policies. OET will conduct semi—annual desktop reviews and provide technical assistance to local areas that do not have the 50 percent or more, per the preliminary policy, of their adult participants enrolled into one of the priority categories. Participants served as incumbent workers are excluded from the priority calculation.

Local Workforce Development Areas (LWDAs) must develop policies to ensure compliance with WIOA priority of service requirements. Policies must include strategies by KCC operators and service providers to recruit individuals in the priority of service categories and how they will provide appropriate services to meet those population needs.

Operators are to regularly review the percentages of WIOA Title I Adult participants who are priority participants and adjust strategies as needed to reach the goal of enrolling at least 50 percent of adults as priority participants, per the preliminary policy.

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

Kentucky's Policy 16-008, Transfer of Funds between the Adult and Dislocated Worker Formula Funds, was developed by the Kentucky Career Center (KCC) Inter-agency Policy and Guidance Committee. It was distributed to and reviewed by system stakeholders and approved by the Committee and management. It is posted on the KCC Team of Experts website.

This policy provides the guidance and parameters for transferring up to 100 percent of a program year allocation for adult employment and training activities, and up to 100 percent of a program year allocation for dislocated worker employment and training services between the two programs. This authority is provided under WIOA as long as the request meets the governor's approval.

The policy includes the following information: 1. Requesting of funds — The transfer request must be submitted on the form attached to the policy and contain the following information: • situation necessitating the transfer (e.g. depletion of current funds, why a need to transfer, etc.); • how the funds transfer will impact the participant levels in both programs; • transfer's effect on potential recipients of services under each funding stream; and • description of expected impact of WIOA performance outcomes for both funding streams.

The form must indicate the grant numbers (From and To), amounts currently obligated, balances and amount of unobligated, as applicable.

The policy includes information on: • Funds not subject to transfer: Adult or dislocated worker funds reallocated by OET; funds awarded to the state under a National Dislocated Worker Grant (NDWG); funds reserved under the governor's 15 percent discretionary rules; and youth funds. • Considerations: Transfer requests may be submitted anytime during the two-year life of the funds. Funds transferred must stay within the original year of obligation and within their respective obligation time period. Accordingly, local areas cannot transfer funds between program years. In addition, local areas must ensure that its funds are not overdrawn during the time a transfer takes place. If this condition occurs, the transfer will not be approved. • Implications of transferring 100 percent of funds: Local areas may not apply for additional assistance funds based on the contention of dislocated worker allocation "formula insufficiency" resulting

from the transfer. However, if a local area transfers 100 percent of its dislocated worker formula funds and a dislocation event occurs in the local area (e.g., specific employer layoff or disaster that changes the local economic conditions), the state will consider a local area request for additional assistance funds on a case by case basis. • Monitoring: At the local level, the workforce development area and/or the fiscal agent must conduct oversight of the transfer of WIOA adult and dislocated worker funds to ensure the transfer is being completed per the policy. Through the state’s monitoring system, fiscal monitors will review the area’s transfer of adult and dislocated worker funds during the annual on-site monitoring review for compliance with federal and state laws and regulations. Any issues will be handled through the state’s monitoring resolution process. • Submission process: LWDAs shall submit the completed form to the performance unit mailbox, performanceunit@ky.gov, for processing. • References: §683.130

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)

The awarding of grants in a competitive or non—competitive process is completed in accordance with the Kentucky’s procurement policy. When considering the ability of providers to meet performance accountability measures based on primary indicators of performance for the youth program, local boards will review performance history, stability of the program, collaboration with service providers and other components. Performance will be reviewed and analyzed at both the state and local level to ensure the youth elements are being made available to all youth and that youth are meeting the expectations outlined in the grants.

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.

Kentucky is very early in the planning process in developing comprehensive, integrated out—of—school youth strategies. The state has a project identified using the current governor’s discretionary funds to support state and regional level efforts to restructure youth service strategies around in—school youth and out—of—school youth. The plan is to emphasize building a state—level work—based learning continuum with consistent definitions, performance metrics and high—quality service indicators across multiple state level partners. Additionally resources will also be provided on a regional basis to assist in service redesign, training for service providers and employer outreach efforts.

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)

Kentucky will use funds to ensure that all youth program elements are made available to youth. The Commonwealth supports the local workforce areas in designing youth programs tailored to the needs of in—school and out—of school youth in local communities. Monitoring and technical assistance continue to be provided to ensure that local area policies and procedures meet requirements of the WIOA youth program design. Dedicated OET youth program staff disseminate updates and guidance from the U.S. Department of Labor and others. Performance information, reports and training are provided to staff. Best practices are shared at all levels, including presentations at regional DOL events.

Local areas encourage youth to use one—stop services as needed. Areas have designed special referral processes for youth who come into one—stops and one area has developed a one—stop career center specifically for youth.

KWDB’s strategic plan has incorporated a variety of approaches for expanding and enhancing outreach to youth. An example is the High School Outreach initiative designed to increase

communication and collaboration between workforce boards and boards of education, technical education, post—secondary education and economic development.

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.

The local board, with assistance from state level staff, shall establish a definition and eligibility documentation requirements for the “requires additional assistance to complete an educational program, or to secure and hold employment.” The state has defined “requires additional assistance to complete an educational program, or to secure and hold employment” as:

- Has been fired from a job within the 12 months prior to application OR
- No previous work experience/never held a job OR
- Has never held a full—time job (30+ hours per week) for more than 13 consecutive weeks OR
- Difficulty with social interaction or behavioral problems OR
- History of family disruptions, such as divorce, legally separated parents, family violence, alcohol or drug abuse; one or more parents incarcerated OR
- A student participating in an alternative program/setting OR
- Has chronic attendance or discipline problems OR
- Functioning at least one or more grade levels below his/her age group in the areas of reading and math (for youth 18—24 if they are functioning at grade 11 or under) OR
- A student who has failed two or more subjects during the prior two years of school attendance OR
- One or more parent lacks high school diploma/GED

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.

158.030 “Common school” defined — Attendance at public school and primary school program — Advancement without regard to age — Local boards to adopt policy establishing petition and evaluation process for students who do not meet age requirements.

(1) “Common school” means an elementary or secondary school of the state supported in whole or in part by public taxation. No school shall be deemed a “common school” or receive support from public taxation unless the school is taught by a certified teacher for a minimum school term as defined by KRS 158.070 and every child residing in the district who satisfies the age requirements of this section has had the privilege of attending it. Provided, however, that any child who is 6 years of age, or who may become 6 years of age by October 1, shall attend public school or qualify for an exemption as provided by KRS 159.030. Any child who is 5 years of age, or who may become 5 years of age by October 1, may enter a primary school program, as defined in KRS 158.031, and may advance through the primary program without regard to age in accordance with KRS 158.031(6).

(2) Beginning with the 2017—18 school year, any child who is 6 years of age, or who may become 6 years of age by Aug. 1, shall attend public school or qualify for an exemption as provided by KRS 159.030. Any child who is 5 years of age, or who may become 5 years of age by Aug. 1, may enter a primary school program, as defined in KRS 158.031, and may advance through the primary program without regard to age in accordance with KRS 158.031(6).

(3) Each local school board shall adopt a policy to permit a parent or guardian to petition the board to allow a student to attend public school who does not meet the age requirements of subsection (1) or (2) of this section. The policy shall include an evaluation process that will help determine a student’s readiness for school and shall ensure that any tuition amount charged under this policy is the same amount charged to a student who meets the age requirements of subsection (1) or (2) of this section. Students enrolled under this policy shall be included in a school’s average daily attendance for purposes of funding as provided in KRS 157.310 to 157.440.

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.

Kentucky’s Policy 16-009, Definition of Basic Skills Deficient, was developed by the Kentucky Career Center (KCC) Inter-Agency Policy and Guidance Committee in collaboration with Adult Education. It was distributed to and reviewed by system stakeholders and approved by the committee and management for posting to the KCC Team of Experts website.

This policy is to provide direction on a statewide and system-wide understanding of the term “basic skills deficient.” In addition to the definition provided by the Workforce Innovation and Opportunities Act (WIOA) 3(5)(A)(B), Kentucky seeks to expand and further clarify the definition for (B).

The policy includes the following information:

Per WIOA 3(5) (A)(B), the term “basic skills deficient” means, with respect to an individual,

(A) who is a youth, that the individual has English, reading, writing or computing skills at or below the eighth grade level on a generally accepted standardized test; or (B) is a youth or adult who is unable to

compute or solve problems, or read, write or speak English at a level necessary to function on the job, in the individual's family or in society.

For portion (B), the Office of Employment and Training (OET) provides the following additional clarification/guidance for making this determination by defining it as an individual who meets any one of the following: • Lacks a high school diploma or equivalency and is not enrolled in secondary education; or • Scores 8.9 or below on the Tests of Adult Basic Education (TABE); or • Is enrolled in a Title II Adult Education and Family Literacy Act (AEFLA) program (including enrolled for English as a Second Language (ESL)); or • Has poor English language skills (and would be appropriate for ESL even if the individual isn't enrolled at the time of WIOA entry into participation); or • The case manager makes observations of deficient functioning and records those observations as justification in a case note.

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).)

This section does not apply as Kentucky is not a single—area state.

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:
 - A. SUPPORTING EMPLOYER ENGAGEMENT;
 - B. CONNECTING EDUCATION AND TRAINING STRATEGIES;
 - C. SUPPORTING WORK-BASED LEARNING;
 - D. IMPROVING JOB AND CAREER RESULTS, AND
 - E. OTHER GUIDANCE ISSUED BY THE DEPARTMENT.
5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER, INCLUDING HOW THE WAIVER WILL IMPACT SERVICES FOR DISADVANTAGED POPULATIONS OR INDIVIDUALS WITH MULTIPLE BARRIERS TO EMPLOYMENT; AND
6. DESCRIBES THE PROCESSES USED TO:
 - F. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
 - G. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;
 - H. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;
 - I. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.
 - J. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT
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;

Kentucky has not requested any waivers under WIOA, but seeks continuation of previously approved applicable waivers as specified in TEGL 1—15.

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.

Partner for Success

This initiative seeks to move the state from a confederated set of agencies to a unified system focused on investment in workforce. The initiative seeks to streamline services to employers and customers and leverage resources and share the credit for outcomes while providing opportunities for individuals at all levels of the system to take ownership in the vision, direction and return on investment made by the department.

Workforce Academy

This initiative seeks to address and improve customer service at all levels of the Commonwealth's workforce system. The Workforce Academy seeks to achieve system—wide consistency in its approach to customer service and has contracted an outside consulting firm to develop the plan for customer service re—training and roll—out to all staff across the state

Employ Kentucky Operating System (EKOS) Training

The EKOS allows staff to document services provided to our customers. Training is provided within two months of hire and a refresher course is offered three months after basic training is completed. This training is provided in connection with Focus/Career and Focus/Talent training. Service training is provided to experienced staff as an advanced EKOS training.

Focus Suites

This system allows customers to search for jobs, employers to post jobs and search for candidates and enables staff to view and monitor the activity for eligibility compliance while ensuring customers and employers have provided all necessary information for the system to properly function. Focus/Career and Focus/Talent training is provided within two months of hire and a refresher course is offered three months after basic training is completed. This training is provided in connection with EKOS training. Job Order Writing Training and Focus/Assist training are provided to staff with job order writing responsibilities. Training takes place as determined by local office management.

Unemployment Insurance Claimstaker Training

Unemployment insurance benefits are a big part of the services provided to our customers across the state who experience job loss through no fault of their own. Claimstaker training encompasses assisting customers with filing and managing their unemployment insurance benefits claim. Training will be divided into three levels, basic, intermediate and advanced. New staff will receive basic training within three months of hire. Once staff has completed their initial probation period of six months, they will take intermediate training within three months of their probation completion. Experienced staff will receive advanced training at the local management's discretion to ensure all staff is properly trained on current issues and advanced claimstaker issues to best equip the local offices to effectively handle all issues.

Unemployment Insurance Disputed Claims Investigator Training

Unemployment Insurance benefits are a big part of the services provided to our customers across the state that experience job loss through no fault of their own. Disputed claims investigator training encompasses the disputed claims branch which ultimately reviews disputed unemployment insurance claims to determine customer eligibility to receive benefits. Training is divided into two levels, basic and advanced. New staff in the disputed claims branch will receive basic training within three months of hire. Staff members will receive advanced training at the branch manager's discretion to ensure staff is properly trained to handle advanced issues.

Personal Professional Development Training

All staff has the ability to participate in personal professional development courses offered to the agency by the Governmental Services Center. Staff can enroll in and attend courses to improve communication, problem-solving and business writing skills and a wide variety of topics to assist them in performing their daily job functions.

Supervisor Training

Upon promotion or hire into a management or supervisory position within the agency, all managers will be enrolled into the KEWDC's Management Academy. The Management Academy currently consists of online courses including: merit system basics, hiring the best, investing in your people, solving problems, effective communication and conflict resolution. The program will eventually be expanded to include three additional courses on various leadership topics.

Program Specific Training

The agency offers a wide range of services tailored toward specific customers including military service veterans, disaster victims and large plant or employer closure customers. Training programs are developed for staff members to ensure they are able to deliver effective services to address customer needs. These training's are developed by the department to effectively deliver services to customers.

Develop Department Policies

As the agency grows, management will continue to review existing policies, adjust them to address current needs and develop new policies as the need arises. This will ensure the agency is operating and utilizing resources as effectively as possible.

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.

Unemployment Insurance (UI) and Workforce Employment Services both are under the umbrella of the Department of Workforce Investment. Professional staff members in each area communicate regularly and coordinate any UI law, program or service changes. Kentucky Career Center staff notify UI of eligibility issues when they arise. Dialogue between the departments of UI and employment services leaders results in shared and agreed upon best practices. When there are changes and/or eligibility issues addressed by Employment Services and WIOA staff members, step-by-step instructions are provided. Written guidance letters and processes are available via webinars, conference calls and informational printed materials.

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 employment services staff members listen to issues from individuals and assist the individuals in the following ways:

- using the UI website for information and other resources available to UI claimants;
- providing current UI basic information, approved by UI, to the individual to assist in determining eligibility for claimant;
- working with the claimant through the online application process.

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

- When individuals apply for unemployment, they are required to register in Focus Career, Kentucky's employment website.
- The Kentucky Employment Network (KEN) works with UI customers who are profiled as likely to exhaust UI benefits. KEN consists of a workshop that informs the customer of the programs available through the Kentucky Career Center.
- Re—employment Services and Eligibility Assessment (RESEA) works with UI customers who are profiled as likely to exhaust UI benefits. The grant activities consist of a Kentucky Career Center orientation, job search overview, Individual Employment Plan (IEP) and referral to job services.
- The KCCGO! Dislocated Worker Grant has offered the opportunity to leverage key KWIB strategic plan initiatives including Unified Business Services, Career Center Certification and Sector Strategies and focus those improvements intensively on the long—term unemployed. The KCCGO! grant made available \$4,775,418 to local workforce development areas to provide re—employment services including training costs for OJTs, Internships, Registered Apprenticeships, Accelerating Opportunity Scholarships, Work Experience/Tryout Employment, Customized Training, and other training in targeted sectors.

Customers can come to the local career center for additional services, which may include:

- o information, services, assistance, assessments and job search,
 - o computer and technology skill enhancement,
 - o resume development,
 - o interview skills,
 - o GED assistance,
 - o educational opportunities,
 - o short—term training, o career assessments,
 - o resource room assistance,
 - o computer access for job searching, writing and printing resumes, online employment applications and assistance with employment opportunities locally, regionally and statewide, and
 - o outreach, which can include meeting clients elsewhere.
- Registering on the Focus Suites programs (Focus Talent, Focus Career and Focus Assist) assist customers, job seekers and employers to search for jobs and post jobs and Focus Assist allows Kentucky Career Center staff members to assist the customers.
 - GED and other educational assistance

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;

Wagner—Peyser (WP) services in local Kentucky Career Center offices are based on an all—inclusive philosophy. There are no eligibility requirements or program specific requirements as a barrier to accessing comprehensive, quality, group and individual services provided by Wagner—Peyser staff.

Workforce Employment Services staff make certain UI claimants stay on track with necessary services to utilize UI while working toward their next employment opportunity. Workforce Employment Services staff

enter specific UI claimant information into the Job Service computer database to track services accessed by claimant. UI software captures that data daily to assure claimants are participating in a full range of services to increase the opportunity and goal of employment.

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

State requires UI claimants be registered on the state labor exchange, Focus Career website, within a specific time period to secure UI benefits. The state also requires UI claimants to follow through with additional services, most generally provided by W—P staff, and as recommended by WP staff as a criteria to continuation of UI benefits, in a specific timeframe determined by UI and recorded in data base by WP staff.

3. ADMINISTRATION OF THE WORK TEST FOR THE STATE UNEMPLOYMENT COMPENSATION SYSTEM, INCLUDING MAKING ELIGIBILITY ASSESSMENTS (FOR REFERRAL TO UI ADJUDICATION, IF NEEDED), AND PROVIDING JOB FINDING AND PLACEMENT SERVICES FOR UI CLAIMANTS; AND

UI claimants are required to complete one documented work search weekly. Work searches can be completed electronically and sent directly to UI, and/or WP. Staff members review work searches to determine if searches fall within the UI guidelines and provide guidance on work search. If an eligibility question arises, WP staff would contact UI and provide information and documentation for UI to determine eligibility issues. UI claimants have access to all comprehensive services, support and assessment services available, as well as individually designed service and guidance, if needed. All technological, individual and group opportunities are available and accessible to assist in job finding and placement.

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

KCC Resource Room, with available computers, and one—on—one assistance for job searching, resume creation, online application assistance is available to all job seekers. When individuals meet with a WP Employment and Training Specialist — referrals are made to partners and WP staff for a wide range of needs to increase current and future employment options. Included would be any application adaptation or assistance that may be needed for the job seeker and/or UI claimant. Examples include:

- Re—Employment Services — KEN and RESEA provided for UI claimants
- WIOA program referrals provided to eligible participants
- Office of Veterans Services available and referrals to Vets
- On—Site Tech College services for GED assistance and other educational opportunities and options
- WP Employment and Training Specialists provide individual and group services
- WP Career Counselor referrals: assessments, WorkKeys, TABE are examples
- WIOA staff for eligible job seekers — services may include short term training to increase employment options and opportunities
- All referrals are entered into the database for informational purpose and follow up with job seekers.

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.

Farm workers in the state of Kentucky have unique needs of finding employment outside farm work and meeting their training needs. Currently the Commonwealth of Kentucky helps MSFW find employment through the 11 certified full service career centers throughout the state. These Career Centers offer services to help with resume preparation, interviewing skills, completion of applications and other services provided by Career center partners. The Career centers also provide training to develop the skills today's employers want. These training may be provided through the Career Center or the many partners. The partners included but are not limited to the KCTCS, WIOA, OVR, OTB, Kentucky Farm Works Program, Experience Works Program.

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.

In Kentucky, the five top labor—intensive crops are tobacco, produce, livestock, row crops and industrial hemp.

Because agricultural employers continually need more workers, employers rely heavily on hiring foreign workers due to the scarcity of a local agricultural workforce.

Tobacco companies are reducing the number and size of contracts with farmers. Most reduction in tobacco has taken place in the western part of the state with reduction up 25 percent. There is a projected increase in the production of industrial hemp. Over the next three years, there will be increase in the production of industrial hemp from 2,500 acres to more than 200,000.

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.

Mexico is the predominate country of origin of the MSFW in Kentucky, and most of these workers speak Spanish. This information must take into account data supplied by WIOA section 167 of the 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 Employment and Training Administration.

2. OUTREACH ACTIVITIES

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

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

Because this population is so transient, outreach to Migrant Education Program could be a source to contact additional farmworkers. The Migrant Education Program is an organization that reaches out to the children of farmworkers, so by using this organization, KCC could reach another cohort of the population. Kentucky will continue to reach out to other agencies to provide the best services possible to MSFWs.

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.

The MSFW Program works with all KCC statewide partners to ensure that MSFW participants receive all the services provided by KCC. All MSFW participants are made aware of farmworker rights with respect to the terms and conditions of employment.

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

KCC services including vocational rehabilitation; blind services; employment and UI services; the Kentucky Farmworker Program; and Experience Works, a service offering training through the Senior Community Service Employment Program (SCSEP) to low-income older workers in 60 counties in Kentucky, are available to all MSFW participants. All MSFWs have access to the KCC offices.

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.

Staff members provide outreach to MSFWs at the more than 32 certified and uncertified KCC offices across the state. KCC provides the job seekers with one-on-one employment services including resume writing, interviewing techniques and job application completion. Additionally KCC provides a Web-based program, Focus Career, that helps the job seeker develop a resume and track job leads on the Internet. Staff members also are active in the regional business service teams and have a Web-based program called Focus Talent that allows employers to search online for qualified candidates.

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

KCC and the Kentucky MSFW program work closely with the Kentucky Farmworker (NFJR Grantee) program to employ farmworkers throughout Kentucky in full-time employment outside agriculture and high paying job within agriculture. The Kentucky MSFW program also works with Migrant Education and migrant health programs to provided needed services the MSFW participants.

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

Describe the State agency's proposed strategies for:

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

- XI. HOW CAREER AND TRAINING SERVICES REQUIRED UNDER WIOA TITLE I WILL BE PROVIDED TO MSFWS THROUGH THE ONE-STOP CENTERS;
- XII. HOW THE STATE SERVES AGRICULTURAL EMPLOYERS AND HOW IT INTENDS TO IMPROVE SUCH SERVICES.

KCC provides the job seekers with one—on—one employment services including resume writing, interviewing techniques and job application completion. Additionally, KCC provides the job seeker with a Web—based program, Focus Career, which helps develop a resume and track job leads online.

Staff members are active in the regional business service teams and have a Web—based program, Focus Talent, that allows employers to search online for qualified candidates

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

Posters are located in all KCC offices with instructions on how and where to file a complaint.

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

Information on the Agricultural Recruitment System is provided at employer meetings and at agricultural trade shows.

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).

NFJP staff will continue have access to the systems used by the Kentucky Career Centers. KCC began establishing relationships with Kentucky Migrant Education Program and the Kentucky Migrant Health Care System over the last year. KCC will continue to build a better working relationship with both agencies.

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.

KCC will provide a copy of the AOP to NFJP grantees along with other agencies and organizations for comment and suggestion.

The agencies that will provide a copy of the AOP are:

- Kentucky Farm Worker Programs Inc.
- Kentucky Migrant Education Program
- Kentucky Migrant Health Care Program
- Kentucky Farm Bureau Federation
- Agriculture Workforce Management Association, Inc.

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.

KCC has met its goals in regards to services to the MSFWs identified in the job service system. KCC plans to work with the other agencies to better reach the MSFW population and make it aware of KCC services.

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.

KCC representatives were not able to attend Migrant Education and Health Care programs functions last year due to schedule conflicts and lack of adequate staffing.

E. STATE MONITOR ADVOCATE

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

The state monitor advocate has been involved with the AOP.

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)).

Kentucky was one of the first states to adopt the National Governors Association, Council of Chief State School Officers' Common Core State Standards at all educational levels (P—12), postsecondary and adult education. Kentucky Adult Education (KYAE) recognizes the critical need for aligning adult education curricula to meet the higher demands of College and Career Ready Standards (CCRS), a subset of state standards recognized by the Office of Career, Technical and Adult Education (OCTAE).

CCRS offer a common, consistent, and clear understanding of what students are expected to learn. Designed to be robust and relevant to real—world expectations, the CCRS reflect and afford adult students the foundational knowledge, skills, and abilities (which have evolved substantially over the last decade) to pursue postsecondary education and training, as well as career aspirations.

*English Language Learner is an eligible individual who has limited ability in reading, writing, speaking, or comprehending the English language and (1) whose native language is a language other than English; or (2) who lives in a family or community environment where a language other than English is the dominant language.

KYAE's standards—based instruction and integration of digital literacy align with the content and format of the fifth edition of the GED test used to award Kentucky's High School Equivalency Diploma. Together, these provide KYAE's students the same opportunities for college and career readiness as graduating high school seniors.

Consequently, KYAE is part of an effort to create a seamless system for students to move from adult education to earning their high school equivalency diplomas and transitioning to postsecondary education and training and/or living wage jobs, ultimately contributing to the economic vitality of the Commonwealth.

To ensure successful instructional effectiveness, KYAE employs comprehensive and intense professional development (PD) (providing offerings required by policy, as well as elective options for professional growth) that encapsulates standards—based andragogy, academic content, contextualization of instruction, digital literacy integration (e.g., Kentucky Educational Television's Fast Forward), effective instructional strategies, and instructional leadership. KYAE PD offerings are available via face—to—face, online, and blended formats.

Additionally, KYAE has forged PD partnerships with: the Collaborative Center for Literacy Development (CCLD) at the University of Kentucky (UK) to provide reading and English Language Arts (ELA) PD, including essential components of reading instruction; the Adult Education Academy at Morehead State University to provide instructional leadership PD and facilitate online programming; and the National Center for Families Learning (NCFL) to provide curricula development and facilitation of online courses, including English Language Acquisition (ELA).

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.

(b) Local Activities. Modification requests: “The Commonwealth did not describe ‘how’ it will use the 13 considerations in section 231(e) of WIOA in making funding decisions consistent with Title II of WIOA. The Commonwealth did not identify what activities would be provided concurrently with other activities, if any. The list of local activities is inaccurate in that ‘career pathways’ is not itself a local AEFLA activity consistent with the definition of ‘adult education and literacy activities’ in section 203(2) of WIOA.”

NOTE TO REVIEW: THE LANGUAGE DIRECTLY BELOW WAS INCLUDED UNDER JOINT SECTION III(B)5.B.(I). AEFLA MODIFICATIONS REFERENCE THIS LANGUAGE. THEREFORE, TO FACILITATE THE PROCESS OF REVIEWING AND APPROVING MODIFICATIONS, THE JOINT LANGUAGE WAS PLACED HERE TO MAKE REFERENCING IT EASIER. BOTH THE 13 CONSIDERATIONS AND FUNDING DECISIONS ARE INCLUDED IN THIS MODIFICATION.

Competitive process [added under joint section III(b)5.B.(i)]: During grant year 2016-17, KYAE will implement a new competitive application process for all federal AEFLA funding that will determine the eligible providers that will be awarded funds starting July 1, 2017. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate applicants’ ability to produce measurable skill gains and other defined metrics. Through this process, KYAE will identify, assess, and award multi-year grants (four-year awards) to eligible providers throughout the State. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals. Eligible grant awardees may include: institutions of higher education; public or private nonprofit agencies; libraries; local educational agencies, including educational cooperatives; community-based organizations; public housing authorities; nonprofit institutions, not aforementioned; consortia or coalitions of agencies described above; or partnerships between an entity(ies) described above and an employer(s). Funding will be distributed based on population needs and performance.

Direct and equitable access [added under joint section III(b)5.B.(ii)]: All KYAE RFPs for grant/contract awards will be competed (as described above) and adhere to direct and equitable provisions to award

funds under WIOA sections 225 (Corrections Education), 231 (Grants and Contracts for Eligible Providers), and 243 (Integrated English Literacy and Civics Education). All RFPs issued under AEFLA will prescribe to the competitive process outlined above. Applications will be evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement and application and application review processes will be in effect for all applicants; all applicants will be treated the same manner. The application process will be designed so that direct application to the State eligible agency is clearly evident, customary, and non-negotiable. Grants will be awarded directly to eligible and approved service providers and not through third-party agreements. **[See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.]**

NOTE TO REVIEW: "CAREER PATHWAYS" MODIFICATION REQUEST: IN ORDER TO PROVIDE CONTEXT, THE BELOW DESCRIBES ALL THREE WIOA COMPONENTS RELATING TO SPECIFIC WORKFORCE ACTIVITIES AND STRATEGIES, INCLUDING WORKFORCE PREPARATION, INTEGRATED EDUCATION AND TRAINING (IET), AND AE'S ROLE IN CAREER PATHWAYS.

Workforce Preparation: KYAE will continue to require standards-based, academic instruction, to be contextualized, at a minimum, by using its Employability Standards. By strengthening contextualized instruction with online curricula courseware [Worldwide Interactive Network's (WIN)], purchased by KYAE's and DWI's Workforce Investment Act incentive funds, students, while in a program of study, may earn a governor-endorsed, Kentucky Essential Skills (KESC). The KESC is achieved through formative and summative assessments and accompanied by an Employability Standards checklist of "demonstrable skills," which the instructor and student will authenticate by signing the document. Consequently, with all programs contextualizing standards-based, academic instruction, they need only to add training partner activities to extend their efforts to implement Integrated Education and Training models and/or provide adult education support within more expansive career pathways programs. Additionally, the state benefits further from the WIN courseware in that one of its educational tracks prepares students to take the WorkKeys tests to earn a National Career Readiness Certificate and another track focuses on College and Career Readiness standards instruction.

Integrated Education and Training (IET): While KYAE is committed with its partners (KCTCS and DWI) to continue to improve and scale up its career pathways program, Accelerating Opportunity Kentucky, it also has explored ways in which less resource-rich areas might partner with organizations in addition to community and technical colleges (e.g., public and private universities, employers, etc.) to offer core adult education services concurrently with occupational training [provided by the aforementioned partner(s)]. While these services may not include all the wraparound support services as a fully articulated career pathways program, defined in WIOA Section 3 (Def. 7), it will provide an opportunity for adult education programs to partner with training organizations to accelerate student learning by attaining adult education support and occupational skills simultaneously.

Therefore, KYAE has piloted an IET model with local adult education programs working in tandem with a healthcare-sector, occupational association. The adult education programs provided workforce preparation, as described above, and collaborated with the association to identify and develop lesson plans/units, leading to options for healthcare-sector-contextualized programming. KYAE continues to explore options with a local adult education grantee (responsible for multiple county programs) that has forged a relationship with a local manufacturing employer. As a result of this pilot, additional, contextualized lesson plans/units will be developed for the manufacturing sector and available in a shared (statewide) lesson bank.

These experiences will generate best practices, challenges, and recommended modifications to help guide programs who are interested in working collaboratively to provide adult-education- contextualized, standards-based academic instructional support and occupational skills through appropriate training partners.

KYAE will continue to strengthen its partnerships with the DWI's Office of Employment and Training (governs local Career Centers) and KCTCS to extend career pathway strategic opportunities across county lines. While Kentucky tends to be "county-centric," KYAE and its partners have made modifications (including performance incentives) to its CPWs framework to create a mutually beneficial situation for all county partner programs.

As a result, students can receive essential-skills (workforce preparation)-contextualized, standards-based, academic instruction at their local adult education program and concurrently enroll in a career pathway technical course(s) in an in-demand industry sector at a community and technical college that may be located outside their local community/county.

The partners have also determined that the model is greatly enhanced by dedicated coaches who assist students with navigating the postsecondary education system and connecting them to one-stops for workplace activities and job placement.

Initially submitted state plan language:

KYAE will conduct a competitive Request for Proposal (RFP) process for eligible entities to apply for grant awards of adult education funds (both state and federal); these entities will subsequently be awarded multi-year contracts to provide educational services. Eligible providers must provide evidence of demonstrated effectiveness based on criteria present in the RFP. Eligible providers of adult education and literacy activities may include:

- Local educational agency;
- Community-based or faith-based organization;
- Volunteer literacy organization;
- Institution of higher education;
- Public or private nonprofit agency;
- Library;
- Public housing authority;
- Nonprofit institution (not described above) possessing the ability to provide adult education and literacy activities;
- Consortium or coalition of agencies, organizations, institutions, libraries, or authorities (as described above); or
- Partnerships between an employer and an entity described above.

KYAE will ensure, through the application process and public announcements, that all eligible providers have direct and equitable access to apply and compete for these grant awards.

Metropolitan and regional papers will be used statewide to advertise the RFPs. A minimum of one bidders' conference will be hosted for potential applicants to answer questions and clarify criteria contained within the standard RFP.

The RFP will underscore criteria for individual eligibility of adult education services, which include:

- Have attained 16 years of age;
- Are not enrolled or required to be enrolled in secondary school under state law (which is 18 years of age in Kentucky); and

- Who are:

- o Basic-skills-deficient;

- o Lacking a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education; or

- o An English Language Learner (ELL).

Therefore and hereafter, adult education and literacy activities are defined as programs, activities, and services offered by eligible providers that include:

- **Adult education:**

- o 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: attaining a secondary school diploma or its recognized equivalent; transitioning to postsecondary education and training; and obtaining employment

- **Literacy:**

- o Ability to read, write, and speak English, compute, and solve problems at levels of proficiency necessary to function on the job, in the family, and in society

- **English Language Acquisition:**

- o A program of study designed to help eligible individuals who are ELL achieve competency in reading, writing, speaking, and comprehension of the English language, leading to: attaining a secondary school diploma or its equivalent; transitioning to postsecondary education and training; and/or obtaining employment

- **Integrated English literacy and civics education (IEL/C):**

- o Services for ELLs that include literacy and ELA, as well as instruction on the rights and responsibilities of citizenship and civic participation; may include workforce training, enabling competency in the English language; and acquisition of basic and advanced skills to function effectively as parents, workers, and citizens

- **Workplace adult education and literacy activities:**

- o Services, defined above, offered in collaboration with an employer or employer organization at a workplace or an offsite location designed to improve incumbent worker productivity

Since the downturn in the economy in 2008, adult education delivered in the workplace (employers' work site/incumbent workers) has been minimal. The Kentucky Skills Network is a unique partnership between the Cabinet for Economic Development (KYCED), Education and Workforce Development Cabinet (KEWC), Labor Cabinet (KLC), and Kentucky Community and Technical College System (KCTCS), dedicated to assessing employer skill needs and designing and delivering the best workforce solutions. Local KYAE programs are available to provide services to eligible individuals needing fundamental academic skills support.

- **Family literacy:**

- o Activities of sufficient intensity and quality to make sustainable improvements in the economic prospects for a family and better enable parents or family members to support their children's learning needs; must 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; and
- *An age-appropriate education to prepare children for success in school and life experiences

Special rule: Grant funds may not be used 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, with the exception of family literacy.

In providing family literacy activities, 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 other than activities for eligible individuals. (This caveat will be included in the RFP application.)

Eligible providers, subsequent to a local needs assessment, will be expected to offer a minimum of comprehensive services, including adult education and literacy and workforce preparation activities. Expectations of services including English language acquisition, integrated English literacy and civics, and family literacy will depend upon the providers' service area population of ELLs, community partnerships, and demand for family literacy.

Under WIOA, adult education and literacy services will align with and be integrated in a seamless workforce development system of complementary services. The Act particularly focuses on a renewed engagement of adult education and literacy providers, employers, and occupational trainers to assist adults in becoming literate and obtaining the knowledge and skills essential for employment and self-sufficiency.

Therefore, adult education and literacy providers will need to effectively demonstrate their ability to provide integrated education and training or adult education and literacy activities provided concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.

Workforce Preparation

KYAE has recently completed hosting train-the-trainer events and has provided an online curricular resource to all programs in order to enhance their contextualized workforce preparation services.

The initiative initially started with an employability skills pilot in which participating program staff were trained to contextualize standards-based, academic instruction with employability skills that had been vetted through focus groups, including an employer focus group.

The recently introduced online curricular resource represents a partnership investment by KYAE and DWI of WIA Workforce Incentive Funds, renewing a contract for Worldwide Interactive Network's (WIN) online curricula courseware. The product not only provides WorkKeys/NCRC preparation, but "soft" skills (essential) and CCRS-based curricula tracks. Along with the administration of badge-supported curricula and assessments, the essential skills track concludes with a Kentucky Essential Skills Certificate (KESC). Additionally, this online courseware is available to other state agencies with the exception of K-12 - where school districts may avail themselves to alternate courseware licenses.

As a result of the pilot, Kentucky Employability Standards were developed by streamlining the initial set of skills and sub-skills that reflected a variety of employment readiness frameworks and were categorized as 21st Century skills of communication, collaboration, and critical-thinking. A lesson repository was established, housing contextualized lesson plans. There are plans to use Carl D. Perkins leadership funds to

assist in creating a user-friendly, web-based platform. Perkins funds also contributed to funding the pilot, which included a six-month ramp-up period for programs to sufficiently prepare to execute pilot activities and KYAE to conduct an independent party evaluation.

The KESC was designed to enrich essential-skills-contextualized, standards-based instruction, but it also meets the needs of students, allowing them to celebrate a milestone and earn a stackable credential on their way to pursuing a National Career Readiness Certificate (NCRC) and/or high school equivalency diploma. Therefore, currently, programs are equipped to provide workforce preparation activities; and the RFP will expect applicants to express demonstrated effectiveness in providing workforce preparation activities.

Integrated Education and Training (IET)

Kentucky partners KYAE, KCTCS and the Department for Workforce Investment's Office of Employment and Training (OET), have initiated and nurtured, through an initial three-year grant from Jobs for the Future (JFF), an IET model that has gone several steps further to institutionalize a (CPWs) framework, Accelerating Opportunity (AOKY), which encompasses:

- Determining career pathways, representing viable sector, in-demand, living wage jobs using labor market information (LMI), and aligning with local and regional industry and economic development needs;
- Engaging local sector employers at the front-end of CPWs development; e.g., expression of available and prospective jobs, curricular development input, and recognition of skill advancement through providing students workplace activities and job placement;
- Preparing students through concurrent postsecondary and adult education services; in the context of workforce preparation activities and training for specific occupations or occupational clusters;
- Supplying intensive, comprehensive wraparound services to help students navigate through achieving their education and career goals; e.g., career exploration and planning, referrals to appropriate social agencies, etc.;
- Employing team teaching (adult education instructor and technical faculty) in conjunction with supplemental college- and career-ready, contextualized adult instruction to accelerate the progression of achievement;
- Enabling students to earn a high school equivalency diploma and at least one recognized postsecondary credential during the same timeframe; and
- Providing workforce activities (e.g., internships, job shadowing) and job placement services for successfully completing students.

Furthermore, through KYAE's work with Judith Alamprese and Associates and the Moving Pathways Forward technical assistance grant, KYAE is currently pursuing additional partners to expand opportunities for adult education programs located in areas where diverse community and technical college pathways options are limited in order to leverage current occupational training.

Therefore, KYAE wants to grow and expand the concept of IET in Kentucky beyond AOKY (a more robust IET example) to include prospective collaborations with employers, pre-apprenticeship programs, public and private four-year universities, etc., to support the occupational training element of an IET model by offering a variety of ways students can accelerate their educational and career accomplishments.

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.

(c) Correction Education and Other Education of Institutionalized Individuals: Modification request: “The Commonwealth provided a response to this element; however, the Commonwealth did not describe how the grants and contracts awarded with Section 225 funds will be competed and will comply with the requirements of Subpart C in Title II of WIOA. The Commonwealth did not describe how it will carry out workforce preparation and transition coaching activities in a way that is consistent with the statute.”

NOTE TO REVIEW: THE LANGUAGE DIRECTLY BELOW WAS INCLUDED UNDER JOINT SECTION III(B)5.B.(I). AEFLA MODIFICATIONS REFERENCE THIS LANGUAGE. THEREFORE, TO FACILITATE THE PROCESS OF REVIEWING AND APPROVING MODIFICATIONS, THE JOINT LANGUAGE WAS PLACED HERE TO MAKE REFERENCING IT EASIER. BOTH THE 13 CONSIDERATIONS AND FUNDING DECISIONS ARE INCLUDED IN THIS MODIFICATION.

Competitive process [added under joint section III(b)5.B.(i)]: During grant year 2016-17, KYAE will implement a new competitive application process for all federal AEFLA funding that will determine the eligible providers that will be awarded funds starting July 1, 2017. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate applicants’ ability to produce measurable skill gains and other defined metrics. Through this process, KYAE will identify, assess, and award multi-year grants (four-year awards) to eligible providers throughout the State. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals. Eligible grant awardees may include: institutions of higher education; public or private nonprofit agencies; libraries; local educational agencies, including educational cooperatives; community-based organizations; public housing authorities; nonprofit institutions, not aforementioned; consortia or coalitions of agencies described above; or partnerships between an entity(ies) described above and an employer(s). Funding will be distributed based on population needs and performance.

Direct and equitable access [added under joint section III(b)5.B.(ii)]:All KYAE RFPs for grant/contract awards will be competed (as described above) and adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections Education), 231 (Grants and Contracts for Eligible Providers), and 243 (Integrated English Literacy and Civics Education). All RFPs issued under AEFLA will prescribe to the competitive process outlined above. Applications will be evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement and application and application review processes will be in effect for all applicants; all applicants will be treated the same manner. The application process will be designed so that direct application to the State eligible agency is clearly evident, customary, and non-negotiable. Grants will be awarded directly to eligible and approved service providers and not through third-party agreements. **[See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.]**

Note to Reviewer: Please find below additional language to clarify/modify an understanding of KYAE's intended services for incarcerated adults.

KYAE will adhere to the same competitive process, including assurances of direct and equity access, mentioned above [(b) Local Activities], when competing 225 funds for correctional and other institutional contextualized (workforce preparation), standards-based academic instruction. **(See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.)**

As part of the grant application, eligible providers will describe and define the adult education academic activities that they will provide through contextualized (workforce preparation skills), standards-based academic instruction and employability/essential skills integration to support incarcerated adults' transitions upon release. Priorities for the Commonwealth will focus on increasing the number of incarcerated adults earning a GED® diploma and securing skills to assist in transition from incarceration to additional education and training and/or employment.

In local areas where full-service jails exist, adult education programs will be expected to partner with their jailer to offer incarcerated adults, at least 10 hours of contextualized (workforce preparations skills), standards-based academic instruction (discretion is given to the adult education program to determine if less than 10 hours of instruction per week is sufficient time to advance students). It is also expected that jailers provide adequate space in a comfortable environment with student access to instructional materials to encourage additional study outside of the classroom setting.

Local providers will also be expected to provide preparation, in a program of study, for WorkKeys assessments associated with earning the National Career Readiness Certificate. The Department of Corrections (DOC) has agreed to provide "good time" for incarcerated adults that earn their NCRC.

While KYAE understands the value of other services, including integrated education and training, career pathways, concurrent enrollment, and peer tutoring, KYAE services will focus on adult education and literacy activities and preparing incarcerated adults for transitioning with employability/essential skills and an NCRC. However, KYAE has strengthened its relationship with DOC resulting in the extension of educational opportunities, including NCRC preparation and together they will continue to look for ways to collaborate in offering critical educational services and support to incarcerated adults.

In agreement with Department of Corrections, incarcerated adults who are likely to leave a correctional institution within five years of participation in the adult education program and/or who are seeking a GED® diploma in the program shall be given priority of services.

Initially submitted state plan language:

- 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 a reducing recidivism goal.

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

KYAE will employ approaches to inmate educational services to participating inmates that will increase educational levels and equip them with skills to become self-sufficient in an effort to reduce the recidivism rate. Using a two-pronged approach to corrections education, inmates are served both in adult state correctional and local correctional facilities. While KCTCS college faculty typically teach daytime classes for adult correctional inmates, adult education programs partner with these adult facilities to provide evening classes and local jail education services. Correctional adult education students must meet the same eligibility criteria as any other adult student as described above.

Local Corrections Education

KYAE program providers with full-service local jails are required (through RFP expectations and contracts) to provide adult education based on an agreement with the local jailer. The new RFP and contractual agreement process will include a continuation of formula funding based on recommendations from an adult educators' performance model work group on adults without a high school diploma or its equivalent. Priority will be given to state inmates housed in local jails and criminal offenders expected to depart within five years' time.

State Correctional Institutions

KYAE contracts with the Kentucky Department of Corrections (DOC) to help build capacity in serving more inmates in 12 facilities statewide. As part of the contracting process, goals are set reflecting increasing academic gains and high school equivalency attainment. KYAE has worked closely with DOC to alleviate "technical issues" for providing GED testing. DOC decided that each facility would be its own testing site and therefore, both the GED Ready test and GED test are administered within the facility itself.

With the reauthorization of WIOA, the RFP process will include the expectation that the following services are made accessible to inmates based on need and situational feasibility.

These services include:

- Adult education and literacy activities (as defined above), including preparation for earning a high school equivalency diploma;
- Appropriate accommodations for inmates identified with learning differences/disabilities;
- Workforce preparation activities as defined above; and
- Transition coaching and CCR-standards-based instruction.

Most adult correctional facilities provide opportunities for vocational education. However, DOC policies require inmates to possess a high school diploma or its equivalent to qualify. Therefore, KYAE will continue

to pursue discussions about possible changes to the policy to enable concurrent enrollment, integrated education and training, and career pathways to accelerate inmate progression through educational and occupational training achievements to better prepare them for release and ability to contribute to society. Additionally, where situationally feasible, instruction may include peer tutoring.

Not less than 82.5 percent of grant funds will be contractually awarded under section 231 to execute section 225, Programs of Corrections Education and Other Institutional Individuals, of which not more than 20 percent of such amount shall be available to execute section 225. Funds may also be used to serve eligible adults in reformatories, work farms, detention centers, or halfway houses.

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.

(d) 1. Integrated English Literacy and Civics Education Program (IELC): Modification request: “The plan does not adequately describe how the Commonwealth will establish IELC programs that provide educational services consisting of literacy and English language acquisition integrated with civics education that includes instruction on the rights and responsibilities of citizenship and civic participation.”

NOTE TO REVIEW: THE LANGUAGE DIRECTLY BELOW WAS INCLUDED UNDER JOINT SECTION III(B)5.B.(I). AEFLA MODIFICATIONS REFERENCE THIS LANGUAGE. THEREFORE, TO FACILITATE THE PROCESS OF REVIEWING AND APPROVING MODIFICATIONS, THE JOINT LANGUAGE WAS PLACED HERE TO MAKE REFERENCING IT EASIER. BOTH THE 13 CONSIDERATIONS AND FUNDING DECISIONS ARE INCLUDED IN THIS MODIFICATION.

Competitive process [added under joint section III(b)5.B.(i)]: During grant year 2016-17, KYAE will implement a new competitive application process for all federal AEFLA funding that will determine the eligible providers that will be awarded funds starting July 1, 2017. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate applicants’ ability to produce measurable skill gains and other defined metrics. Through this process, KYAE will identify, assess, and award multi-year grants (four-year awards) to eligible providers throughout the State. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals. Eligible grant awardees may include: institutions of higher education; public or private nonprofit agencies; libraries; local educational agencies, including educational cooperatives; community-based organizations; public housing authorities; nonprofit institutions, not aforementioned; consortia or coalitions of agencies described above; or partnerships between an entity(ies) described above and an employer(s). Funding will be distributed based on population needs and performance.

Direct and equitable access [added under joint section III(b)5.B.(ii)]:All KYAE RFPs for grant/contract awards will be competed (as described above) and adhere to direct and equitable provisions to award funds under WIOA sections 225 (Corrections Education), 231 (Grants and Contracts for Eligible Providers), and 243 (Integrated English Literacy and Civics Education). All RFPs issued under AEFLA will prescribe to the competitive process outlined above. Applications will be evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement and application and application review processes will be in effect for all applicants; all applicants will be treated the same manner. The application process will be designed so that direct application to the State eligible agency is clearly evident, customary, and non-negotiable. Grants will be awarded directly to eligible and approved service providers and not

through third-party agreements. [See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.]

Note to Review: Integrating rights and responsibilities of citizenship and civic participation modification request: Priorities for the Commonwealth will focus on increasing ELLs' abilities to read, write, speak, and comprehend English, in addition to building mathematical skills through 231 funding. Academic instruction will be supported by adult education College and Career Readiness standards in an effort to retain and transition ELL students into adult education.

Programs' short-term, educational goals for ELLs will promote the same experience of essential/employability-skills-contextualized, standards-based academic instruction as adult education students, while integrating instruction on rights and responsibilities of citizenship and civic participation. ELLs' retention and transition to adult education will be facilitated by these instructional enhancements, whereby advancing into adult education instruction will appear seamless to the student.

As ELLs anticipate transitioning to adult basic education will then set longer-term goals of earning a GED® diploma and transition to postsecondary education and training or employment. As ELLs progress, they will have the same opportunities to participate in integrated education and training initiatives and career pathways, as the program works with partners to incorporate work-related activities and fulfill job placements.

Initially submitted state plan language:

With the introduction of a new component to IEL/C, "integration," KYAE plans to improve integration of English literacy and civics education into the comprehensive menu of services programs offer, provided their population needs are met. Adult English language learners, including individuals who may have earned degrees in other countries, may receive services that enable them to achieve competency in English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens. This includes English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation; it may also include workforce training.

During program year 2015-16, KYAE required programs applying for and implementing EL/C programs to establish a work-related goal in a first foray into connecting ELL immigrants admitted for permanent residence with work, including "unsubsidized employment in in-demand industries and occupations," workforce preparation activities, etc. Subsequently, the RFP application process will include, at a minimum, that programs: integrate students into workforce preparation activities, as defined by implementing standards-based instruction contextualized using KYAE's Employability Standards; participate in integrated education and training models; and provide assurance of partnerships with local Workforce Innovation Boards (LWIB) and Kentucky Career Centers, in particular, to provide the same opportunities for career exploration and counseling, work-related activities, and job placement.

Additionally, program year 2015-16 performance targets included NCRC awards, for which an expectation would be established for IEL/C programs to pursue as well. The KESC will also be added to performance expectations for the next program year. Programs have integrated digital literacy in program services and some IEL/C students may be interested in AOKY technical pathways as well.

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.

Initially submitted state plan language:

Based on the funding allocation (65 percent) calculated using the state's share of a 10-year average of data of the Office of Immigration Statistics of the Department of Homeland Security for immigrants admitted for legal permanent residence for the 10 most recent years, and the other 35 percent taking into consideration our State's growth by the average of the three most recent years reported by the same data source, a minimum of \$60,000 will be dedicated to Integrated English Literacy and Civics (IEL/C).

Funds will be distributed based on a competitive and direct and equitable RFP process with requests for demonstrated effectiveness and justification of a target population.

(d)2. Integrated English Literacy and Civics Education Program (IELC): Modification request: "The plan does not indicate how the grants and contracts with section 243 funds will be competed and will comply with the requirements of Subpart C in Title II of WIOA. The plan does not address the activities that will be funded with section 243 funds."

KYAE will adhere to the same competitive process, including assurances of direct and equity access, mentioned above [(b) Local Activities], when competing 243 funds for integrated English Literacy and Civics programs. The competitive process and direct and equitable access will remain the same for all funding sources, including 243 funds and will comply with the requirements of Subpart C in (See also III(b)5.B.i and III(b)5.B.ii - Distribution of Funds for Core Programs, Title II.)

KYAE plans to compete the IELC 243 funding separately from 231 funding because of the significant change to the historical EL/C model. This will provide areas statewide (not limited to providers have been awarded 231 funding), particularly with larger ELL populations, to apply to offer programming designed to conclude with placement in unsubsidized employment. Additionally, KYAE expects to provide training and technical assistance to ensure the enhanced IECL model is successfully implemented.

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.

***Alignment of WIOA partners:** Kentucky is planning with its WIOA and other service partners to submit a combined plan of action.*

KYAE, OET and KCTCS continue to sustain AOKY that was initially funded with a grant from JFF. The partners have worked to hone the model to a framework of which all 16 community and technical colleges and adult education centers and KCC offices can offer. The partners continue to provide training and technical assistance (e.g., team teaching) in an effort to promote continuous improvement. (See also Integrated Education and Training.)

KYAE is also working with WIOA partners to implement team—based case management (TBCM) to set standards for establishing a system of collaborative case management among KCC partners. TBCM builds on the functional alignment within KCC and focuses on providing services to job seekers in a consistent, coordinated and efficient way. The systems and tools used in the TBCM approach reinforce functional alignment and integrated service delivery within the centers and among partners.

KYAE is also directly involved with two Supplemental Nutrition Assistance Program (SNAP) grant initiatives with Department for Community—Based Services (DCBS). Paths to Promise (P2P) focuses efforts on a research pilot in eight counties in Eastern Kentucky that includes moving eligible students into AOKY pathways. The other Employment and Training funds proposal includes support services for students pursuing education and training in urban areas.

High quality professional development: Standards—based instruction: One of our professional development contractors, the University of Kentucky's Collaborative Center for Literacy Development (CCLD), conducted research (completed August 2014) on our implementation of Standards—in—Action's (SIA) Unit Four instructional observations and KYAE used the aggregated data trends to inform current and future professional development offerings.

During 2015—16, KYAE revised the SIA Innovations 4 classroom observation tool to include more examples of evidence and to reflect the Teaching Effectiveness Teacher Competencies. The state's program directors will be trained on using the tool in February 2016, then will conduct classroom observation in the spring of 2016, and provide their findings to KYAE. KYAE has contracted with the CCLD to develop data collection tools and present conclusions based on the data analysis. This will be used by KYAE to inform future PD and technical assistance for local programs.

In March 2015, Kentucky's state team, along with the teams from 11 other states, convened in Washington, D.C., for the first of two national workshops. These workshops aimed to "delve into the instructional and institutional implications of CCRS and help to shape the approach that teachers and program leaders should take." In the March workshop, the team learned to evaluate instructional resources by determining their alignment to the key advances in the CCRS. Core instructional actions to effectively implement the CCRS key advances in adult education classrooms were presented as the second part of the initial workshop. Two national coaches were assigned to the Kentucky team to assist in planning for a pilot implementation of these activities with 12 instructors from participating programs. Workshops for evaluating and aligning both mathematics and English/language arts resources were completed for a total of 48 instructors. The pilot continues into FY2015—16 with the impact of the activities being evaluated and feedback given to the program directors in response to submitted assignments. The purpose of the pilot is to determine which activities and tools from the workshops will be incorporated into future PD.

KYAE recognizes the critical need for aligning adult education curricula to meet the higher demands of the CCRS sanctioned by the Office of Career, Technical, and Adult Education, U.S. Department of Education. It is also crucial that these curricula be aligned to a more relevant GED test and representative of current expectations of college— and career—ready graduating seniors. CCRS provide a consistent, clear understanding of what students are expected to learn. The standards are designed to be robust and relevant to the real world, reflecting the knowledge, skills and abilities needed for continued success. KYAE is part of an effort to create a seamless system for students to move from adult education to earning stackable credentials, including the KESC, NCRC and a high school equivalency diploma. With students fully prepared, Kentucky will be positioned to compete successfully in the global culture and economy.

Technical assistance: The PD model this year focused on instruction, with an emphasis of putting together what has been learned over three years of SIA, to provide the student with a seamless learning experience from diagnostic activities to achievement of goals, including high school equivalency preparation. We are eager to elevate what might have, at one point, appeared to be siloed concepts to unified practical application. Additionally, mathematics, GED preparation, instructional technology, and employment of effective instructional strategies that address ELA shifts and mathematical practices (including differentiated instruction) have been ongoing focus for PD (selection based upon survey results from the field.)

KYAE plans to: streamline required PD; integrate and balance face—to—face and online PD opportunities so program staff may remain in programs and still actively participate in PD and network with peers via technology (e.g., Edmodo, Google Hangouts); and offer elective professional growth opportunities (PGOs) in which staff have expressed interest based on their personal and programs' needs. We envision an overarching umbrella of required PD, followed by program directors' and staffs' thoughtful consideration of what PD they need programmatically and

individually. Therefore, more time will be available for selecting and participating in appropriate PGOs and program directors will be charged with strategically scheduling study circles and lesson collaboratives that advance student—centered services. Some of this year’s PD (e.g., study circles) will also help inform future PD. PD partners and coaches will be available for technical assistance program visits.

Role of the eligible providers as a one—stop partner access to employment, education and training: KYAE and the Education and Workforce Development Cabinet are collaborating in the development of the Focus Explorer/Burning Glass web—based application in order to further align Kentucky’s workforce development system (including KCC) with Kentucky’s educational objectives while improving services to provide an online career counseling tool. KYAE’s and KCC’s students/clients, as well as the population—at—large, will, based on personalized skills gap analysis and career advancement plans, be directly referred to WIOA—approved eligible training providers, including adult education programs. KYAE, in conjunction with its partners, will provide technical assistance and training to local providers in order to first pilot the resource and then roll it out statewide. See also Workforce Preparation about KESC and online curriculum. KYAE has also developed units of instruction to assist instructors in helping students use a career and skills exploration software, FOCUS CAREER.

Assistance in the use of technology: KYAE administered a comprehensive technology self—assessment to programs. The self—assessment will provide programs with a good understanding their current level of technological proficiency, both for the use of technology with students and their staffs’ competencies. Subsequently, each program will submit a plan for the next three years outlining efforts for continuous improvement, detailing steps to progress toward the next category of proficiency.

If the program has already achieved the highest level of competency, it will be asked to provide a plan outlining continued efforts to improvement. KYAE will contract through a professional development partner, for the services of an Instructional Technologist who will be responsible for providing technical assistance throughout this planning and implementation process, as well as a plethora of other ways in which s/he will provide technical assistance in using technology to increase efficiencies and as an instructional tool.

KYAE is also working with Kentucky Educational Television on a distance learning pilot to facilitate students’ completion of Fast Forward modules in preparation for the GED® test. These students tend to prefer using online curriculum at a distance due to conflicts with work, childcare, transportation, etc., that may prevent them from visiting the adult education center on a regular basis.

Monitoring and evaluation: See Monitoring and Evaluation below (F).

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

Developing content and models for integrated education and training and career pathways: See Integrated Education and Training.

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.

Professional Development Quality Assessment

KYAE continues to use the Kirkpatrick's Four—Level Evaluation Model to inform professional development. As part of their professional development contracts, the KYAE PD contractors track and report items 1—3 below. Item 4 is collected through the Kentucky Adult Education Reporting System (KAERS). The data is collected via the following activities:

- 1. Questionnaires at the conclusion of a training to survey immediate feedback from training recipients;*
- 2. Pre— and post—tests at trainings to measure what learning objectives were achieved and whether additional training is needed;*
- 3. Observation of demonstrated, on—the—job execution of expected behaviors via a well—informed program director's supervision to reinforce the replacement of old knowledge/processes with the new information/processes provided by the training; and*
- 4. Collection of student data to determine if the training impacted student outcomes.*

KYAE has implemented SIA instructor observations and has, over time, gathered feedback and input to modify and refine the observation tools and process.

Monitoring and Evaluation

KYAE built KAERS, a robust, recently enhanced data collection system. KYAE is continuously seeking new ways to analyze and draw conclusions from the data. KYAE expects it will be a larger portion of how to monitor and evaluate program services, professional development, instructional strategies, program efficiencies, etc.

KYAE is strongly committed to helping ensure local program success in producing quality student outcomes based on core indicators of performance. KYAE staff will be monitoring, evaluating, assisting in continuous improvement activities, sharing resources, and providing technical assistance in a myriad of ways, both directly and indirectly. Presented below are some of KYAE's major monitoring, evaluation, and program support components.

- KYAE's program support team members act as liaisons between KYAE and local programs. KYAE provides information on state and federal policy and procedures; monitors and evaluates program performance, and assists in data—informed analysis and program plans for development; provides local programs with information on best practices; and promotes efforts to increase the use and understanding of technology.*
- Monitoring activities will continue to take place with particular emphasis on using student data to guide program decisions. KYAE's KAERS system provides a means for real—time monitoring and evaluation based on program and student data and guides KYAE's technical assistance and program support. Regular desk audits will be conducted for each provider using KAERS data and other available information. This action ensures that both KYAE and the local program directors are aware of data related to their programs.*
- Typically, 30 programs are randomly selected for annual audits conducted by the Kentucky Auditor of Public Accounts. The audits consist of both performance and financial reviews and include a review of programs' compliance with KYAE policy. KYAE will continue this practice unless regulatory guidelines dictate differently.*

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.

Investment

Full Name of Authorized Representative: **Reecie D. Stagnolia**

Title of Authorized Representative: **Executive Director, Office of Adult Education**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)

(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to OCTAE_MAT@ed.gov

ASSURANCES

The State Plan must include assurances that:

- 1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding supplement and not supplant provisions). Yes**
- 2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA. Yes**
- 3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not “eligible individuals” within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA. Yes**
- 4. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities; Yes**
- 5. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and Yes**
- 6. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program. Yes**
- 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>.

GEPA section 427—Special Needs/Barriers to participation Kentucky recently completed the RFA process for services under WIOA. As part of that RFA process, each applicant was directed to address the thirteen AFLEA considerations. Consideration number two addresses special needs populations and barriers. KYAE Skills U weighted heavily the responses provided in the considerations in the selection of applicants for service. Applicants addressed how they will serve special needs populations

and students with barriers through ADA compliance, Office of Rehabilitation (OVR) assessment on physical disabilities, assistive technologies and other reasonable accommodations as well as partnerships with state agencies that provide support services to students with barriers or special needs. All programs have been supplied with the Burlington English product as one tool to use with non-English speaking students. In addition, all local programs sign contracts and affidavits that cover Title IX and affirm they will not discriminate on the basis of age, color, race or any protected class under Title VI and VII of the Civil Right Act of 1964, Age discrimination Act of 1975, Americans with Disabilities Act of 1990 and all applicable laws which prohibit discrimination. Programs are continually monitored by state staff of Administration and Accountability and on a rotating basis participate in an agreed upon procedures audit by the State Auditor of Public Accounts as to the terms of the contract. State employees are encouraged to express their concerns regarding existing or potential barriers or prohibitions to equal employment opportunity due to race, color, national origin, sex, age, religion, sexual orientation, gender identity, ancestry, veteran status, and disability in accordance with state and federal laws. EEO assistance is available by contacting the Human Resources EEO Counselor/Coordinator or the State EEO Coordinator.

PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION

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

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

A. INPUT OF STATE REHABILITATION COUNCIL

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

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

The agency's State Rehabilitation Council (SRC) is established under the Kentucky Revised Statutes 163.470 and meets the requirements of 34 CFR 361.29. The SRC is a valued partner with the Office of Vocational Rehabilitation participating in the administration of the Vocational Rehabilitation Program under Title I of the Rehabilitation Act of 1973, as amended. The SRC meets quarterly to review policies, program information, and other pertinent issues.

For the two years joint meetings occurred monthly as well as weekly with leadership from the Education and Workforce Development Cabinet, agency staff and the State Advocacy Organizations. The major work of the group was to create a consistent regional and management unit structure. Additionally, workgroups were formed to work on the consolidation of policies for the provision of vocational rehabilitation services under a combined agency and the redesign of systems and processes to achieve greater efficiency.

On October 1, 2018 Kentucky integrated into a single vocational rehabilitation program the following programs that are operated under the federal Rehabilitation Act of 1973 (29 U.S.C. Sections 720

through 7510): (1) The vocational rehabilitation program for individuals with visual impairments; and (2) the vocational rehabilitation program for individuals with other disabilities.

The Kentucky Office for the Blind and the Office of Vocational Rehabilitation abolished and consolidated their respective State Rehabilitation Councils under the combined agency, the Office of Vocational Rehabilitation into one Council in keeping with the State Rehabilitation Council (SRC) Kentucky Revised Statutes 163.470 assuring it meets the requirements of 34 CFR. 361.29. This required that the agency submit recommendations for appointment for candidates to fill vacant council positions for the newly established council. The recommendations were sent to the Governor's Office for appointment.

In preparation for the merger, in August, the Executive Committee members from both Councils met prior to the merger to discuss the makeup of the council, meeting dates and the revision of the bylaws for the new council. On September 10, 2018 the Office of Vocational Rehabilitation State Council met and extended an invitation to the members of the Office for the Blind to join the meeting. Under the new Council a Blind Services Committee will be established to address specialized services for the blind and visually impaired.

Integration of the Kentucky Office of Vocational Rehabilitation Services and Office for the Blind Services Remaining Action Steps: May 15 — DRAFT reorganization plan submitted to RSA including organizational structure, common order of selection, categories and eligibility. May 15 — October 1 — Agency staff continue work on the consolidation of policies and the redesign of systems and processes. May 28 — June 15 — Ten Public hearings scheduled throughout the state. Content will be the presentation of the organizational plan and structure and Order of Selection. Policies will be posted on the website. June 4 — Draft reorganization plan will be presented to the Office of Vocational Rehabilitation Council. May 15 — Sept. 15 — Ongoing work with Personnel Cabinet: Outline/Reorg worksheet to Personnel cabinet and Governor's office Draft documents — plan, executive and administrative order to Personnel Cabinet for final approval and implementation; Complete all required spreadsheets and checklists. May 15 — Sept. 15 — DWI Division of Fiscal and Budget Integrity: Lay groundwork for and then completes all necessary grant award transfers, federal funding rule and reporting requirements; determine how the appropriation/allotments should be organized and work with Office of State Budget Director analyst to ensure biennial budget requirements are met; and make necessary allotment and state appropriation changes. July 1 — September 30 — submission of the Combined State plan to the Rehabilitation Services Administration on or before the effective date of the organizational change. October 1 - Final orders are signed and reorganization goes into effect.

As a part of the agency's commitment, OVR will provide funding support for the SRC to be used in reimbursement of expenses to council members, publication of the Annual Report and conducting the Consumer Satisfaction Survey through the University of Kentucky. OVR will work with the SRC to make every effort to seek input for needed improvements and recommendations. This will occur through formal and informal communication, as well as the committee work of the members. OVR will work in partnership with the SRC in ensuring that individuals served receive the needed services and supports to gain independence through employment and increased skills acquisition.

This section was the submission of the Office of Vocational Rehabilitation on April 2, 2018 for the required Combined State Plan for Kentucky. (1) Related to input and recommendations from the SRC for the OVR portion of the Combined State Plan

The SRC met on February 22, 2016 and gave input and recommendations in these areas, and the agency responded to the input and recommendations. Responses are listed below: The SRC recommended grammatical changes, as well as format changes in our rough draft. The agency does accept this input and made the changes except for one place where the grammar was corrected

already. The agency rejects changes in the format because we are just putting in the format that we received. The SRC requested that we define FOCUS and Rapid Response in the parts of the plan in which they are referred. The agency does accept this input and will briefly define the suggested items. The SRC requested that we define Section 511 The agency does accept this input and will briefly define this item. The SRC recommended that the agency be more specific when it comes to what other agencies will assist with education on and provision of supported employment services. The agency does accept this input and will add “and other agencies” after the Arc of Kentucky because we need to utilize more resources for education and funding of Supported Employment services, such as the Kentucky Association of Supporting Employment First (KYAPSE), the Department of Behavioral Health and Developmental and Intellectual Disabilities (BHDDID), the Kentucky Rehabilitation Association (KRA), UK Human Development Institute, ECU Center of Excellence, most of the Comprehensive Care Centers in the state, and many Supported Employment providers. The SRC recommended that the agency add measures where the goals are mentioned in two places and not just one. The agency does accept this input and will add the measures to the other section. The SRC recommended that we make some wording changes to the Coordination with Employers section in the first paragraph. The agency does accept these changes and will make them. The SRC recommended that we provide Benefits Planning and Analysis as an option when it comes to addressing health insurance concerns. The agency does accept this input and will add it to the tasks under the goal that deals with ancillary services. The SRC recommended that the agency specify the number of schools we wish to expand the Community Work Transition Program to. The agency does accept this input and agrees that the intent should be to expand the program to all schools. The SRC recommended that the agency offer the Pre—ETS brochure and video for the schools online as well. The agency does accept this input and will offer both items on the agency website as well as in person. The SRC recommended that we give more information concerning online classes at Carl D. Perkins Vocational Training Center (CDPVTTC) used to enhance the vocational behavior enhancement program. The agency accepts this input and will put something in Section P as it pertains to progress on Pre—ETS tasks about the online orientation class for new students. The SRC recommended that the agency provide information and resources for choosing the appropriate college. The agency does accept this input and will offer brochures for Carl D. Perkins Vocational Training Center and any resources available for choosing the appropriate college. The SRC recommended that we add something about transgender and sexual orientation to the question and to the answer concerning outreach procedures concerning minorities. The agency cannot change the question it was given to answer by the federal government but does accept this input and will add to its answer the protected classes, including sexual orientation, gender identity, and genetic information that are also listed on the signature statement of its application for services. The SRC asked if there was collaboration with the school districts to reach all the transition students. The agency does accept this input and will add more information to the update of the goal that relates to the question. SRC Input Related to Consumer Satisfaction As it has in previous years, the SRC conducted a consumer satisfaction survey of individuals whose cases were closed in the previous fiscal year in conjunction with the Human Development Institute at the University of Kentucky. The agency financed the survey efforts and acted as liaison to the Human Development Institute on behalf of the SRC. The SRC approved changing all references to customer in satisfaction survey to consumer. The agency made the changes in the survey.

This section was the submission of the Office of the Blind on April 2, 2018 for the required Combined State Plan for Kentucky.

The agency’s State Rehabilitation Council (SRC) is established under the Kentucky Revised Statutes 163.470 and meets the requirements of 34 CFR 361.29. The SRC is a valued partner with the Office for the Blind (OFB) participating in the administration of the Vocational Rehabilitation Program under Title I of the Rehabilitation Act of 1973, as amended. The SRC meets quarterly to review policies, program information, and other pertinent issues.

At the writing of this plan, Kentucky is on target October 1, 2018, subject to federal approval, to integrate into a single vocational rehabilitation program the following programs that are operated under the federal Rehabilitation Act of 1973 (29 U.S.C. Sections 720 through 7510: (1) The vocational rehabilitation program for individuals with visual impairments; and (2) the vocational rehabilitation program for individuals with other disabilities. The Kentucky Office for the Blind and the Office of Vocational Rehabilitation will consolidate their respective State Rehabilitation Councils under the combined agency into one Council in keeping with the State Rehabilitation Council (SRC) Kentucky Revised Statutes 163.470 assuring it meets the requirements of 34 CFR. 361.29.

As a part of the agency's commitment, OFB provides funding support for the SRC to be used in reimbursement of expenses to council members, publication of the SRC Annual Report and conducting the Consumer Satisfaction Survey through the University of Kentucky. In 2017 \$35,650, was expended for the work of the Council. OFB worked with the SRC to make every effort to seek input for needed improvements and recommendations. This occurred through formal and informal communication, as well as the committee work of the members. OFB works in partnership with the SRC in ensuring that individuals served receive the needed services and supports to gain independence through employment and increased skills acquisition. The State Rehabilitation Council and its subcommittees guide OFB operations. The committees are: Executive, Bylaws and Nominating, Business and Employment Opportunities, Government and Public Relations, Planning, and Consumer Services.

The council normally holds its quarterly meetings in January, April, July and October to coincide with the federal reporting quarters. This ensures that they get the most current reporting information at each meeting. The Bylaws/Nominating Committee submitted recommendations for appointment and reappointment for candidates to fill vacant council positions. The recommendations were sent to the Governor's Office on January 30, 2017 but candidates have not yet been appointed or reappointed.

The State Rehabilitation Council formed a steering committee to work with OFB, OVR and Cabinet Management staff on the upcoming merger of the two agencies. The Steering Committee has met jointly with staff and has been actively involved in the development of the reorganization plan moving forward. The Committee is made up of the Chair of the Council, the past Chair and representatives of each the advocacy organizations in order to have input into any changes affecting services to the blind in the Commonwealth.

Quarterly meetings with a full quorum in attendance were held on October 28, 2016 and January 20, 2017. Due to lack of a member quorum, the April 2017 meeting was cancelled. Although there was still no quorum for the July 2017 meeting, OFB staff gave performance and program operation updates to all attending members. Input was received and recorded in the written minutes of the committee reports, and of the Council. The University of Kentucky Research Program and the Human Development Institute (HDI) conducted the 2016 and 2017 Satisfaction Survey. The executive summary of results and the complete report was distributed to the Council in February of 2018.

Overall, the results of the study indicate that consumers expressed high degrees of satisfaction with their experiences. Over ninety-seven (97.6%) of all participating consumers rated that services they received through the Office for the Blind as a 1 or 2 on a five-point scale where 1 = "excellent" and 5 = "poor". In addition, for those with a case closed successfully, 90.1% indicated that their needs were met through the services received by responding with a 1 or 2. A full presentation of the report will occur in April by the Principal Investigator of the project through HDI at the April 20, 2018. The theme of the 2017 SRC Annual Report of the Council was "Creating Possibilities" and it was distributed to the full Council in January of 2018.

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

2. the Designated State unit's response to the Council's input and recommendations; and

This section was the submission of the Office of Vocational Rehabilitation on April 2, 2018 for the required Combined State Plan for Kentucky.

The SRC reviewed and approved the agency's proposed changes in the On—the—Job Training policy.

The agency issued the updated policy.

The SRC reviewed and approved the agency's proposed changes in the Community—Based Work Transition Program (CWTP) service fee memorandum.

The agency issued the service fee memorandum.

The SRC reviewed and approved the agency's proposed changes in the Presumptive Eligibility policy.

The agency issued the updated policy.

The SRC reviewed and approved the agency's proposed changes in Errors policy with the recommendation that 'best practice' be changed to 'required actions'

The agency issued the updated policy. The policy outlines the steps that should be taken to address these corrections. The Errors section in the Counselor's Policy and Procedure Manual details how to address information that has been written incorrectly in a paper case file, or entered incorrectly into the electronic case management system (CMS), and states that the correction must be made as soon as discovered and outlines the steps that need to be taken to correct any mistake in both the CMS system and paper files.

The SRC reviewed and approved the agency's proposed Pre—Employment Transition Services (Pre—ETS) with some changes, to coincide with recent changes in federal law.

The agency accepted/made the changes and issued the updated policy.

The SRC reviewed and approved the agency's proposed revisions in Supported Employment policy.

The agency issued the updated policy.

The SRC reviewed and approved the agency's proposed changes in the Interpreter Service Fee Memorandum (SFM). The agency issued the updated SFM.

The SRC reviewed and approved the agency's proposed policy to put the Hearing Aid Dispensing Fee under the Cost—Sharing guidelines and approved changes in the Cost Sharing Policy and Forms

The agency issued the updated policy and forms

The SRC reviewed and approved the agency's proposed changes in Homemaker Policy and definitions of Competitive Integrated Employment to comply with recent changes in federal law.

The agency issued the updated policy and definitions.

The SRC reviewed and approved the agency's proposed Benefits Planning Policy.

The agency issued the new policy.

The SRC approved the agency's proposal to change the name of the Community—Based Work Transition Program to the Community Work Transition Program.

The agency changed the name.

SRC Input Related to SRC operations

The Executive Committee thoroughly reviewed the SRC by—laws and recommended several changes to the full Council at the September, 2015, meeting. The full council approved the changes. The code of ethics and conflict of interest forms were signed at the December 2015 meeting.

Agency staff made the changes in the by—laws.

SRC Input Related to the Comprehensive Needs Assessment the SRC approved contracting with the University of Kentucky Masters in Rehabilitation Counseling program to complete the triennial Comprehensive Needs Assessment.

Agency staff entered into the contract.

The SRC approved the Comprehensive Needs Assessment produced by the University of Kentucky Masters in Rehabilitation Counseling program.

Agency staff published the assessment.

SRC Input Related to Quality Expectations Report

The SRC approved the Quality Expectations Report.

Agency staff published the report.

This section was the submission of the Office of the Blind on April 2, 2018 for the required Combined State Plan for Kentucky.

SRC Recommendation 1 - Order of Selection

In FFY 17, agency staff and the SRC reviewed, at each meeting data on numbers served, number placed on a waiting list, and agency fiscal resources to determine the need to open or close categories of service. Based on fiscal resources, it was determined that the agency would continue to serve only Category One.

SRC Recommendation 2 -Annual Report

The agency shared with the SRC, all the information for the Annual Report. It was recommended by the SRC Planning Committee at the October 28, 2016 meeting that the theme of the 2016 Annual Report be “enVISIONing Success” and that there be eight consumer success stories, articles on PATH, Insight and the Kentucky School for the Blind’s Summer Program, in addition to statistics and information from the Consumer Satisfaction Survey. The 2016 Annual Report contained facts that informed the public about OFB and the SRC, such as program statistics, agency budget update, Satisfaction Survey results, consumer success stories, and contact information for the agency. The Annual Report was sent out electronically to all SRC members for their review prior to publication. It was also made available to the public on the OFB website.

SRC Recommendation 3 - Service Fee Memo

At the October 28, 2016 meeting, the Consumer Services Committee discussed Pre-Employment Transition Services and the fees associated with providing these services. They discussed a new Service Fee Memo, which OFB and OVR had worked on jointly. The committee recommended to the entire council that the Memo be accepted. A motion was made, seconded and a vote taken to approve the new Service Fee Memo for Pre-Employment Transition Services.

SRC Input into Consumer Satisfaction Survey

OFB reported its performance on the Common Measures, satisfaction survey, and numbers served, and outcomes for the various programs offered to consumers for 2016, at the January 20, 2017 quarterly meeting. The University of Kentucky Research Program and the Human Development Institute

conducted the 2016 Satisfaction Survey and a representative presented the results of that survey to the SRC at the January meeting. The executive summary of results was sent to all members on December 21, 2016, prior to the meeting. The complete report was sent on January 30, 2017.

It was reported that a total of 163 participants responded which was nearly an 80 percent response rate. Overall, the results of the study indicated that consumers expressed high degrees of satisfaction with their experiences. Over 87 percent of all participating consumers rated services they received through OFB as a 1 or 2, on a five-point scale where 1 = "excellent" and 5 = "poor".

Input was received and recorded in the written minutes of the committee reports, and of the council, that met on October 28, 2016, and January 20, 2017. The Planning Committee discussed possibly adding additional questions concerning Pre-ETS and WIOA to the Satisfaction Survey in the future. As the council has not had enough members to make up a quorum, the committee has been unable to meet since January 2017 to work on additional questions. This will be discussed at the next meeting where a quorum is present.

SRC Input into CSPD

The SRC had the opportunity to review and comment on the development of plans, policies and procedures for CSPD. There were no changes to the current policies and procedures for CSPD. The council was given information at every meeting on personnel and staff changes. OFB notifies council members via email job postings, and when a new employee is hired.

In response to the SRC's Recommendation 1 on maintaining our Order of Selection at Category One, OFB leadership was transparent in communicating the agency's financial status to the Council. Based on a thorough analysis of OFB's budget, the State Rehabilitation Council, along with agency leadership the decision was made that Category One would continue to be the only open category under Order of Selection to be served by OFB. In response to the SRC's Recommendation 2 of the new Service Fee Memo for Pre-ETS, upon approval of the Council, OFB agreed and distributed the revised Service Fee Memo. In response to the SRC's Recommendation 3 on the 2016 Annual Report, OFB accepted the recommendations for content in the annual report. In response to the SRC Planning Committee possibly adding additional questions relating to Pre-ETS and WIOA to the Satisfaction Survey, this was accepted and work will begin on this area through the Planning Committee at the upcoming quarterly meetings.

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

This section was the submission of the Office of Vocational Rehabilitation on April 2, 2018 for the required Combined State Plan for Kentucky.

Related to input and recommendations from the SRC for the OVR portion of the Combined State Plan The SRC recommended that the agency work on pursuing establishment grants to address the lack of coverage of supported employment in certain areas around the state. The agency rejects this input because the establishment grants were designed to address a number of priorities identified through the Comprehensive Needs Assessment of which unserved areas was only one. The establishment grants currently in place address one or more of these priorities. One establishment grant is being used by one agency to expand their services into two counties it was not serving previously. The other grants are expanding services to specific groups of individuals with disabilities identified in the Comprehensive Needs Assessment. The ideology is that this will also lead to more successful outcomes. The main reason why there are not new establishment grants to expand into unserved and underserved areas is that the providers typically cannot provide the required match.

The SRC recommended that the agency add more specific information to other supported employment goals. The agency rejects this input because it feels there is sufficient specificity and more specificity will reduce the agency's ability to respond to needs that may arise during the period of the plan.

The SRC recommended that the agency be more specific about which parts of the state to which it would like to add providers. The agency rejects this input due to the fact that there is not enough funding to add providers to the unserved portions of the state unless some new SCL/Michelle P provide pop up.

The SRC recommended that the agency add more information to the list of Priorities mentioned in the plan. The agency rejects this input because the information is located in other places in the plan, and does not feel more specificity is needed or appropriate in the list of Priorities, which the section under question requests. However, the agency will add a date to one of the Priorities in the list. The agency will also improve the wording on some of the Priorities in the list.

The SRC recommended that the agency put in information from the review of the customer satisfaction surveys into the priorities. The agency rejects this input because it will only be able to get the information from the review. That is the reason we are reviewing them. The SRC recommended that the agency give more information on the common measures in the strategies/tasks. The agency rejects this input because we getting ready to track them in the first year because we are responsible for them. In the interim, the current system is being modified to meet the data collection requirements for common measures as well as the additional data elements required for RSA 911 quarterly reporting. We anticipate that the current system will be able to collect the necessary data beginning 7/1/2016 and produce accurate reports for common measures reporting. Once a baseline is determined and the relationship between services, partnerships, etc. and successful outcomes and measurable progress are analyzed, strategies will be developed to improve the performance outcomes.

The SRC recommended that the agency expand on the barrier related to more transition than adult cases being closed before service provision mentioned in the goals and objectives. The agency rejects this input because it is addressing the barrier as identified in the Statewide Comprehensive Needs Assessment and cannot expand on it until we address it and learn more about it. The SRC recommended that the agency provide more supports for consumers considering college even if they are not in high school. The agency rejects this input because supports are identified in the Individual Plan for Employment to meet the need of the consumer and cannot be listed fully.

The SRC recommended that the agency make certain programs at CDPVTC along with the career centers around the state more accessible to those with sensory disorders. The agency rejects this input concerning the CDPVTC as it already strives to accommodate every student to the best of its ability. The center is especially conscious to accommodate students as it relates to food allergies and concerns. Sensory disorders are not covered under the Americans with Disabilities Act (ADA). The individual coming into the career center would need to plan and bring items with them that can assist with their sensory disorder.

The SRC recommended more specific information on the training module for STEM for KELMS. The agency rejects this input because more specificity on the STEM training module is not needed here. The SRC recommended more information on collaborative activities concerning Pre—ETS services and the Department of Education and local school districts. The agency rejects this input because such collaborative activities have not been identified. Identifying potential collaborative activities will be part of the process.

The SRC asked whether Opportunity Youth Summit and the vocational behavior enhancement program at CDPVTC were similar to or enhancing the Youth Leadership Forum and the Department of Labor program respectively. The agency rejects this input because the programs mentioned above are

agency—specific, stand—alone programs that have no connection to other programs that may exist in other agencies.

The SRC recommended that we define eligible consumers more fully. The agency rejects this input because it feels further definition is not needed here. The SRC recommended that we specify the number of trainings related to asset development and financial education will take place. The agency rejects this input because it cannot specify the number of trainings at this time because it will be limited by staff availability. However, some trainings will be provided online, which can be accessed at any time.

The SRC recommended that we specify the number of business contacts available in our collaboration with the Coalition for Workforce Diversity. The agency rejects this input due to the fact that we feel the number is unnecessary and difficult to specify since it plans to expand the model statewide. The SRC recommended that we specify how often we will conduct training events aimed at employers doing business with the federal government on federal guidelines related to hiring individuals with disabilities. The agency rejects this input because it does not know specifically how often they will be done. The SRC recommended that we specify how many job coaches and what percentage of transition students will be involved in working together by the last semester of school. The agency rejects this input because it cannot be specified at this time.

The SRC recommended that we answer the question on how we will expand and improve services to individuals with disabilities. The agency rejects this input because it feels the question was answered completely. It feels that by using the needs assessment, satisfaction survey, and the case review system we can highlight our needs, strengths, and weaknesses. It can expand on what it does to address the needs and improve what it does to address the weaknesses.

The SRC recommended that we add something about transgender and sexual orientation to the question and to the answer concerning outreach procedures concerning minorities. The agency cannot change the question it was given to answer by the federal government but does accept this input and will add to its answer the protected classes, including sexual orientation, gender identity, and genetic information that are also listed on the signature statement of its application for services.

The SRC recommended that we add SSI to the answer that discusses the SGA Project. The agency rejects this input because that particular project relates to SSDI recipients only. The SRC recommended that our answer for innovation and expansion is not necessarily innovation and expansion. The agency rejects this input because the answer is exactly how we define and code innovation and expansion.

This section was the submission of the Office of the Blind on April 2, 2018 for the required Combined State Plan for Kentucky.

OFB did not reject any of the Council's input or recommendations

B. REQUEST FOR WAIVER OF STATEWIDENESS

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

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

The agency has not requested a waiver of state wideness.

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;

OVR maximizes all available resources in collaboration with all partners and agencies in assisting individuals with disabilities to achieve integrated competitive employment.

The agency will assure that the governor, in consultation with other appropriate agencies, will have in place interagency agreements or other mechanisms for interagency coordination between any appropriate public entity including the state Medicaid Program, public institutions of higher education and a component of the statewide workforce investment system. This will ensure the provision of vocational rehabilitation services described in subparagraph (A) other than those specified in paragraph (5) (D), and in paragraph (1) through (4) and (14) of Section 103 (a) of the Rehabilitation Act Amendments of 1998, that are included in the individualized plan for employment of an eligible individual, including the provision of such vocational rehabilitation services during the duration of any dispute.

Such agreements shall include the following:

A description of a method for defining the financial responsibility of a public entity for providing such services, and a provision stating the financial responsibility of such public entity for providing such services. Information specifying the conditions, terms, and procedures under which the office shall be reimbursed by other public entities for providing such services. Information specifying procedures for resolving interagency disputes under the agreement.

Information specifying policies and procedures for public entities to determine and identify the interagency coordination responsibilities of each public entity to promote the coordination and timely delivery of vocational rehabilitation services (except those services specified in paragraph (5)(D) and in paragraphs (1) through (4) and (14) of Section 103 (a) of the Act.

Responsibilities of Other Public Entities

If any public entity other than the office is obligated under Federal or State law, or assigned responsibility under State policy or under regulations set forth in the 1998 Amendments to the Act, to provide or pay for any services that are also considered to be vocational rehabilitation services (other than those specified in paragraph (5) (D) and in paragraphs (1) through (4) and (14) of Section 103 (a), such public entity shall fulfill that obligation or responsibility, either directly or by contract or other arrangement.

If a public entity other than the office fails to provide or pay for the services for an eligible individual, the office shall provide or pay for such services to the individual. The office may claim reimbursement for the services from the public entity that failed to provide or pay for such services. Such public entity shall reimburse the office pursuant to the terms of the interagency agreement or other mechanism described in the Rehabilitation Act Amendments of 1998, according to the procedures established in such agreement or mechanism pursuant to the established conditions, terms and procedures of reimbursement.

Signed agreements between respective officials of the public entities that outline and identify the responsibilities of each public entity relating to the provision of services shall be in place.

OVR developed collaborative relationships with several agencies and entities within and without the statewide workforce investment system both private and public agencies and programs. OVR works cooperatively with the following agencies to avoid the duplication of services and enhance the service delivery process for consumers.

Veterans Administration for the purpose of providing rehabilitation services including vocational guidance and counseling and job development and placement to veterans with disabilities. Collaboration and coordination of services occur between OVR and the Veterans Administration Rehabilitation and Employment Programs and utilized as a comparable benefit as appropriate.

173 school districts statewide consisting of 1,233 schools inclusive of 25,616 students with IEP's and 504 Plans that are potentially eligible/

Nine special education cooperative networks across the state created to enhance educational opportunities for Kentucky's children providing technical assistance, training; professional development, specialized services and research.

Department of Behavioral Health, Intellectual and Developmental Disabilities through their 14 Regional MH/IDD Boards for supported employment. Each board has multiple locations in their covered counties.

Kentucky Drug Courts for the purpose of facilitating employment and independence goals of individuals with disabilities. Kentucky Cabinet for Health and Family Services for the purpose of educating consumers about their medical coverage options.

Social Security Administration for the purpose of partnerships on employment incentives through the Ticket to Work and other incentive programs.

Community rehabilitation providers in the provision of employment services.

Kentucky Association of Persons in Supporting Employmentfirst whose mission is to "promote the improvement of Supported Employment services for persons with significant disabilities experiencing barriers to employment through education, advocacy, collaboration, policy change, elimination of barriers, empowerment and community participation". OFB has a staff person serving on the State APSE board.

Department of Medicaid Services and Department of Community Based Services

Kentuckians who receive Supplemental Nutrition Assistance program (SNAP) benefits and are eligible for the federally funded Employment and Training (E & T) program now receive assistance from Kentucky Career Centers to meet education and employment training needs. Department of Community Based Services-Public Assistance Programs. To better serve the people of Kentucky, several agencies in the state government created a new system for SNAP recipients to access locally available training opportunities and find open jobs. The collaboration is between the Cabinet for Health and Family Services (CHFS), which administers the SANP program through the Department for

Community Based Services (DCBS), the Kentucky Education and Workforce Development Cabinet's Department of Workforce Investment (DWI) and the 10 Local Workforce Development Boards.

Local Ophthalmologists and Optometrists and their respective professional associations in accessing needed services for consumers. Staff attend state conferences, distribute marketing materials and maintain working relationships with local offices and the area ophthalmologists and optometrists (patient referral and services).

American Printing House for the Blind, the world's largest source for adapted educational and daily living products.

Kentucky School for the Blind, K-12 public school serving Kentucky students who are blind and visually impaired; Short Course program (one to 12 weeks) of specialized instructional is also available to students throughout the school year;

Kentucky Federation of the Blind an advocacy organization that improves blind people's lives through advocacy, education, research, technology, and programs encouraging independence and self-confidence. Kentucky American Council of the Blind strives to improve the wellbeing of all blind and visually impaired people by serving as a representative national organization of blind people. Staff are involved through representation at their state and national conventions and representation of this advocacy organization sits on the State Rehabilitation Council.

Local Chambers of Commerce - Staff represent the agency across the state on local chamber organizations

International Centers specializing in advocacy and services to the foreign born and serve refugees, asylees, and immigrants (Louisville, Lexington, Bowling Green).

Area Employers in the development of working relationships increasing the number of successful employment outcomes for consumers

University of Kentucky Human Development Institute is a University Center of Excellence established by federal legislation to promote team-based approaches to provide services for individuals with disabilities and their families.

Other community based organizations such as Health clinics, HUD, Diabetes Foundation, The Lions Club and other community resources for consumers

The Kentucky Assistive Technology Service (KATS) is a statewide network of organizations and individuals connecting to enhance the availability of assistive technology devices and services to improve the productivity and quality of life for individuals with disabilities.

Visually Impaired Preschool Services offering service to infants, toddlers, and pre-schoolers who are visually impaired; and to maximize each child's developmental potential through direct services, advocacy, and community education

Kentucky Outreach and Information Network (KOIN)- Kentucky Cabinet for Health and Family Services/Department of Public Health planning committee for communication and message distribution to special populations during a public health emergency or other disastrous event.

The Kentucky Functional Needs Collaborative (KFNC) is a project of the Kentucky Department of Public Health. Their goal is to ensure an effective public health emergency response system in Kentucky for populations with functional and access needs.

KY-SPIN is the statewide Parent Training and Information (PTI) center that provides training, information and support to people with all types of disabilities (birth through 26 years old), their parents and families, and the professionals who serve them.

Kentucky Association of Community Employment Services (KACES) for the purpose of increasing services for individuals with disabilities including most significant disabilities and enhancing partnerships with community rehabilitation programs.

Social Security Administration: Information Exchange Agreement to receive data regarding consumers' work history.

The Office works in coordination with the Statewide Independent Living Council (SILC). A member from SILC sits on the Agency State Rehabilitation Council and the Blind Services Division Independent Living Program Manager represents the Agency on the SILC. Staff work collaboratively with the Independent Living Centers across the state in the service delivery process for consumers with visual impairments.

The Carl D. Perkins Vocational Training Center cooperates with the Job Corps Center to implement a smooth referral process for the purpose of enhancing education opportunities for students with disabilities

Other federal, state, and local agencies related to the rehabilitation of individuals with disabilities such as the Department of Protection and Advocacy, Department of Probation and Parole, Department of Workers Compensation, Department of Disability Determination.

The Kentucky Workforce Investment Board over the past year led a rigorous process to identify challenges that may be limiting the ability of employers, communities and citizens to reach their potential. To address these challenges, there are a series of steps that require a sustained commitment from state and local policymakers along with the support of Kentucky's business community. In 2017, responding to concerns over Kentucky's workforce participation rate, educational attainment statistics, and public health indications the KWIB revisited its workforce strategy, developing recommendations to support a lifetime continuum of training, preparation, and investment for citizens. The Kentucky Work Ready - An Urgent Call to Action has the following four goals:

- 1) Actively engage employers to drive Kentucky's workforce development system.***
- 2) Align and integrate P-12 adult education and postsecondary education to provide lifelong opportunities for Kentuckians that prepare them for the rapidly shifting realities of work in the future.***
- 3) Increase Kentucky's Workforce participation by creating opportunities, incenting workforce participation, and removing employment barriers for Kentuckians.***
- 4) Focus resources on the most effective initiatives and improve the return on our workforce investment utilizing data to constantly improve workforce development in Kentucky.***

Reciprocal referral services with the Office of Employment and Training and the Office of Vocational Rehabilitation: OET and OVR have established reciprocal referral services which allow for more efficient services to individuals with disabilities. OVR plans activities to improve services in the state for individuals with multiple impairments, including individuals with dual sensory loss. The Central Office administrative functions for these three workforce programs are centrally located in Frankfort to assure collaboration among the workforce partners. The Workforce Development Leadership team meets bimonthly to cover pertinent issues within the department. The office participates in the ten Workforce local boards throughout the state as well as serving on different committees of those boards.

Kentucky is one of the States participating in the operationalizing WIOA Co-Enrollment Cohort through the Department of Education and the Rehabilitation Services Administration and Department of Labor. All five of the core partners are represented on the team.

For more details regarding the Workforce initiatives in Kentucky see the Strategic Elements Section of this Combined State Plan.

The office has implemented an information and referral system to ensure that individuals who have visual disabilities will be provided accurate vocational rehabilitation information and guidance using appropriate modes of communication, to assist in preparing for, securing, retaining, or regaining employment. The office assures the referral of these individuals to other appropriate Federal and State programs if it is unable to serve them.

Appropriate referrals made through the system shall:

be to the Federal, State or local programs, including programs carried out by other components of the statewide workforce investment system in Kentucky that is best suited to address the specific employment needs of an individual with a disability; and include, for each of these programs, provision to the individual:

a notice of the referral by the designated State agency to the agency carrying out the program;

information identifying a specific point of contact within the agency carrying out the program; and

information and advice regarding the most suitable services to assist the individual to prepare for, secure, retain, or regain competitive integrated employment.

All applicants and eligible individuals or, as appropriate, the applicants' representatives or individuals' representatives, will be provided information and support services to assist the applicants and individuals in exercising informed choice throughout the rehabilitation process, consistent with Section 102 (d) of the Rehabilitation Act Amendment of 1998. The Client Assistance Program is available for additional assistance and advocacy during the entire rehabilitation process.

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

The Kentucky Assistive Technology Services (KATS) Network (the state program carried out under Section 4 of the Assistive Technology Act of 1998) for making assistive technology (AT) information, devices and services easily obtainable for people of any age and/or disability, their families, employers and employment service providers, educators, healthcare and social service providers. The KATS network serves Kentucky residents of all ages with disabilities of all types, their families, employers and employment service providers, educators, health care and social service providers, and others seeking information about assistive technology (AT) and accessible information technology.

The Kentucky Office of Vocational Rehabilitation is the lead agency for the KATS Network. The KATS Network in turn collaborates with four non—profit organizations to operate assistive technology regional centers to provide assistive technology demonstrations and device loans. The Carl D. Perkins Vocational Training Center operates a fifth regional center in collaboration with the KATS Network. The KATS Network also collaborates with the Hear Now Foundation hearing aid program and audiologists around the state to facilitate applications for hearing aids for low—income individuals. In addition, the KATS Network collaborates with several healthcare providers and two universities to refurbish and redistribute used durable medical equipment to individuals who need it. The Kentucky Assistive Technology Service (KATS) is a statewide network of organizations and individuals connecting to enhance the availability of assistive technology devices and services to improve the productivity and quality of life for individuals with disabilities.

Another program is the Kentucky Assistive Technology Loan Corporation (KATLC) for individuals. KATLC is programs funded by both private and public money to help Kentuckians with disabilities obtain assistive technology to improve their independence or quality of life.

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

In 2017 and 2018, the USDA Rural Development made available funding to rural Kentucky communities across the Commonwealth for the areas of Infrastructure, Access to E-Connectivity/Broadband, Resources for Opioid Crisis, Business, Essential Services and Access to Health Care and Education. Agency staff are aware of these programs and provide information and referral to consumers for these programs to meet their individual needs. University of Kentucky AgrAbility Program for the purpose of collaboration with the county extension offices and increased services in rehabilitation technology on the rural farm setting.

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

OVR serves out-of-school youth such as high school non-completers, students expelled from school or habitually truant, high school graduates and GED holders who are basic skills deficient, unemployed or underemployed, as well as those enrolled in postsecondary education. This is an area identified to increase outreach and strengthen those existing relationships in order to reach and engage on a higher level out-of-school youth. In Kentucky the vocational rehabilitation agency is one of two workforce programs that are fully integrated into the Kentucky Career Centers. This has strengthened our relationships with the other core programs of the workforce development system. OVR works collaboratively with the following additional agencies and groups of individuals. Juvenile and Criminal Justice Systems. Juvenile Justice is responsible for prevention programs for at-risk-youth, court intake, pre-trial detention, residential placement/treatment services, probation, community aftercare/reintegration programs and youth awaiting adult placement or court. Faith-based Organization (i.e. churches, Jewish Family Services, health clinics). Community organizations like Big Brothers, Big Sisters and other community based organizations. Service Organizations (i.e. Lions, Rotary, Kiwanis, Elks) Kentucky Cabinet for Health and Family Services that administers foster care and the division of family support (Medicaid, Foster Care and Supplemental Nutrition Assistance Program) Employers Kentucky Youth Career Center offices are located in Jefferson, Bullitt, and Shelby Counties, and are administered by KentuckianaWorks, the region's Workforce Development Board. Overseeing and coordinating programs in the community for youth ages 16 - 21, the Youth Career Centers offer innovative education, employment and youth empowerment services. The Kentucky Youth Career Center offers resume and interview preparation assistance, GED tutoring and help with testing fees, help applying to colleges and job-training programs, and financial assistance for college and job training. Depending on the need, referrals are made to other community services such as housing, transportation, food, and physical or mental health services. The Kentucky Youth Career Center also creates engagement opportunities with employers through internship and summer job programs, and fosters connections to mentors as well as other youth, and provides an ongoing series of workshops on life-enhancing topics.

5. STATE USE CONTRACTING PROGRAMS.

Under the state procurement code, administered by the Finance and Administration Cabinet, there are preferences to be given by governmental entities and political subdivisions in purchasing commodities or services from specified entities. Specifically, first preference is given to the products made by the Department of Corrections and Division of Prison Industries. Second preference shall be given either to: (1) the Kentucky Industries for the Blind or any other nonprofit corporation (2) qualified nonprofit agencies for individuals with severe disabilities i.e., Community Rehabilitation

Providers (CRP). This means that state and local governmental agencies are to purchase directly from Correctional Industries or an Industries contracted with by OFB and/or a CRP without having to utilize the competitive procurement processes.

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.

OVR works with many agencies to provide transition services and pre-employment transition services to students with disabilities. This is inclusive of the blind and visually impaired and the deaf and hard of hearing populations. All of the collaborations described below allow for pre-employment transition services to be provided by either OVR or our partners.

The Kentucky School for the Blind (KSB) serves students with visual disabilities from across the state. Students can live and attend classes at the school's Louisville location, or receive outreach services while attending their local elementary, middle and high schools. Staff in specialized positions actively participates in the vocational planning and academic progress of all of these students through collaboration and assistance with KSB's Community Based Instruction Program, and services such as vocational assessments, and annual Individual Education Plans. Staff collaborates on a variety of work-readiness and work-experience programs with KSB such as the Summer Work Program and The World of Work Program that provides work-based learning experiences in a competitive, integrated settings.

INSIGHT - Post-secondary Preparation Program for Students Who Are Blind or Significantly Visually Impaired is a collaborative project between the Kentucky Educational Development Corporation Special Education Cooperative, Kentucky School for the Blind, Kentucky School for the Blind Charitable Foundation, the Office of Vocational Rehabilitation, MCP Orientation and Mobility Services, and Morehead State University. INSIGHT is a unique program designed to provide college bound students an opportunity to experience some of the challenges encountered when entering a university or community college. Participants gain an increased awareness of the educational, recreational, and social opportunities and challenges of the post-secondary environment.

Staff also participates with the Kentucky Deaf-Blind Project, which helps promote cooperative transition services for youth who are deaf-blind, and students at the KSB, the KSD, or any other school the student may be attending. OVR has a DeafBlind Coordinator who is responsible for helping to facilitate pre-employment transition services, including all the previously described work readiness and summer work experience programs, for this population of students.

Workforce Development Boards: OVR counselors actively participate on their local Workforce Development Board's Youth and One Stop committees to enhance and make accessible the programs and services for transition age consumers.

Through Project CASE, a program developed from the use of Federal grant funding through the Rehabilitation Services Administration, OVR has stronger coordination and collaboration with the Youth Career Centers and other Kentucky Career Centers. Partnering with Eastern Kentucky Concentrated Employment Program (EKCEP) and KentuckianaWorks in the hiring of Career Pathway

Coordinators, and in cross-agency training of staff on career pathways for students with disabilities, Project CASE will ensure sustained partnerships.

KY AHEAD is a professional organization whose purpose is to promote communication among professionals in post-secondary education in order to improve the development and implementation of services for persons with disabilities. Campus Disability Services Centers are an essential resource for students with disabilities attending post-secondary educational institutions. VR counselors maintain relationships with disability service center staff and strongly encourage college students to utilize the services available at the centers so that they can receive individualized accommodations for their coursework. Every effort is made to arrange for a student to meet with staff at the disability center prior to entry into a post-secondary program in assuring a smooth transition for the individuals.

The Kentucky Special Education Cooperative Network consists of nine special education cooperatives located across the state. These cooperatives were formed to better meet the needs of the multiple school systems across Kentucky's 120 counties. All 173 local school districts, and the Kentucky Schools for the Blind and Deaf are members of a special education cooperative. Each cooperative has VI teachers and an AT specialist to assist students with visual needs. The school districts employ other specialty service providers such as Orientation and Mobility Specialists, Physical Therapists, and Speech Therapists. OVR works collaboratively with each cooperative network across the state in the provision of information and referral for students of all ages.

Additionally, OVR has contractual agreements with each of the nine special education cooperatives in the provision of pre-employment Transition Services. OVR has contracted with the Kentucky Career and Technical College System in the provision of pre-employment transition services that will provide opportunities for potentially eligible Kentucky students with disabilities to enhance their skills and readiness for post — secondary employment and training. OVR has a service fee memorandum for pre-employment transition services provided through the Jobs for American's Graduates (JAG) to students with disabilities in the school system. JAG is a state-based national non-profit organization dedicated to preventing dropouts among young people who have serious barriers to graduation and/or employment.

The office's executive director and state transition coordinators work directly when needed, with the Kentucky Interagency Transition Council. These involvements help facilitate the Department of Education's understanding of the unique transition needs of students with visual impairments and assists in understanding the educational process of Public Schools in the State.

The CWTP is designed to provide pre-employment transition services to all students with disabilities and provide transition services to assist VR eligible students with the most significant disabilities in transitioning from high school to competitive integrated employment. Student employment coordinators, funded by the local education agency, refer students to OVR in order to provide pre—employment transition services during their final three years of school. OVR has assigned counselors to each of Kentucky's 173 Local Education Agencies for the purpose of ensuring that all students with disabilities are served. The counselors work with referrals from special education and general education staff as well as the individual with the disability, their family, and other agencies who assist students with disabilities who are in need of transition. These counselors coordinate and authorize pre-employment transition services for students with disabilities, age 14-21, who are eligible or potentially eligible for VR services. The counselors also provide general coordination, information, and outreach activities about vocational rehabilitation services to the local education agency and student for use in transition planning.

Service coordination activities may also include resource information about vocational rehabilitation, presentations, handouts, and staff development. The counselor works in a collaborative team process

along with the local education agency to develop the transition services section of the Individualized Education Program (IEP) and the Individualized Plan for Employment (IPE) for transitioning students. Both the IEP and IPE will include, if appropriate, a statement of interagency responsibilities or any needed linkages by which the responsibilities of other entities are satisfied.

The student should be prepared to enter the competitive integrated workforce following the provision of necessary and needed services, as reflected in the IPE. The student should have ample opportunity to participate in Pre-employment transition services before they graduate.

The OVR counselor will engage in providing services that would be most beneficial to an individual in the early stages of employment exploration, such as counseling and self—advocacy training. These services are provided to students who are eligible or who are potentially eligible for VR services.

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

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

The Office partners with the Kentucky Department of Education through an interagency cooperative agreement to facilitate the transition of students with disabilities from school to the receipt of vocational rehabilitation services.

The Agency has agreements with all public institutions of higher learning in the state to meet the requirements of the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014, to develop agreements between the state vocational rehabilitation agencies and public institutions of higher education who serve mutual individuals with disabilities.

*The Office participates with the Kentucky Department of Education (KDE) and 21 other state agencies on the Kentucky Interagency Transition Council. This Council's agreement, entitled *The Kentucky Interagency Agreement on Transition Services*" provides for a statewide system of coordination among agencies in the delivery of transition services.*

OVR has an agreement with the KDE for transition planning and services for secondary students with disabilities. This agreement is in the process of being rewritten to meet the requirements of WIOA and in keeping with the upcoming merger of the blind and general agency. These agreements are designed to facilitate the transition of students with disabilities from the receipt of educational services in school, to the receipt of vocational rehabilitation services.

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

Under IDEA, schools are responsible for initiating transition planning at the age of 16 for each student identified with a disability. In Kentucky, transition planning starts at age 14. Since school faculty and staff are academic specialists, it is very important for the VR counselor to have early influence on the student's vocational future helping to avoid weak or unrealistic vocational training. The VR counselor acts as a vocational specialist forging the educational and future vocational needs of the child realistically together. The VR counselor is educated on the federal and state laws associated with transition and acts as an advocate for the student and parents.

VR counselors attend transition related meetings as early as age 14 and act as a consultant in the student's IEP. Early contact and intervention not only saves the VR counselor considerable time and effort, it allows the student and parents the opportunity to plan a realistic vocational path that will

lead them to the vocational goal of their choice. VR counselors shall attend student IEP meetings starting at age 14.

The school system will continue to have the primary responsibility for accommodations and student's educational needs. Once the student graduates OVR will become the primary agent. It is mandatory that the IPE be developed with the student 90 days after eligibility or prior to graduation, whichever comes first.

An IPE is developed for each student determined eligible and that meets the current order of selection for vocational rehabilitation services. The IPE should address the student's pre-employment transition services needs in the areas of job exploration counseling, work based learning experiences, counseling regarding post-secondary training opportunities, workplace readiness training to assist in the development of social and independent living skills, and instruction in self-advocacy.

OVR recognizes that it is the responsibility of Kentucky schools and OVR to coordinate and provide transition planning and services for students with disabilities. The VR counselor will provide consultation and technical assistance to assist the school as well as pre-employment transition services based on the student's needs. OVR recognizes that transition planning is an ongoing process and that a student may choose to go in a different direction requiring a change in their vocational goal. Ongoing exploration, work exposure, and vocational counseling will be provided to assist students in the decision making process.

Provisions under the cooperative agreement include: 1. Process for making student referrals to the OVR; 2. Determination of eligibility for OVR services; 3. Joint sharing and use of evaluations and assessments; 4. Planning and development of individualized programs (IEP and IPE) as a collaborative team process; 5. Role of educational personnel in transition planning; 6. Role of the OVR counselor in outreach to, identification of, and transition planning for eligible students with disabilities; 7. Use of memoranda of agreement (MOA) at the local level to facilitate and coordinate transition services for secondary students with disabilities; 8. State coordination with agencies in the provision of transition services inclusive of pre — employment transition services; 9. A comprehensive system of personnel development for qualified personnel responsible for transition services; 10. Determination of lead agencies; 11. Financial responsibilities; 12. Status of services for an individual student/consumer during a dispute; 13. Agency dispute resolution; 14. Due process for the individual student/consumer. 15. Memoranda of Agreements at the Local Level

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

Memoranda of agreements at the local level will be used in order to further the collaborative efforts detailed in the interagency cooperative agreement between the Kentucky Department of Education and the agency. These memoranda of agreements will define the basic tenets of the Community Work Transition Program (CWTP).

The rights and responsibilities of OVR and the local education agency for implementing and carrying out the CWTP are also detailed in these memoranda of agreements. OVR authorizes payment of services needed to determine eligibility and for any services provided that do not fall under the responsibility of the school district. OVR provides payment for pre-employment services such as career exploration, work experiences, self- advocacy training, and peer mentoring. D. procedures for outreach to and identification of students with disabilities who need transition services.

OVR obtains a list of the number of students between the ages of 14 and 21 per county that are accessing Educational Materials as an accommodation due to their disability in high school. The list is distributed to VR Counseling staff so they can identify where students with visual disabilities are

located in the counties they serve for outreach purposes. Staff is required to conduct outreach to school staff, including Teachers of the Visually Impaired, in order to strengthen partnerships and increasing awareness regarding services available defined as Pre-Employment Transition Services. Outreach and Involvement of the VR Counselor begins at age 14.

The CWTP is designed to provide pre-employment transition services to all students with disabilities and provide transition services to assist VR eligible students with the most significant disabilities in transitioning from high school to competitive integrated employment. Student employment coordinators, funded by the local education agency, refer students to OVR in order to provide pre—employment transition services during their final three years of school.

During this time, should the student need individualized transition services, counselors work with the employment coordinators to ensure that community vocational services provided lead to the completion of an individualized vocational evaluation and the development of individualized programs (IEP and IPE) to ensure successful transitioning from high school to post school activities, including employment. Upon completion of the IPE, further community—based vocational services are provided to the student in the form of training for the planned vocational goal. The desired outcome for participants in the CWTP Transition Services is a post—school outcome or paid employment.

Outreach to students also occurs through OVR's contractual agreements with the Kentucky Career and Technical Educational College System and the nine Special Education Cooperatives for pre-employment transition services.

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

Outreach to students occurs through OVR's contractual agreements with the Kentucky Career and Technical Educational College System and the nine Special Education Cooperatives for pre-employment transition services.

Kentucky School for the Blind provides an Outreach Consultant to each of the nine Special Education Cooperatives. These Outreach Consultants coordinate and provide training and professional collaboration for Teachers of the Visually Impaired and consult with Special Education Cooperative staff regarding the unique needs of students who are blind or visually impaired. The Office's Transition Coordinators stay actively involved in these regional initiatives.

Outreach and Involvement of the VR Counselor begins at age 14. OVR obtains a list of consumers per county that are accessing Educational Materials as an accommodation due to their disability in high school. The list is distributed to VR Counseling staff so they can identify where students with visual disabilities are located in the counties they serve for outreach purposes. Staff is required to conduct outreach to school staff in order to strengthen partnerships and increasing awareness regarding services available defined as Pre-Employment Transition Services.

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.

OVR maintains agreements with providers of private, non—profit vocational rehabilitation service providers to support achievement of successful competitive integrated employment outcomes for individuals with disabilities. OVR establishes relationships with Community Rehabilitation Programs (CRP's) by reviewing and approving submitted vendor applications that indicates the various types of services the CRP will provide. OVR currently works with 59 non-profit vendors. There are 40 CRP's that provide Employment and Retention services and 48 that provide supported employment. Each agency confirms their cooperative agreement to provision of services and expectations by signing an

established contract that is renewed annually. Other agreements with private, non-profit OVR service providers will be made as necessary.

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.

Kentucky's fourteen Regional Boards for Mental Health or Individuals with an Intellectual Disability are a primary source for extended services in KY. Cooperative budget planning is done between OVR and the Kentucky Department of Behavioral Health, Developmental and Intellectual Disabilities (DBHDID) so that state funds for all phases of supported employment can be sought by each agency. A cooperative agreement is also in place.

The Division of Behavioral Health (DBH) and OVR partnered together, and in 2010, Kentucky became the 12th state to participate in the Dartmouth College, Johnson and Johnson, Supported Employment Initiative to demonstrate the effectiveness of the IPS model for supported employment (Individualized Placement and Support, an Evidence—Based Practice). The first local pilot projects were launched prior to the close of 2010. Through the Dartmouth Project, a new SE funding partner was added when the Greater Cincinnati Health Foundation provided funding for 2 of the local pilots in Northern KY. IPS Supported Employment now includes all 13 Kentucky Community Mental Health Centers. In FY 2016 the partnership with Behavioral Health continues with the addition of 5 IPS sites outside of the Community Mental Health Centers and 2 sites serving those with substance abuse.

United Way monies have been utilized in minimal amounts for supported employment services by 16 Supported Employment programs in Kentucky. Ongoing follow-up services are provided through these United Way monies. These dollars are generally not "disability specific" and could assist in expansion of services to groups other than those served by the 14 community mental health centers.

Vendor status in the OVR Supported Employment Outcome-based Reimbursement program requires written and verbal verification of the provider's funding for ongoing support services. Monitoring and technical assistance is provided by the CRP Branch to assure that services are provided and funded appropriately. Agreements/contracts are developed annually and reviewed prior to renewal. OVR may provide financial support to providers of supported employment services to establish, develop or improve service programs to eligible consumers through establishment projects, and will adhere to the current procedure outlined in the agency Administrative Policies and Procedures in making funding selections and monitoring establishment projects.

The CRP Branch works closely with Kentucky APSE (Association of People Supporting Employment First) and its committees, and the 874K Coalition (a statewide Disability Advocacy Group) in a unified effort to secure additional state dollars for supported employment extended services.

The CRP Branch has been active in the development/improvement of Kentucky's Medicaid Waivers to create workable systems for coordinating supported employment services for eligible participants. Expansion of the supports for Community Living Waiver (Kentucky's Medicaid Waivers for individuals with Developmental Disabilities) and the Michelle P Waiver has resulted in increased referrals to OVR for supported employment services for mutually eligible participants. The self—determination and Participant Directed Services within Medicaid hold much promise for supported employment funding for extended services. A new Medicaid Waiver containing better service definitions and fee structures to support and fund supported employment services rolled out in 2014.

The CRP Branch works cooperatively with the Arc of Kentucky, among other groups, such as the Kentucky Association of Supporting Employment First (KYAPSE), the Department of Behavioral Health and Developmental and Intellectual Disabilities (BHDDID), the Kentucky Rehabilitation Association (KRA), UK Human Development Institute, ECU Center of Excellence, most of the Comprehensive Care Centers in the state, and many Supported Employment providers, to educate families about supported employment and enlist their assistance in impacting additional funds for supported employment.

OVR continues to advocate for expanded/improved Supported Living services, which are utilized by many supported employment participants to meet their needs for as independent a lifestyle as possible. The Hart Supported Living Program in KY offers very flexible state dollars available for all phases of independent living. However, statewide dollars are very limited.

OVR continues to work collaboratively with the Department of Behavioral Health, Developmental and Intellectual Disabilities, the Kentucky Council on Developmental Disabilities, Human Development Institute (HDI) (University of Kentucky), and the Arc of Kentucky to provide quality training on fundamentals of supported employment through the Supported Employment Training Project (SETP). This training is valuable in assuring that personnel who provide supported employment services have the necessary skills, values, and tools to deliver effective services. A leadership program in Supported Employment which has been developed through HDI at the University of Kentucky, which provides advanced training in systematic instruction, Discovery, job developing, and social role valorization.

The CRP Branch staff participates with Special Education planning units throughout the commonwealth to develop supported employment services for students exiting schools. Again, additional dollars will be needed for extended services in order to adequately serve the students.

A pilot project began in 2010 to demonstrate the effectiveness of Supported Employment/Community Rehabilitation Programs agencies working together with Post-Secondary Education programs to include people with developmental disabilities in classes and other college campus activities.

The CRP Branch continues efforts to utilize Social Security Work Incentives, including PASS (Plan for Achieving Self—Support) and IRWE (Impairment Related Work Expenses), for ongoing support/extended services when appropriate. Training opportunities are offered through the University of Kentucky Human Development Institute to provide technical assistance for supported employment personnel to learn more about these work incentive programs. In summary, the following potential funding sources for supported employment have been identified:

Local and county government Kentucky Commonwealth Council on Developmental Disabilities (grant opportunities only) United Way Social Security Work Incentives — Plan for Achieving Self—Support (PASS) and Impairment Related Work Expenses (IRWE) Natural Supports Division of Behavioral Health Division of Developmental and Intellectual Disabilities Hart Supported Living Funds Private pay agreements Supports for Community Living Waiver, Michelle P, and Brain Injury Medicaid Waivers.

Information regarding these potential funding sources is updated and shared by the Supported Employment Branch on a statewide basis to encourage increased funding for all phases of supported employment. 12. The OVR CRP Branch continues to explore innovative strategies with partnering state agencies to leverage funding to expand evidenced-based supported employment models (IPS) throughout Kentucky. Additionally, exploration continues to be conducted to identify underserved areas for those individuals with the most significant disabling conditions that may not be best suited for a labor market position, but would be better equipped to gain success and independence in a customized employment position, therefore leading to potential opportunities for CRP's to provide Customized Supported Employment which requires a unique and specialized skill set.

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

Effective October 1, 2018 the Combined Agency established an Employer Services Branch. This branch will be dedicated to employer outreach and consumer job placement services allowing for a consistent approach to services across the state. This will enable the agency to focus on more intensive employer outreach, including increased emphasis on corporate employers and partnership, and expand direct employer interaction statewide.

OVR employs fourteen job placement specialists across the state. These specialists are responsible for developing relationships with local employers to facilitate the placement of OVR consumers into competitive integrated employment. Employer engagement activities may include: 1) technical assistance to employers on hiring individuals with disabilities; 2) disability awareness training 3) ongoing and regular contact with employers 4) attending meetings of local Chambers of Commerce, Society of Human Resource Managers (SHRM), and other business related groups; and 5) no cost accessibility surveys to employers. OVR employs a statewide Job Placement Coordinator who coordinates all job placement activities. This staff member trains new job placement specialists, provides technical assistance to the job placement specialists and to districts where there are no job placement specialists, pursues agency—wide relationships with large employers, and acts as the agency contact for the National NET and TAP programs managed by CSAVR.

OVR recognizes that it has two customers the job seeker and the employer and works collaboratively with partner organizations in providing quality services on all levels. OVR is in a position to provide valuable services to 503 Federal Contractors with utilization goals of 7% of their workforce, employees with disabilities. OET shares with OVR and OFB the list of federal contractors it maintains and staff are assigned to contact those employers individually making them aware of vocational rehabilitation services available to them.

The Kentucky Skills Network (KSN) is a partnership of local and state workforce development organizations dedicated to providing proactive business services and industry skills development. Through local “Business Service Teams” the KSN has laid a foundation for coordinated employer services that will be leveraged in the coming four years.

The KSN offers a streamlined approach to assisting companies with recruiting talent, training new and existing employees, and developing tomorrow’s workforce. Consisting of four primary entities from the Kentucky Cabinet for Economic Development, Kentucky Education and Workforce Development Cabinet (i.e. OVR and OET), Kentucky Labor Cabinet, and the Kentucky Community and Technical College System, the KSN exists to provide unified, efficient, quality and seamless workforce services and resources to new, existing and expanding companies within the Commonwealth.

The mission of the KSN has four primary components:

1) Single point of contact approach 2) Streamlined workforce resources 3) Unified marketing and information 4) Talent/workforce development pipeline Kentucky Skills Network local business service teams are designed to provide a primary point of contact for employer customers. The partner with the best/most established relationship with an employer should maintain responsibility and communication with the customer and engage other partners in order to provide streamlined solutions-based business services plans. The structure of the KSN business services teams is comprised of three levels, each of which may act as a point of entry for contact with companies. Level one consists

of the State team. The State team includes one representative from each of the core partners (inclusive of VR).

These individuals work together to ensure that companies receive unified and coordinated information and services related to their workforce development needs. The KSN allows for the bringing together of the workforce and economic development programs and resources, thus providing a variety of ways to build workforce skills and ease training costs for employers. Through such options as reimbursable grants and tax credits for classroom training, on-the-job training, tuition and certification training, train-the-trainer travel, and entry level and skills upgrade training; Kentucky has resources that allow flexible and customizable training specific to company needs. In October 2015, the Kentucky Office for the Blind/Kentucky Career Center was awarded the Career Pathways for Individuals with Disabilities Model Demonstration Program Grant (CFDA 84.235N). This federal grant was provided through the Rehabilitation Services Administration (Department of Education) to create a program that would result in greater participation of VR-eligible individuals, including youth with disabilities, to acquire marketable skills and recognized postsecondary credentials necessary to secure competitive integrated employment in high-demand, high-quality occupations. Under this project employer engagement is a goal area. For all five years of the grant staff will conduct employer engagement activities such as regional employer conferences in the two project target areas on a variety of topics.

The Statewide Council for Vocational Rehabilitation (SCVR), Kentucky's State Rehabilitation Council (SRC), includes several employers and a representative of the Workforce Investment Board who provide important input on agency policy and activities related to employment. OVR, in conjunction with SCVR, conducts a Job Placement Month annually in October which includes many events around the state that promote collaboration with employers. Regional Employer Recognition Awards are given out during the month to employers who have hired OVR consumers. OVR will also continue to partner with local initiatives like Project SEARCH in Northern Kentucky and the Coalition for Workforce Diversity in Louisville, Lexington, Ashland, and Mayfield to identify and educate employers willing to develop new programs specifically designed to focus on hiring and training individuals with disabilities.

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

Kentucky's project is titled Creating Access to Successful Employment (Project CASE). Project CASE activities are consistent with section 101(d) of the Workforce Innovation and Opportunity Act (WIOA), with focus on improved alignment of Federal programs to strengthen the capacity of State workforce systems to meet emerging employers' needs with appropriately skilled and credentialed individuals. Project CASE provides a solid strategy for providing individuals with disabilities who face barriers to employment, with workforce investment activities, education, and supportive services to enter and retain employment.

Career Pathway initiatives in Kentucky over the past decade have created partnerships between industry and education at the secondary and postsecondary levels, and forged important links to strengthen local economies. Project CASE will help ensure that individuals with disabilities, even at the secondary school level, are not left out of participating in these existing initiatives, and can prepare for and obtain jobs in high-wage and high-demand occupations.

A variety of partnerships are needed in order to market the benefits of a variety of earn and learn opportunities, including registered apprenticeships to Kentucky business for individuals with disabilities including youth and students with disabilities. OFB will work with its existing partnerships among workforce, economic development, education and business entities in fostering work based learning opportunities.

OVR currently has in place innovative programs that provide high school students with a variety of work-based learning, financial literacy, self-advocacy training, job exploration, career counseling, and workplace readiness training opportunities that exist in the community with employers, in our rehabilitation center, and in post-secondary institutions.

OVR has contractual agreements with each of the nine special education cooperatives in the provision of pre-employment Transition Services. As well, OVR has contracted with the Kentucky Career and Technical College System in the provision of pre-employment transition services that will provide opportunities for potentially eligible Kentucky students with disabilities to enhance their skills and readiness for post — secondary employment and training.

OVR has a service fee memorandum for pre-employment transition services provided through the Jobs for American's Graduates (JAG) to students with disabilities in the school system. JAG is a state-based national non-profit organization dedicated to preventing dropouts among young people who have serious barriers to graduation and/or employment.

As a means of providing Pre—Employment Transition Services, OVR will work with partner agencies in Workforce Development to identify existing apprenticeship programs with employers with which OVR may partner to focus on incorporating students and youth with disabilities into the programs. The Kentucky Apprenticeship program recently moved from the Department of Labor to Workforce. OVR partners with the Office of Autism in order to understand how to assist youth on the spectrum with attaining and maintaining employment. A model program focused on creating apprenticeship opportunities for students and youth with disabilities will be developed in such a manner as to be replicated in urban and rural areas alike. This will expand employment opportunities for all the youth with disabilities in Kentucky.

The CWTP is designed to provide pre-employment transition services to all students with disabilities and provide transition services to assist VR eligible students with the most significant disabilities in transitioning from high school to competitive integrated employment. There will be a Supported Employment Consulting fee available with the Community Work Transition program for seamless transition into competitive integrated employment. There are specific programs in place with specialized services for the blind and visually impaired. The PATH Program focuses on job exploration, workplace readiness training, and self-advocacy and is an intensive three week program based on the work of Dr. Karen Wolffe that introduces employability skills to students with disabilities. The curriculum is specific to individuals that are blind or visually impaired. The Summer Work Experience Program is in collaboration with Community Rehabilitation Providers. CRPs are paid to find work experiences in competitive integrated settings for transition aged individuals. The goals of the work experience are to provide community based career exploration and the opportunity to practice work readiness skills. It is also hoped that by participating in the work experience program, employers will be open to providing more opportunities for individuals who are blind or visually impaired in their communities. The Summer Work Program is in collaboration with the Kentucky School for the Blind, Kentucky Kingdom, the American Printing House for the Blind, and the Louisville Zoo. The World of Work Program is another program in which the OFB and KSB provide work based learning experiences to students. The program provides competitive integrated work experiences to students that attend the Kentucky School for the Blind. The INSIGHT Post-Secondary Preparation Program is held each summer at Morehead State University. Students are able to participate in college classes, live in the dorm, and participate in social activities both on and off campus during this eight day program. They receive counseling on post-secondary opportunities and are taught the self-advocacy skills necessary to succeed in a post-secondary environment along with workplace readiness skills.

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;

In Kentucky, The Cabinet for Health and Family Services (CHFS) is home to most of the state's human services and health care programs, including Medicaid, the Department for Community Based Services and the Department for Public Health. Medicaid Services purchases quality healthcare and related services that produce positive outcomes for persons eligible for programs administered by the department.

Kentucky has a major new initiative underway that is accelerating the alignment and integration of core programs, partners and other resources: Kentucky Health Community Engagement, called "PATH" or "Partners to Advance Training and Health".

The Commonwealth's recently approved Medicaid 1115 Waiver includes a requirement that certain participants meet a 'community engagement' requirement in order to maintain Medicaid eligibility. Community engagement is defined as work, community service or job training or education, and because the requirement so closely mirrors the expertise and offerings of the WIOA core programs and partners Kentucky has chosen to award the services provided to the local workforce boards via contracts with the state.

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

The Department for Behavioral Health, Developmental and Intellectual Disabilities is the agency that provides quality information, services and support for individuals with needs related to mental illness, intellectual disability or other developmental disability and their families.

OVR is an active member of the Commonwealth Council for Developmental Disabilities participating in their strategic plan development and collaborating on projects to promote independence and employment for the specific population.

OVR works with the Division of Developmental and Intellectual Disabilities (DIDD) to improve quality Supported Employment Services and provide a smooth transition from VR Supported employment services to Long Term Support Services through the Supports for Community Living (SCL) and Michelle P. Medicaid waivers. KYOVR and DIDD jointly fund the Supported Employment Training Program at the University of Kentucky's Human Development Institute to train all Supported Employment Specialists in the state.

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

The Division of Behavioral Health (DBH) is responsible for the administration of state and federally funded mental health and substance abuse treatment services throughout the commonwealth. Publicly-funded community services are provided for Kentuckians who have problems with mental health, developmental and intellectual disabilities, or substance abuse, through Kentucky's 14 regional Boards for Mental Health or Individuals with an Intellectual Disability (Regional MHID Boards). Regional MHID Boards are private, nonprofit organizations established by KRS Chapter 210 which serve residents of a designated multi-county region. Regional MHID Boards are private, nonprofit organizations established by KRS Chapter 210 (see Related Links) which serve residents of a designated multi-county region.

Beginning in 2010, OVR has partnered with the Division of Behavioral Health (DBH) to implement the Individual Placement Service (IPS) Model, an evidenced based practice in Supported Employment for consumers with severe mental illness. The program started with four pilots and has grown to include all 14 Comprehensive Mental Health Centers (CMHC) and 4 additional agencies throughout Kentucky that provide Individual Placement and Support (IPS) supported employment services to individuals with Serious Mental Illness (SMI) and/or Substance Use. Within these agencies, there are a total of 51 Employment Specialists providing direct services to these populations.

In 2015, DBH provided OVR with \$250,000 to issue a Request for Proposals to select five pilot sites to implement IPS outside of the CMHCs. It provided an additional \$100,000 to implement IPS for consumers with Substance Abuse. In 2016 and 2017, there were 463 and 490 individuals, respectively, who obtained employment through the utilization of IPS supported employment services. Additionally, over this two-year period, there were over 5,000 individuals that received some IPS related service to aide in their pursuit of employment. The Office of Vocational Rehabilitation is pursuing a collaborative effort between the KY Department of Behavioral Health, the University of Kentucky and Eastern Kentucky University, to leverage funding for the continuation of state IPS Trainer and Fidelity Monitoring services. These services are a vital component to this evidenced-based practice of IPS supported employment services. These elements are vital to the continued support, growth and fidelity of the various programs throughout the state.

OVR serves on numerous councils that also have representation from the Department for Medicaid Services, DIDD and DBH, including the Commonwealth Council for Developmental Disabilities.

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;

On October 1, 2018 Kentucky integrated into a single vocational rehabilitation program the following programs that are operated under the federal Rehabilitation Act of 1973 (29 U.S.C. Sections 720 through 7510): (1) The vocational rehabilitation program for individuals with visual impairments; and (2) the vocational rehabilitation program for individuals with other disabilities. This section provides an overview of the combined agency structure.

There will be one Office and one Executive Director to oversee combined services.

One Branch will report directly to the Office and be responsible for ensuring program policies for OVR and OFB programs are consistent and there are four Divisions that will report directly to the Office: A new branch, Program Policy and Support Branch, will be established under the direct supervision of the Executive Director. Two (2) sections will be established in the branch, one to oversee policy development and compliance, and the second to provide necessary support functions, including

assistance with the Case Management System (CMS), contract coordination, and counselor certification tracking and required training.

A Division of Field Services will oversee the rehabilitation employment and training services and programs offered in Kentucky Career Centers, and other local office locations throughout the state. There will be eight (8) branches and seventeen (16) sections within the Division of Field Services.

Five (5) regional branches will be established to oversee the local offices and to serve as agency-designated representatives to work with local workforce boards, area development districts, and other partners in each designated workforce area. The specialized counselors serving the blind and visually impaired will continue to report directly to managers with experience in blind services as they do now. This will ensure a chain of command with specialized skills and knowledge, while providing consistent channel of communication, via the regional program managers for all of the field staff in local offices within OVR.

Division of Field Services — this Division will contain branches and positions, which administer the following services and programs: Regional and local career center services, which provide vocational counseling, guidance and other VR services to customers at the Kentucky Career Centers and at alternate locations throughout the state; Community Rehabilitation Programs Ranch; Assistive Technology Branch; Employer Services Branch — a new branch to focus on more intensive employer outreach and partnership; moving the job placement personnel into one branch will provide a consistent approach to these services across the state, enable the agency to focus on more intensive employer outreach, including increased emphasis on corporate employers and partnership, and expand direct employer interaction statewide. Transition coordination, which will coordinate the service provision model envisioned by the Workforce Innovations and Opportunities Act; Pre-ETS service coordination and monitoring; And the Deaf/Hard of Hearing Services Branch.

Division of Carl D. Perkins Vocational Training Center- This Division will continue to provide the services and programs of the current division with three (3) sections, Customer Support Section and Security and Dormitory Section and the Student Services Branch/

Division of Kentucky Blind Enterprises- This Division will continue to oversee the Blind Vendor Program as stipulated in the Randolph-Sheppard Act. The Repair/Training Branch within the current KBE will not be established in the new structure. The ability to hire and retain vending machine technicians has become increasingly difficult over the years and OFB is pursuing options to contract for this function, eliminating the need for a branch.

Division of Blind Services — This new Division will contain branches and positions, which administer blind and low vision specific functions and programs, including: McDowell Center Branch, which is currently housed in the Division of Consumer Services in the OFB; Bioptic Driving Independent Living/Older Blind services; Orientation and Mobility Services and Deaf/Blind Services. The Division of Blind services will also provide field services consultation for all staff specific to specialized services to the blind and visually impaired.

The total number of employees in the combined agency is 373 and this is inclusive of 129 Vocational Rehabilitation counselors.

The Kentucky Office of Vocational Rehabilitation maintains a system to collect and analyze on an annual basis data on qualified personnel needs and personnel development.

This section was the submission of the Office of Vocational Rehabilitation on April 2, 2018 for the required Combined State Plan for Kentucky. The Information in this reflects the 2016 calendar year and contains data for the number of personnel employed in the provision of vocational rehabilitation services for Kentucky Office of Vocational Rehabilitation (OVR). The Executive Leadership Team (ELT)

reviews this information as well as the State Rehabilitation Council. This ensures that the provision of quality services is consistent throughout the Commonwealth. In addition, the number of personnel, category, and qualifications of personnel needed by OVR, and a projection of the numbers of personnel that will be needed in five years are calculated. These calculations are based on projections of the number of individuals to be served. Personnel training files are maintained that contains records of each individual's training activities. Training accomplishments are reviewed annually and utilized in the Employee Performance Evaluation.

OVR has developed and maintains a system for review of all staff assignments, based on demographic data such as population, geographic area, caseload sizes and labor market analyses. In addition, the office solicits input from field management staff in identifying areas of understaffing, or of specific need. Forty-nine individuals left the agency during FFY 2016. Of that number 26 resigned and 23 retired. This resignation/retirement trend continues to be alarming because it impacts consistency of services, loss of institutional knowledge and loss of training funds that have been spent to provide the education, tools and skills necessary to provide quality services to our consumers. Of the total individuals that left the agency during the year 16 were counselors. Of that number 12 resigned and 4 retired. Out of those counselors that left the agency all met CSPD at the time of the departure and 8 were certified rehabilitation counselors. Thirteen counselors were hired during this same time period with all meeting CSPD requirements and one is a certified rehabilitation counselor. Six have a bachelor's degree in a related field and the remainder have a master's degree. Only one MRC was hired during this timeframe. The data shows that of the 123 VR counselors employed at the end of 2016, there are 63 (45%) that have been with the agency for less than 5 years and 38% have been with the agency 10 years or longer. The 123 counselors are located in the field offices and Carl D. Perkins Vocational Training Center (CDPVTTC).

A hiring freeze throughout much of 2016 has contributed significantly in the decrease of total number of counselor in the agency. The following information denotes the years of services for all counselors. Those with 30 years of service or more were 2% of the staff in 2014, .1% in 2015 and 2016. Those with 20-29 years of service were 13% of the staff in 2014 and 11% in 2015 and 2016. Those with 10-19 years of service were 30% of the staff in 2014, 32% in 2015 and 31% in 2016. Those with 5-9 years of service were 24% of the staff in 2014, 16% in 2015, and 18% in 2016. Those with less than 5 years of service were 31% in 2014, 40% in 2015 and 39% in 2016.

At the end of FY2016 there were 314 employees in the agency excluding positions contracted temporary for assistance. A hiring freeze impacted the agency significantly with only 21 individuals hired during the FY. Mostly essential positions were approved with new counselor hires accounting for 13 of the 21. The remainder of the new hires included 4 assistants, 2 instructors, 1 financial analyst and 1 facilities security officer. Two counselors, one assistant and the financial analyst left in less than year due to more lucrative job offers.

The agency continues to utilize regional managers to provide more direct support to field positions throughout the state. The 3 regional managers report directly to the Program Services Division Director. In addition to their responsibility to provide supervision to the field managers located in their region they also provide support to local staff in the absence of that field manager. All three regional managers were previously VR Counselors and field managers and all three meet CSPD as Certified Rehabilitation Counselors.

There were 15 managers during this fiscal year and of that 14 of the 15 are CRC. We consider the CSPD standard important for the managers as well as the counselors since the managers fill the role of the counselor when cases are vacant. This limits the amount of disruption of services to consumers.

OVR must work within the constraints of a state personnel cap. Currently the personnel cap is set at 395 full-time.

The following information shows the number of personnel, categories, vacancies, and projected personnel need for the Administrative and Program Staff and the Carl D. Perkins Vocational Training Center. We currently have 26 Central Office Administrative positions filled. We have 1 executive director position that is not vacant, and we will need that position in 5 years. That is a staff/consumer ratio of 1 to 27,491. We have a current vacancy for a program division director. We will need that position in 5 years. That is a staff/consumer ratio of 0 to 27,491. We have 1 executive secretary position that is filled, and we will need that position within 5 years. That is a staff/consumer ratio of 1 to 27,491. We have an assistant director position that is not vacant. We will need that position within 5 years. That is a staff/consumer ratio of 1 to 27,491. We have 6 program administrators and no vacancies. We will need 4 of those positions within 5 years. That is a staff/consumer ratio of 6 to 4,582. We have 3 supported employment staff with 1 vacancy. We will not need any more positions in this area within 5 years. That is a staff/consumer ratio of 3 to 9,164. We have filled an internal policy analyst position, and there is not a vacancy. We have no need of staff in this area within 5 years. That is a staff/consumer ratio of 1 to 27,491. We have 1 fiscal staff person with no vacancies. We have a need of 1 staff person in that area within 5 years. That is a staff/consumer ratio of 1 to 27,491. We have 1 resource management analyst with no vacancies. We need this position within 5 years. That is a staff/consumer ratio of 1 to 27,491. We have a program coordinator position that is currently filled and that we require within 5 years. That is a staff/consumer ratio of 1 to 27,491. We have 4 rehab tech staff members with no vacancies, but we will need two positions within five years. That is a staff/consumer ratio of 4 to 6,873. We have three assistants currently, and we will need one assistant position in the next five years. That is a staff/consumer ratio of 3 to 9,164. We have three regional program managers and we will need one more in the next five years. That is a staff/consumer ratio of 3 to 9,164. As far as field program staff are concerned, we currently have 215 employees. We have currently filled one of those positions and we shouldn't need any more in the next five years. That is a staff/consumer ratio of 1 to 27,491. We have 15 field branch manager positions filled with no current vacancies. However, we will need to fill 6 of those positions in the next 5 years. That is a staff/consumer ratio of 15 to 1833. We have 118 counselors and 21 vacancies. We need to fill 35 counselor positions in the next 5 years. That is a staff/consumer ratio of 118 to 233. We have 15 employment specialists and one current vacancy. We will need to fill 4 positions in the next five years. That is a staff/consumer ratio of 15 to 1833. We have 5 interpreter positions currently filled with 2 vacancies. We will need to fill 2 positions in the next 5 years. That is a staff consumer ratio of 5 to 5498. We have 62 assistants with 13 openings. We will need to fill 14 positions in the next 5 years. That is a staff/consumer ratio of 62 to 443. As far as Carl D. Perkins Vocational Training Center is concerned, we have 72 employees on staff at the center. We have the division director position filled but will need to fill it again within five years. That is a staff/consumer ratio of 1 to 120. We have 6 administrators at the center with 3 vacancies. We will need to fill 9 positions within 5 years. That is a staff/consumer ratio of 6 to 20. We have 9 assistant positions at the center with 2 needing to be filled. We will need to fill 10 positions in the next 5 years. That is a staff/consumer ratio of 9 to 13. There are no employment services staff at the center currently. We have no positions to fill, but we will need to fill 1 position in the next 5 years. That is a staff/consumer ratio of 0 to 120. We currently have 2 financial operations staff. We have 0 positions to fill, but we will need to fill 2 positions in the next five years. That is staff/consumer ratio of 2 to 60. We have 9 physical plant staff with 2 openings. We will need to fill 11 of those positions in the next 5 years. That is a staff/consumer ratio of 9 to 13. There are 5 dorm staff positions currently with 1 to fill. We will need to fill 5 of those positions in the next 5 years. That is a staff/consumer ratio of 5 to 24. There are 5 security positions filled with 3 needing to be filled. In the next 5 years, we will need to fill 5 positions. That is a staff/consumer ratio of 5 to 24. We have 3 rehabilitation counselors with 2 positions to fill. In the next 5 years, we will need to fill 4 of those positions. That is a staff/consumer ratio of 3 to 40. We have 1 recreation staff person with 1 position to fill. In the next 5 years, we will need to hire 3 staff. That is a staff/consumer ratio of 1 to 120. We have 8 nursing staff with 0 positions to fill. We will need to fill 8 positions in the next 5 years.

That is a staff/consumer ratio of 8 to 15. We have 9 therapeutic staff with 1 position to fill. In the next 5 years, we will need to fill 9 positions. That is a staff/consumer ratio of 9 to 13. We have 11 vocational training/staff/teachers with 2 positions to fill. We will need to fill 14 positions in the next 5 years. That is a staff/consumer ratio of 11 to 11. We have 1 evaluator with 2 evaluator vacancies. We will need to hire 2 evaluators in the next 5 years. That is a staff/consumer ratio of 1 to 120. We have 1 interpreter and no vacancies. We will need to hire 1 interpreter in the next 5 years. That is a staff/consumer ratio of 1 to 120. We have 1 admission counselor with no vacancies. We will need to hire 1 position in the next 5 years. That is a staff/consumer ratio of 1 to 120.

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;

This section was the submission of the Office for the Blind on April 2, 2018 for the required Combined State Plan for Kentucky.

OFB maintains a system to collect and analyze on an annual basis data on qualified personnel needs and personnel development. Information is analyzed on an annual basis for the number of personnel employed in the provision of vocational rehabilitation services for the blind and visually impaired. The Executive Leadership Team (ELT) reviews this information as well as the State Rehabilitation Council. This ensures that the provision of quality services is consistent throughout the Commonwealth. In addition, the number of personnel, category, and qualifications of personnel needed by OFB, and a projection of the numbers of personnel that will be needed in five years are calculated. These calculations are based on projections of the number of individuals to be served. Personnel training files are maintained that contains records of each individual's training activities. Assessments are conducted annually and utilized in the development and maintenance of their official career development plans as well as training, certification and educational activities.

OFB has developed and maintains a system for review of all staff assignments, based on demographic data such as population, geographic area, caseload sizes and labor market analyses. In addition, the office solicits input from field management staff in identifying areas of understaffing, or of specific need. OFB must work within the constraints of a state personnel cap.

Currently the personnel cap is set at 95 full-time. The current total number of personnel is 69 with seven positions in process of recruitment or hiring 8 positions (1 assistant, 2 VR Specialist, 1 coordinator and 4 VR counselors). We have two open positions for Orientation and Mobility in the Louisville region but have posted the positions 3 times with no candidate to fill. There is one vending technician position on the books for business enterprises that we currently are not filling. The following outlines the current number of personnel employed, in relation to the number served (staff/consumer ratio) broken down by personnel category.

Central Office Administrative = 8 1 Acting Executive Director - ratio 1/1523

1 program assistant director - vacant

4 rehabilitation administrators (one vacancy) - ratio 1/381

2 administrative assistants - ratio 1/762

VR and IL/OIB Field Program Staff - 48

3 VR administrators - ratio 1/507

18 VR counselors (4 vacancies)-ratio 1/85

7 IL/OIB counselors -1/110

1 deaf/blind VR coordinator - 1/43

2 O & M specialist - ratio 1/64

3 AT specialist - ratio 1/137

2 Bioptic driving instructors - ratio 1/38

12 administrative assistants (1 vacancy) - ratio 1/127

Business Enterprises = 4

1 director - ratio 1/52

2 program administration (one vacancy) - ratio 1/26

1 Vending Technician (one vacancy) 1/52

McDowell Center Staff = 20

1 facility administrator - ratio 1/78

2 rehabilitation administrators (one vacancy) - 1/39

4 administrative assistants - ratio 1/20

2 rehabilitation aides - ratio 1/39

2 orientation and mobility specialists (2 vacancies)

2 AT specialists - ratio 1/39

1 vocational evaluators - ratio 1/78

6 rehabilitation instructors (one vacancy) - ratio 1/13

1 nurse - ratio 1/78

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

This section was the submission of the Office of Vocational Rehabilitation on April 2, 2018 for the required Combined State Plan for Kentucky.

End of FY2016 there were 314 employees

26 Central Office Administrative positions

1 executive director

1 executive secretary

1 assistant director

3 regional managers

6 program administrators

3 supported employment staff

1 internal policy analyst

1 fiscal staff person

1 resource management analyst

1 program coordinator position

4 rehab tech staff

3 assistants currently

Field program staff-217 employees

15 managers

120 counselors

15 employment specialists

5 interpreter positions

62 assistants

Carl D. Perkins Vocational Training Center-72 employees

1 division director

6 administrators

9 assistants

0 employment services staff

2 financial operations staff

9 physical plant staff

5 dorm staff positions

5 security positions

3 rehabilitation counselors

1 recreation staff person

8 nursing staff

9 therapeutic staff

11 vocational training/staff/teachers

1 evaluator

1 interpreter

1 admission counselor

Currently, we require 2 Central Office Administrative person, 37 Field Program Staff, and 19 Carl D. Perkins Vocational Training Center Staff.

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.

In the next five years, we will require 15 Central Office Administrative Staff, 61 Field Program Staff, and 86 Carl D. Perkins Vocational Training Center Staff.

There were 27,491 consumers served during 2016 with an average caseload size of 198 for rehabilitation counselors in the field. The increase in caseload size is due to counselor vacancies. Case coverage was absorbed by other counselors due to inability to fill the positions. The average caseload size for counselors located at CDPVTC was 40.

Currently the agency is in Order of Selection and only serving category 1. There are 2180 on the waiting list at this time. There are plans to serve some of the consumers on the waiting list in the upcoming months, but no plans at this time to change the current Order of Selection. Even with Order of Selection a large number of consumers are being served and at the current staffing level there is a high risk of overburdening our current staff and potentially create situations where consumers may not be served in an expedient manner.

The personnel process for hiring is arduous and finding qualified candidates is difficult. Qualified applicants apply for positions, but too frequently there are hiring issues encountered such as applicants refusing to accept the position based on the salaries we can offer for the credentials they hold. The open positions for VR Counselors are extremely critical to services and the agency makes every effort to fill them with the most qualified candidates. The agency follows all established procedures to fill positions as soon as candidates can be recruited, hired and approved by the Education and Workforce Development Cabinet and State Office of Personnel. All attempts are made to employ rehabilitation professionals certified in their areas of expertise.

Decisions on filling open positions are based on a thorough budget analysis, demographic data such as population, geographic area, caseload sizes and labor market analyses. In addition, the office solicits input from field management staff in identifying areas of understaffing, or of specific needs. As positions became vacant the ELT discussed the needs of the program looking at the numbers served in correlation with the number of staff, workload and agency resources.

This section was the submission of the Office for the Blind on April 2, 2018 for the required Combined State Plan for Kentucky.

Currently there are four VR counselor vacancies in the Elizabethtown, Louisville and Bowling Green offices and OFB is unable to fill those positions due to budget constraints. OFB has additional personnel needs in the following areas: 1) business enterprises, 2) field services, 3) Center Based Services and 4) Central Office administration.

Kentucky is on target October 1, 2018, subject to federal approval, to integrate into a single vocational rehabilitation program the following programs that are operated under the federal Rehabilitation Act of 1973 (29 U.S.C. Sections 720 through 751): (1) the vocational rehabilitation program for individuals with visual impairments; and (2) the vocational rehabilitation program for individuals with other disabilities. Currently, we are working on creating a consistent regional and management unit structure to meet the needs of personnel.

Nineteen individuals or 25 percent of staff left the agency during FFY 2017 with seven of the staff lost to retirements. Two individuals were transferred to the fiscal budget integrity unit. There were four new hires or 5 percent during the 2017 federal year. Due to budget constraints only critical service positions were filled. The following denotes the length of experience of existing staff current at the submission of this plan.

Years of Service with the Agency 20 years or higher 20 percent 10-19 years - 34 percent 6-10 years - 18 percent and less than 5 years is 19%. There are fourteen individuals that are included in the 20 percent of staff that have been with the agency 20 years or more. Of those 5 or (36 percent) are VR assistants and 3 (21 percent) are program administrators. The other six staff are (1), VR Counselor, (1) IL/OIB counselor, (1) Nurse (1), and two instructors (2). There are staff that is close to retirement

age without the qualifying years of service. This is approximately another 11 percent of the staff of which three of the eight staff are central office administrators.

Currently 36 percent of Vocational Rehabilitation Counseling staff has been in their position less than 5 years and 64 percent have been with the agency 10 years or more. In 2017, there was turnover in 3 of the 18 counseling positions (17 percent). One counselor took a position with the VA and two resigned due to health reasons. Currently there are four VR Counselor vacancies. Agency places an emphasis on the professional development, educational advancement and skills acquisition for all OFB staff.

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.

This section was the submission of the Office of Vocational Rehabilitation April 2, 2018 for the required Combined State Plan for Kentucky.

In the next five years, we will require 15 Central Office Administrative Staff, 61 Field Program Staff, and 86 Carl D. Perkins Vocational Training Center Staff.

There were 27,491 consumers served during 2016 with an average caseload size of 198 for rehabilitation counselors in the field. The increase in caseload size is due to counselor vacancies. Case coverage was absorbed by other counselors due to inability to fill the positions. The average caseload size for counselors located at CDPVTC was 40.

Currently the agency is in Order of Selection and only serving category 1.

There are 2180 on the waiting list at this time. There are plans to serve some of the consumers on the waiting list in the upcoming months, but no plans at this time to change the current Order of Selection. Even with Order of Selection a large number of consumers are being served and at the current staffing level there is a high risk of overburdening our current staff and potentially create situations where consumers may not be served in an expedient manner.

The personnel process for hiring is arduous and finding qualified candidates is difficult. Qualified applicants apply for positions, but too frequently there are hiring issues encountered such as applicants refusing to accept the position based on the salaries we can offer for the credentials they hold. The open positions for VR Counselors are extremely critical to services and the agency makes every effort to fill them with the most qualified candidates. The agency follows all established procedures to fill positions as soon as candidates can be recruited, hired and approved by the Education and Workforce Development Cabinet and State Office of Personnel. All attempts are made to employ rehabilitation professionals certified in their areas of expertise.

Decisions on filling open positions are based on a thorough budget analysis, demographic data such as population, geographic area, caseload sizes and labor market analyses. In addition, the office solicits input from field management staff in identifying areas of understaffing, or of specific needs. As positions became vacant the ELT discussed the needs of the program looking at the numbers served in correlation with the number of staff, workload and agency resources.

This section was the submission of the Office for the Blind on April 2, 2018 for the required Combined State Plan for Kentucky.

Open positions for the VR Counselors is critical to services and will be filled with the most qualified candidates following all established procedures as soon as candidates can be recruited, hired and

approved by the Education and Workforce Development Cabinet and State Office of Personnel. All attempts will be made to employ rehabilitation professionals certified in their areas of expertise.

Decisions on filling open positions are based on a thorough budget analysis, demographic data such as population, geographic area, caseload sizes and labor market analyses. In addition, the office solicits input from field management staff in identifying areas of understaffing, or of specific needs. As positions became vacant the ELT discussed the needs of the program looking at the numbers served in correlation with the number of staff, workload and agency resources.

Central Office projections of needs in five years- 4 positions of 8 currently. This includes the following positions: executive director, program assistant director, 2 rehabilitation administrators.

VR and IL/OIB Field Program staff projections of needs in five years-12 positions out of 51 currently. This includes the following positions: VR administrator VR counselor IL/OIB Counselor administrative assistants. Business Enterprises projections of staff needs in five years- 1 position out of 3 currently. This includes the following positions: program administration and vending technicians.

McDowell Center Staff projections of needs in five years-ten positions out of 20 currently. This includes the following positions: facility administrator, rehabilitation administrator, administrative assistants, rehabilitation aide, orientation and mobility specialist, AT specialist and rehabilitation instructor.

B. PERSONNEL DEVELOPMENT

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

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

The University Of Kentucky (UK) is the only institution in the state that offers a Master's of Rehabilitation Counseling (MRC) program. This is a comprehensive accredited graduate program in rehabilitation counseling. The online Accelerated Distance Learning Master's program can be completed in sixteen months without on-campus attendance and at in-state tuition rates. Participants in the program are eligible to test for rehabilitation counselor certification after completing 75% of their course work in their final semester.

OVR partners with this agency and have staff attend advisory board meetings to encourage communication between the agencies. The agency staff that do not have their MRC are encouraged to apply for the CSPD scholarships offered by the university. CSPD grants from other universities are shared with staff through electronic announcements and staff are encouraged to apply. The state agency no longer provides assistance for tuition or related costs of attending school due to the loss of the in-service training grants.

The agency does allow the approved participants out-of-state MRC programs to apply for out-of-state travel approval for required trips to the university. If approved by the cabinet the individual can travel to the locations without using annual leave, but the agency does not pay for any travel expenses.

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

OVR obtains information from UK annually regarding the number of students enrolled and the number graduating from the MRC program with certification or licensure and /or with credentials to qualify for certification or licensure. The following information was provided from UK regarding their MRC 2016 statistics and includes both on—campus and distance learning students. In the fall of 2016,

101 were enrolled and 38 graduated. In the spring of 2017, 77 enrolled and 12 graduated. In the summer of 2017, 57 enrolled and 4 graduated. All of those who graduated achieved eligibility for licensure.

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.

OVR has only one employee participating in an MRC Program at this time. The individual qualified for the CSPD scholarship through the University of Kentucky and will complete her degree in 2018. Information on the MRC program at the University of Kentucky as well as other opportunities with universities that offer online programs and CSPD scholarship are disseminated to employees via email when information is made available. With state In-Service Training grants no longer available there is a steady decline of workers entering the field of vocational rehabilitation counseling. Even with the educational foundation it takes a year or more to learn the role of vocational rehabilitation counselor and without the foundational knowledge it takes longer. The agency makes every effort to fill these educational gaps with in-service training, but intensive classes on medical and psychosocial aspects of disability, guidance and counseling as well as assessment are difficult to replicate at a local agency level and the funds are not available to provide these trainings through the university.

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.

This section was the submission of the Office of Vocational Rehabilitation on April 2, 2018 for the required Combined State Plan for Kentucky.

OVR aggressively recruits, equips, trains and works to retain qualified professionals through coordination with institutions of higher education, professional and paraprofessional associations including personnel from minority backgrounds and individuals with disabilities.

OVR recognizes our staff as our greatest resource and is committed to the provision of training state personnel in assuring the provision of quality services to individuals resulting in positive employment outcomes. OVR will remain current on rehabilitation trends and best practices in the field for the purpose of developing and maintaining its internal training program and securing external training opportunities for its personnel. This includes utilizing online training resources that provide quality information in a cost effective manner and partnering with other agencies to share training and resources that is mutually beneficial.

OVR utilizes the state of Kentucky's Personnel Career Opportunities System (COS) an online recruitment system in recruitment efforts. OVR strives to achieve a more diverse workforce by recruiting and hiring individuals from protected classes. Recruitment of individuals with disabilities and those from minority backgrounds enables the agency to have highly competent individuals from all segments of society to accomplish its mission. The University of Kentucky's Graduate Program in Rehabilitation Counseling has partnered with Kentucky State University (KSU - a historically black liberal studies public institution) and the two state rehabilitation agencies to create an endorsement curriculum at KSU to recruit students into the field of rehabilitation counseling. UK has a "University

Scholars Program” with Kentucky State University (KSU). There were no students from KSU in 2017 that stated an interest in participating in an internship with the OVR.

Potential applicants are identified through recruitment, posting, and advertising according to the cultural diversity initiative and the agency’s Affirmative Action goals. When applicants are needed, OVR must request applications from the Kentucky Personnel Cabinet register. Individuals must be on the register identified as qualifying for the position. OVR works to leverage its successful performance in recruiting individuals who are minorities or with disabilities in the following ways: Work closely with consumer groups, attending local chapter and national meetings, hire the most qualified individual realizing that as an agency, (OVR strives to promote cultural diversity in recruiting disabled or minority candidates inclusive of bilingual candidates) encourage existing minority staff to play an active role in policy/program development, service delivery and program monitoring activities, ensure that programs are accessible to minorities, follow EEO guidelines and Affirmative Action Procedures, utilize Division of Consumer Services demographic and population data to determine the number of minorities and individuals with disabilities in regions and develop strategies to increase recruitment from these regions, encourage minorities and individuals with disabilities to play an active role in the Office of Vocational Rehabilitation State Rehabilitation Council, and participate in forums and provide input into policy and procedures.

OVR acknowledges the difficulty of recruiting and hiring individuals who are Certified Rehabilitation Counselors. There is a shortage of qualified candidates and the competitive salary expectation of graduates often exceeds salary constraints of the state OVR program. Additionally, OVR has found it difficult to hire and maintain staff in the rural areas throughout the state because candidates from outside these areas are often unwilling to relocate or have difficulty acclimating to cultural differences. As previously stated it is now more difficult to secure the educational training necessary to increase the rehabilitation foundation of employees hired with bachelor or related master’s degrees. This is due to lack of funds to provide assistance to employees with a desire and need to participate in formal education programs at the university. CSPD scholarships are extremely limited at the university level and the agency is no longer able to assist with costs not covered when the scholarship is available. The decrease of employees with formal education in vocational rehabilitation is quickly depleting as currently certified counselors resign for more lucrative opportunities and those being hired in their place do not have financial assistance to encourage them to increase their education. OVR has a personnel classification system in place, but it lacks salary competitiveness with other states. States surrounding the northern and western borders of Kentucky offer higher entry-level salaries based on state demographics and wage studies. The current system does allow for higher entry-level wages for new hires based on their education, certification and experience levels, but hiring at the minimum salary level puts the agency at a competitive disadvantage with other state agencies, bordering states and private agencies that utilize CRC’s. OVR works with the University of Kentucky in providing students of the MRC program opportunities to complete their practicum and internship hours with the agency. This is a benefit to the student by giving them an opportunity for hands on field experience as well as a recruitment tool for OVR. The Office of Diversity, Equality and Training (ODET) has a Minority Management Trainee Program (GMMTP). This is a recruitment and development tool to increase the representation of minority managers in state government. This program offers an experience that enables participants to cultivate the skills needed to serve Kentucky’s citizens in an effective and responsive manner. Participants receive in-depth, practical training through classroom instruction, on-the-job experience and special projects. Individuals must meet the following criteria to be eligible for the program: 1) be an ethnic minority, 2) Have one (1) year of state government service, 3) qualify for a grade 10 or higher job classification and 4) Aspire to be a manager and demonstrate exceptional management potential. OVR was previously able to offer educational incentives in the form of tuition assistance to counselors who did not meet CSPD. In addition, the agency also provided opportunities for employees in other positions within the agency

who held their bachelor degree and had a desire to enter the counseling field to obtain their MRC as well as for potential promotions within the agency. This was not only to meet CSPD standards, but also to encourage staff retention. The educational assistance program was suspended in 2015. The agency encourages the use of university CSPD grants for those employees interested in obtaining their Master of Rehabilitation Counseling degree, but the agency does not offer monetary assistance to them in their pursuit of a degree. Based on the new WIOA regulations the agency has modified the "Qualified Vocational Rehabilitation Counselor" definition. The agency now defines a qualified rehabilitation counselor as one who meets the following criteria: Certified Rehabilitation Counselor is preferred or has a master's degree from an accredited university in master's degree in rehabilitation, rehabilitation teaching or therapy, guidance and/or counseling, psychology, sociology, orientation and mobility, social work, special education with emphasis in vocational counseling or a related; OR At a minimum meets the Kentucky Personnel Cabinet standard to be certified as for the starting position of Voc Rehab Counselor, Grade 13. The Voc Rehab Counselor, Grade 13 position requires a master's degree in rehabilitation, rehabilitation teaching or therapy, guidance and/or counseling, psychology, sociology, orientation and mobility, social work, special education with emphasis in vocational counseling or a related field. In the absence of a master's degree a bachelor's degree in one of the above areas plus two years of professional experience in vocational rehabilitation, vocational assessment, employer relations or rehabilitation technology is required.

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

This section was the submission of the Office of Vocational Rehabilitation on April 2, 2018 for the required Combined State Plan for Kentucky.

OVR has set standards that are consistent with state personnel requirements for the entry level position of the Vocational Rehab Counselor, Grade 13 and continues to seek the most qualified candidates for the position. This includes working with universities to provide opportunities for field and internship experiences for those individuals in the MRC program. Employees without the criteria necessary to sit for the CRC or who meet the criteria, but have not obtained the certification are encouraged to do so.

The agency does not assist with tuition or related costs for the education, but does still provide coverage for the cost of the CRC examination one time pass or fail and provides assistance to cover renewal fees for the certification on a five-year rotation as required by the certifying body. Managers within the field are also required to meet the minimum qualified standard and are encouraged to meet the criteria for CRC and to obtain the certification. Currently all counselors meet the qualified standard. Although every effort is made to hire individuals that meet the standard set for OVR there are times when hiring someone that does not meet the criteria is in the best interest of serving consumers rather than maintaining a vacancy in the position until person meeting the standard can be located. When this situation occurs the Human Resource Development (HRD) Program Administrator will review the academic transcript of the individual to determine the steps necessary to meet the standards. The person will be provided with additional supervision until the standard is obtained.

Those primary certifications currently utilized within OVR are as follows: Certified Rehabilitation Counseling (CRCC/CRC)

Assistive Technology Professional (ATP/RESNA),

Certified Interpreters (RID)

Certified Driver Rehabilitation Specialist (CDRS)

Certified Orientation and Mobility Specialist (ACVREP/COMS), Assistive Technology Applications Certificate Program (ATACP/CSUN) Certified in Literary Braille (NCLB/NBPCB)

In addition to the above referenced professional positions employed by OVR, the agency also has need of professionals to fulfill medical and specialized services provided at CDPVTC. To fulfill those needs there are additional licensed or certified personnel such: Driver and Traffic Safety Training Certification - for those that provide on-the-road driver instructions to students Certified Daycare Director - for the childcare program Kentucky Professional Teaching - for the vocational instructors Certified Speech Pathologists Certified Public Account Certified Maintenance Employees and Drivers—plumbing, electric and CDL Some critical services must be contracted to provide specialized counseling services and those include; Licensed Clinical Social Worker Licensed Alcohol and Drug Abuse Counselor Licensed Psychologist The agency encourages employees to obtain certifications that demonstrate their achievement in their professional field. The agency will pay initial certification and ongoing maintenance fees for employees with approved certifications based on their job requirements.

Currently in fiscal year 2016 the agency has 123 counselor positions and 15 field manager positions. The agency plans to fill counselor vacancies as budget allows. Currently all field manager positions are filled.

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.

OVR utilizes best practices promoting retention among direct support professionals. To ensure that professionals providing services are appropriately and adequately trained and prepared in accordance with standards that are consistent with national certification standards that apply to the profession or discipline in which staff are employed, or standards sufficient to ensure the provision of quality vocational rehabilitation services, the OVR has established standards and objectives for each personnel classification and makes every attempt to provide activities to attain and maintain these standards.

OVR shall not discriminate on the basis of disability with regard to training and hiring. Based on the Rehabilitation Act Amendment of 1998 recommendations and the professionalism valued by the OVR, the agency has set the following standards for hiring Professional Vocational Rehabilitation Specialists and training current Professional Vocational Rehabilitation Specialists. These standards are in agreement with Kentucky's statutes and regulations.

Hiring New Employees OVR will hire the best possible candidate based on the following priority list: Master's Degree in appropriate discipline (Rehabilitation Counseling, Orientation and Mobility, Education) with national certification from the appropriate Certification Commission. Currently enrolled in an accredited Master's Degree program in Rehabilitation Counseling, have successfully completed 40 graduate program hours, and will be eligible to hold CRC certification within two years of hire.

Master's Degree from an accredited college or University in a related field and will be eligible to hold CRC certification within three years of the date of hire. Bachelor's Degree in a qualifying acceptable discipline that would allow acceptance into the graduate program and a commitment that they will enroll within one year of their initial probationary period.

Preference in hiring and promotion will be given to those individuals who are the most qualified candidates meeting national certification standards from minority backgrounds or individuals with disabilities. There are cases in which the state agency is unable to recruit individuals who meet the national standard. In those instances, the positions will be filled with an individual who has a Bachelor's Degree, and the new employee is expected to meet the national standard within three years of the date of hire.

OVR offers opportunities for maintaining certification requirements through training seminars and professional development conferences. OVR promotes acceptable candidates who are current employees when they are the best-qualified applicants for the position.

OVR has established a career ladder that is based on the achievement of a Master's Degree with certification as the highest level on the ladder. Current employees with a master's degree in Rehabilitation or appropriate area of discipline with certification supplemented by six years of experience in counseling, assessment, employer relations or rehabilitation technology. Current employees with a master's degree in appropriate area of discipline supplemented by two years of professional experience in rehabilitation counseling, assessment, employer relations or rehabilitation technology. Certification will be required within three years. Current employees with a bachelor's degree in appropriate area of discipline supplemented by two years' experience in a state vocational rehabilitation agency and the completion of a rehabilitation core curriculum met through in-service training or other strategies. Certification appropriate to the job will be encouraged.

Employees will be encouraged to obtain a master's degree in Rehabilitation or the appropriate discipline and obtain certification with the highest level of any national or State approved or recognized certification, licensing, registration, or other comparable requirements that apply to the area in which they are providing vocational rehabilitation services.

The following professional personnel classifications are included in the above standards: vocational rehabilitation counselor, independent living counselor, rehabilitation instructor, vocational evaluator, assistive technology specialist and orientation and mobility specialist.

4. STAFF DEVELOPMENT.

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

A. SYSTEM OF STAFF DEVELOPMENT

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

This section was the submission of the Office of Vocational Rehabilitation on April 2, 2018 for the required Combined State Plan for Kentucky.

The agency believes that a well-trained professional staff is essential in providing quality services to individuals with disabilities and achieving positive employment outcomes for agency consumers. The agency's professional development policy emphasizes education and training. The goal of career

development is to enhance skills to ensure quality services for consumers and to increase qualifications to allow for advancement opportunities when they arise. To obtain higher level positions with increased pay the employee must be qualified and assume more duties. In addition to these measures, the agency has also implemented a system of crediting individuals for pursuing professional development opportunities by recognizing it as part of the Employee Performance Plan each year. Assigned points based on the number of clock hours obtained for career development during the calendar year is applied to their employee evaluation.

Training plans are based on: federal laws, RSA monitoring findings, agency goals and directions, continuous improvement initiatives, training needs assessment, staff and consumer input. In 2015 the agency executive leadership developed training to emphasize Pre-Employment Transition Services based on the new law and agency policy changes. Agency field and program leadership received the training and the assistant director is in the process of traveling to all district offices to train field staff. This training program was approved for Certified Rehabilitation Counselors credits. In addition to the training an informational pamphlet and a video were developed for distribution to all OVR staff and educators throughout the state. This video is available on YouTube and is utilized to educate consumers, parents and educators on the law as it applies to OVR services. The use of the video insures consistency of information delivered in a captioned format, is easily accessible and asynchronously available. To address Section 511 of the Workforce Innovation and Opportunity Act the Kentucky Office of Vocational Rehabilitation, Kentucky Office for the Blind, Kentucky Human Development Institute, Commonwealth Council on Developmental Disabilities, Work Initiative, Build Inclusion and Annett Jett worked together to develop a Career Counseling Video, course quiz and survey. The team worked to distribute this to all those impacted by the regulation. The team required the completion of the quiz for submission to receive a certificate verifying that the training was delivered to them and salient points were identified.

For more than 10 years the agency utilized the Basic Vocational Rehabilitation In-Service Training Grant and Quality Vocational Rehabilitation In-Service Training Grant from the Rehabilitation Services Administration to support educational assistance for employees seeking to meet CSPD. It was also used for professional development opportunities for all staff. Because these grants are no longer available and due to budget constraints within the state the agency the tuition assistance program for employees remains suspended. Employees do receive information on CSPD programs available through universities and are encouraged to take advantage of these educational opportunities.

The budget cuts have brought about a greater emphasis on the online training opportunities as well as webinars and other methods of distance learning that are more cost efficient while still maintaining quality training. The agency has memorandum of agreement with Council on Post-Secondary Education to utilize their online training system with 50 online learning seats available for our use, video streaming services, website assistance and instruction design if needed. In addition, the Commonwealth of Kentucky purchased an enterprise learning management system and implemented it in 2016. The use of the learning management system has been opened up to contract personnel based on needs of the agency. Unfortunately the training system purchased and implemented by the state has accessibility flaws. Due to this problem there will be a new learning management/online training system introduced in July 2018. It places the agency in a difficult situation when online training is developed in an accessible format, but once placed in the available online system it becomes inaccessible.

The agency has also worked diligently with other state agencies to bring web-designs created by state entities into compliance with accessibility laws. This is an ongoing process and the agency will continue to push for changes necessary to make all state government technology and software systems fully accessible.

The following are examples of in-house curriculums for OVR employees. The majority of these training have been created within OVR, but some are products developed by the Office of Diversity, Equality and Training (ODET) located in the Kentucky Personnel Cabinet. New employees are required to participate in the following online training initiatives within the first three (3) months of employment: New Employee Orientation for State Government, Security Awareness, Time and Attendance Awareness, Anti-Harassment, Workplace Violence Prevention, and Executive Branch Ethics. In addition to the above named online training programs, all CDPVTC employees are required to take additional training programs online to fulfill the requirements for their Commission on Accreditation of Rehabilitation Facilities; Identification of Critical Incidents, Promoting Wellness of Consumers, Reporting Abuse & Neglect of Vulnerable Adults, and Consumer rights

Other Online training programs available include the following: Customer Service (ODET), Self-Employment, and Disability Awareness. The agency also uses online training and webinars developed by other state entities. Kentucky Employee Assistance Program and Kentucky Department of Library and Archives regularly distribute training opportunities that are shared with our employees. They explore topics such as depression awareness, anxiety disorders and mental health awareness, budgeting and dealing with angry customers.

In prior years face to face-training for new employees has been provided in three phases. Orientation and Skills Enhancement Training (SET) is where new employees receive an overview of the agency mission, philosophy, values, federal and state laws, appropriations, budget and planning, eligibility, assessment, vocational goal development, plan development, pre-employment transition services, confidentiality and ethics, services, supported employment, rehabilitation technology, diversity, disability awareness, Social Security Administration (SSA), Ticket to Work, Workforce Investment Opportunities Act (WIOA), common measures and information, personal care attendants and topics on specific disabilities. Training programs for all staff emphasize informed consumer choice and maximizing consumer direction of individualized rehabilitation plans.

In prior years particular importance was placed upon the 1998 Amendments, but the content has now changed to reflect the passage of WIOA. Information regarding to current research is disseminated to all staff via formal training opportunities as well as through other technological resources such as the Internet and email. Due to the hiring freeze and budgetary concerns, the majority of the training and development has fallen to the local areas for new employees. It is anticipated that this role will be provided through central office functions again in the upcoming fiscal year. The agency has a dedicated section on the agency website for training information delivery to all employees.

The agency also encourages staff to utilize the webinars offered through other entities both within and outside of state government. The information for registration and participation is disseminated via email to all staff. One partner in this endeavor is the Human Development Institute (HDI) from the University of Kentucky. In addition to our work with HDI on the Supported Employment Training Project the employees also utilize the webinar series topics offered by them during a spring, summer and fall training program on topics related to the rehabilitation field and specific disabilities. The rehabilitation counselor mentor program was implemented in June 2002 with pilot programs in six districts. There are currently 27 counselors and 2 managers that serve as mentors with 14 out of 15 districts represented. Certified mentors receive no additional pay for their services and are required to undergo additional training to maintain their mentor credentials. The development of the skills and knowledge required to perform this specific role provides an opportunity to build their resume. College and university level classes have been an integral element in staff career development.

The agency has strongly encouraged continuing education to meet CSPD standards and in the past has provided tuition assistance for staff to pursue degrees at the master level. The program is currently suspended due to the loss of the In-Service Training Grants as well as budgetary constraints within the state. The agency will continue to encourage employees to utilize the CSPD grants at the universities

to help them achieve their academic goals in rehabilitation. As appropriate the agency will continue to support employee advancement through reclassifications within state government. The agency continues to see the retirement of agency leaders and is cognizant of the need for leadership succession. The agency has utilized various opportunities to achieve this goal. The Academy of Leadership Exploration and Preparedness program (ALEAP) is designed to provide staff with opportunities to learn about and develop foundational skills. Staff first must participate in the prerequisite required courses (online and classroom setting of 50-60 hours of instruction) through the Office of Diversity, Equality and Training (ODET) located in the Kentucky Personnel Cabinet. ALEAP II consists of three face to face sessions on a variety of leadership topics and the completion of a project. There were 19 employees from OVR that completed ALEAP I in 2014 and of those individual there were 8 that went on to complete ALEAP II in 2016.

In 2014 the ODET began offering an opportunity for supervisors or aspiring supervisors to enhance their job skills through a Certificate of Supervisory Essentials (CSE) program. The program "focuses on the most important statutes, regulations, policies, procedures and best practices for supervisors employed by the Commonwealth" (from the CSE manual). There are 11 classes that a part of this program followed by a comprehensive examination at the end. Passing the examination with 80% accuracy is required to receive the certificate. If after taking the exam 3 times without success the candidate must repeat the classes to be eligible to sit for the exam again. New and aspiring managers within the agency are encouraged to begin to build their professional foundation by participating in this program.

This section was the submission of the Office for the Blind on April 2, 2018 for the required Combined State Plan for Kentucky.

OFB shall ensure that personnel in all classes of positions are adequately trained and prepared through a system of individual Career Development Plans. Personnel are referred to available on-line approved training programs through Universities and other training sources. Rehabilitation technology and significant research and information from studies of consumer needs and satisfaction surveys shall be emphasized in individual plans and in training programs.

All training for human resource development activities including tuition, books, in-service training programs and individual career development plans is supported through our regular basic support funds. The HRD components of training, organizational development and career development form the basis of the Human Resource Development Plan.

Staff career development is a combination of education, training and experience related to their specific professional disciplines. In order to adequately meet HRD needs of staff, OFB utilizes a variety of training resources and opportunities. OFB works closely with the general agency OVR in identifying available resources to meet the training needs of staff. Through a system of Individual Human Resource Development (HRD) OFB has developed procedures and activities to ensure that all employed personnel are appropriately and adequately trained and prepared. This includes standards that are consistent with national or state approved or recognized certification, licensing, registration or other comparable requirements that apply to the area in which such personnel are providing vocational rehabilitation services.

OFB utilizes internal and external resources for training. Numerous specialized training seminars and programs are available throughout the state. When it is cost effective, the agency participates in national training opportunities. Employees participate in training, based on individual needs and career development plans. Employees then are asked to share the information with others as appropriate.

OFB continues to provide training on the Rehabilitation Act Amendments of 1998 as well as training on the ADA, Workforce Innovation and Opportunity Act and the Ticket to Work and Work Incentives

Improvement Act (TWWIIA). Central office and other support staff as well as members of the State Rehabilitation Council will be included in all appropriate HRD activities. OFB is vested in using technology and is actively identifying potential web-based training programs that will allow staff the opportunity to utilize these alternative training methods for increased professional development.

The agency is in the process of the implementation of on-line learning (see section below on eLearning). OFB staff access eLearning internally and externally through webinars and courses through outside educational and training sources.

Implementation, planning and coordination of HRD training activities are the responsibility of the HRD Unit. , The University of Kentucky has available this fall (2018) RSA-CSPD Training Scholarships to employed state rehabilitation counselors to pursue a masters' degree. The agency does give staff information and opportunities to utilize other university programs. Career development allows employees the opportunity to develop and expand their career goals. Through new employee orientation, a training track on career development is conducted stressing that a career is a combination of education, training and experience related to a specific occupation.

Staff is apprised that career development is the responsibility of each employee and his/her immediate supervisor and that career planning is managed and addressed in conjunction with the employee evaluation system. Individual career plans are developed for employees in conjunction with their initial performance plan that will provide opportunities for OFB personnel to upgrade their skills and qualifications and to advance within the agency to higher level paying positions.

Career Plans are reviewed at the annual performance review in January and revised as needed. OFB conducts an annual training needs assessment used to provide appropriate in-service training programs; as well as provide information to update individual career development plans to meet identified needs. Areas identified by staff in 2018 were 1) Pre Employment Transition Services, 2) Changes to 911, 3) Credentialing and Skills Gains.

OFB is supportive of staff in keeping current with up to date best practices and makes sure that staff receive current research and practices. This is done through shared information through workshops, conferences, presentations, publications (Braille Monitor, Council of the Blind, American Foundation for the Blind's Journal of Vision Impairment and Blindness, and National Federation of the Blind, Reflections) as well as internet site resources.

OFB makes every effort to have representation at and participate in national and regional training events. In 2017 OFB staff attended the following National Conferences: National Council of State Agencies for the Blind, Council of State Administrators of Vocational Rehabilitation, Annual Summit VR Program Evaluation & Quality Assurance, National ADED, National Association of the Blind and Visually Impaired International Orientation and Mobility Conference, National Career Pathway Conference, and the National Randolph-Sheppard Forum.

All new hires attend new employee orientation and complete the required online coursework. Training occurred for the Rehabilitation Act, The ADA, Diversity, Career Development, Confidentiality, and The Role of the VR Counselor, the Introduction to the Eye and Low Vision and other pertinent topics. In 2017, staff participated in several in house and other state trainings offered. State Conferences attended were: the State Association of Persons Supporting Employmentfirst Conference, Governors EEO Conference, Kentucky Association of Education and Rehabilitation of the Blind and Visually Impaired (KAER) in March, Kentucky AHEAD, Kentucky Career Center Employer Conference and Kentucky Rehabilitation Association Conference.

Staff participated in teleconferences, webinars and online trainings on a variety of topics (American Foundation for the Blind E Learning, Supported Employment, Brain Injury, Assistive Technology, mental illness). Staff participated in training through the KY Finance and Administration Cabinet on

Financial Analysis. At the Charles W. McDowell Center monthly mini trainings were held for staff. VR field (counselors, assistants and other support staff) received in house training on the following: 1) Conflict Management 2) Case Management System/Coding, 3) Case Reviews, and 4) Pre Employment Transition Services, 5) WIOA 911, 6) Job Placement, and 6) Assessment. Several staff participated in training through the state government services including: 1) Hiring & Selection; 2) Overview of the Merit System; 3) Depression and Anxiety; 4) Performance Matters; 5) Coping with Difficult Behaviors; 6) Leadership and Communication; 7) Diversity in the Workplace; 8) Ethics; Trauma Informed Care; 9) Exceptional Children Conference; 10) The CareerIndex Plus; and 11) Motivational Interviewing. CRC credits were awarded to certified counselors attending trainings for approved content area.

Staff is knowledgeable regarding work incentive resources that are available on line and at no cost. Staff are knowledgeable of the process to obtain Benefits Analysis services through a BIN Liaison or a certified a Community Work Incentives Coordinator (CWIC). One OFB VR Counselor is a CWIC. Kentucky Learning Management System (KELMS). KELMS is a self-service training system and staff are seeing how it can be utilized to complement or link to KY virtual, our current e-learning system. Kentucky is implementing "Cornerstone" a new talent management system effective July 1, 2018. On a department level, workforce cross training occurred for all Department of Workforce Development Staff in 2017. Other partner related training is in the development stages.

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.

OVR makes every effort to have representation at and participate in national and regional and state training events. In 2016 OVR staff represented the agency at the following: National Rehabilitation Association Annual Conference, Southeast Region National Rehabilitation Association Conference, Kentucky Rehabilitation Association Annual Conference, and Kentucky Association of Persons for Supported Employment Conference, Kentucky AHEAD and Kentucky Brain Injury Alliance Conference.

Current information and research in the field of rehabilitation received by the Office is distributed to staff statewide or if applicable posted on our website as a document or as a link to obtain pertinent information. IRI journals, The Braille Monitor, The Braille Forum, Future Reflections, the Journal of Vision Impairments, and other journals and publications specific to the field are distributed to staff. Staff can make specific requests for information and research is done in the area for specific needed information to determine the need to subscribe to a publication or purchase books or materials for the staff. Information on Webinars through (i.e. EARN, JAN, EXPLORE VR, Workforce30one) are distributed to all staff via email on a weekly if not daily basis.

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.

OVR staff works to ensure that all materials are presented in the most accessible mode of communication that the consumer requires. OVR has one individual designated to function as the Deaf-Blind Coordinator statewide who has his MRC and is a CRC. On-going training opportunities ensure that skill levels are maintained or increased.

OVR utilizes a Williams Sound FM system for consumer and staff usage. The FM system is utilized for consumer meetings, trainings, conferences, counseling and other service activities. The FM system works for one speaker and several listeners. Counselors have access to Pocket Talkers utilized for conversing one on one with individuals who are hard of hearing. In order to accommodate consumers

with different levels of hearing loss, OVR has a variety of headphones for use such as head earphones, mon/bi/ in the ear, and neck loops for hearing aids that work with the FM system and Pocket Talker.

ASL and Foreign Language Interpreters are contracted as necessary to ensure that individuals who are deaf or who are from diverse cultural backgrounds and need interpreters to access services will be able to communicate in their native languages. Voice Description is provided for any videos and classroom teaching techniques. All materials utilized and distributed by the OVR are available in an accessible format, including large print, cassette tape, CD ROM, disc, audio recordings, Spanish or Braille with respect to the individual's informed choice. In an effort to assist staff with communication in a foreign language with consumers as needed Language Line is available as a resource.

The agency has designated counselors to work with our consumers who are deaf. The Rehabilitation Counselors for the Deaf (RCD) have sign language skills. The counselors work with the consumers to meet their communication needs to successfully participate in their rehabilitation plan. In addition, there are rehabilitation counselors who also serve as communication specialists because they have received specific training to meet the needs of consumers who are hard of hearing. The manager of the Deaf and Hard of Hearing Branch works to insure that all employees have adequate American Sign Language skills resources to communicate with consumers who are deaf through the use of staff interpreters or those engaged by contract. Certified sign-language interpreters are available to consumers and employees to ensure full participation in the rehabilitation programs.

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.

OVR shall coordinate its CSPD plans within the Kentucky Personnel System, to match the standards and qualifications of our personnel with personnel development under the Individuals with Disabilities Education Act (IDEA), and the standards under the Rehabilitation Act, as amended.

The Kentucky Interagency Transition Council meets on a quarterly basis to address continued fulfillment of the Kentucky Interagency Agreement on Transition Services for Youth with Disabilities. The Office of Vocational Rehabilitation, Office for the Blind and the Department of Education are three of the twelve state agencies that are parties to the agreement. One of the provisions of this agreement is cooperative training and staff development concerning transition issues. OVR staff attend Community Work Transition training offered by the University of Kentucky's Human Development Institute (HDI). In addition, staff attends the Kentucky AHEAD Conference (professionals in post-secondary education providing services to persons with disabilities) each year receiving valuable training and resources.

Rehabilitation counselors work collaboratively with the special education cooperatives, high school education teachers, local directors of special education, and job coaches for students transitioning from high school into employment. OVR Vocational Rehabilitation Counselors attend IEP and ARC meetings working with the team in establishing a vocational goal. This assures the development of the students IPE in conjunction with the vocational rehabilitation IEP. OVR provides support to teaching instructors, school staff and job coaches regarding rehabilitation issues and other areas of expertise such as Assistive Technology to ensure successful placements. Often rural schools do not have the needed resources; therefore OVR staff offer their expertise based on the individual needs of the student working closely with all staff involved with IDEA.

J. STATEWIDE ASSESSMENT

(Formerly known as Attachment 4.11(a)).

1. PROVIDE AN ASSESSMENT OF THE REHABILITATION NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, PARTICULARLY THE VR SERVICES NEEDS OF THOSE:

A. WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THEIR NEED FOR SUPPORTED EMPLOYMENT SERVICES;

This report provides a summary and the findings of the activities of the Kentucky Office of Vocational Rehabilitation (KYOVR) and the Office for the Blind (OFB) in an effort to comprehensively assess the various vocational rehabilitation (VR) needs in the Commonwealth of Kentucky. This assessment was conducted for strategic planning purposes and to meet the comprehensive needs assessment requirement of the Rehabilitation Services Administration (RSA) as defined in 34 CFR 361.29. This federal regulation requires the agency to assess the following areas related to VR: 1. Services to individuals with the most significant disabilities, including their need for supported employment services; 2. Services to individuals who are minorities or in unserved or underserved populations. 3. Services provided to individuals with disabilities through various components of the workforce development system 4. Youth and students with disabilities, including their need for transition services; 5. The need to establish, develop or improve community rehabilitation programs KYOVR and KYOFB previously conducted a comprehensive needs assessment in 2015. This assessment was conducted jointly taking into account that effective October 1, 2018 the blind and general agencies in Kentucky would be combined. Federal regulation requires the needs of individuals with disabilities in the state be assessed every three years. The current study is also intended to identify and provide recommendations for trends in the service needs, disability populations and any environmental factors possibly impacting Kentuckians with disabilities. Information from the current survey is intended to allow a more informed strategic planning process, seeking to address the identified trends and prioritize them based on data identified in the needs assessment. The current comprehensive needs assessment was conducted with guidance provided by the Kentucky Statewide Council for Vocational Rehabilitation (KYSCVR), and the Kentucky Office for the Blind State Rehabilitation Council (SRC) as required by 34 CFR 361.17(h)(3). KYSCVR and the SRC offered input into the methodology and data analysis of the assessment, assuring the research would adequately reach the target population, would return valid and reliable data, and would produce recommendations that would guide the strategic planning and budget development process.

This comprehensive needs assessment identified the following service needs of individuals with the most significant disabilities in the state: Support services such as transportation, etc.; Supported employment services; Benefits planning assistance Transition services Services after employment; Mental health treatment and counseling.

The assessment identified the following as very significant barriers to employment for individuals with the most significant disabilities: State budget restrictions; Employer attitudinal barriers; The lack of long-term support; The lack of information regarding disability resources; and The slow job market;

The assessment identified the following issues related to services for individuals from unserved or underserved populations: Post-employment services; Mental health treatment; and Supported employment services

It further identified a continued need for vocational rehabilitation services in Appalachian Eastern Kentucky, a traditionally underserved area of the state. It also identified individuals with mental illness and transition students as growing populations of individuals requiring vocational rehabilitation services. The assessment found the following issues related to services provided to individuals with disabilities through various components of the workforce investment system:

Communication issues; Knowledge of visual disabilities; Availability and staffing issues; Understanding and support of persons with disabilities.

The assessment identified the following issues related to services to individuals with disabilities provided by Community Rehabilitation Programs: More agencies needed to serve consumers (specifically supported employment); More services or enhanced (customized) services needed; More training to provide quality services; Transportation for consumers; More funding for agencies; Employer attitudinal barriers. The findings of this survey will be used by Kentucky OVR and OFB to conduct strategic planning for agency priorities, activities and services for the next three years as a combined agency. A Snapshot of Kentucky's Population with A Disability According to the Centers for Disease Control and Prevention 29.9% of adults in Kentucky experience a disability as compared to 22.5% in the United States. They state that "despite progress, adults with disabilities in Kentucky and across the country continue to experience significant differences in health characteristics and behaviors compared to adults without disabilities." Furthermore "Disability costs in healthcare expenditures are \$5.8 billion per year in Kentucky." Also, of those who reported having a limitation 25.9% of them reported an annual household income below \$15,000 as compared to 10.7% of those without a limitation. According to the 2017 Disability Compendium (which utilizes American Community 2016 Survey data) working age Kentuckians with a disability experience poverty at the highest state rate in the country at 34.0%. In the U.S. overall the poverty rate for working age civilians with disabilities is 26.7%. The Kentucky and U.S. poverty rates for working age civilians without disabilities are 14.7% and 11.6% respectively. Therefore, the poverty gap for working age civilians between Kentuckians with a disability and those without is 19.3% - making it the third highest rate of any state in the U.S., second to Rhode Island and Maine. Furthermore, in the same report figures show that Kentucky has only 30.5% of working age civilians with disabilities who are employed, with the U.S. rate being 35.9%. When looking at civilians of working age without disabilities those rates are 75.4% for Kentucky and 76.8% nationwide. When comparing the employment rate of residents without disabilities to those with disabilities Kentucky has the third highest employment gap of 44.9 points. These figures give credence to the fact that Kentucky has a great need for vocational rehabilitation services. The 2018 Scorecard released by Prosperity Now reports state-level data: 26.7% of all Kentucky households with a member with a disability live below the federal poverty threshold; and 52.8% of all Kentucky households with adults with disabilities live in liquid asset poverty, meaning that more than half of households with adults with disabilities do not have enough money to weather a significant emergency. Kentucky continues to have one of the highest prevalence rates of disability in the nation. According to the Annual Disability Statistics Compendium 2017 produced by Rehabilitation Research and Training Center on Disability Statistics and Demographics, using data from the 2016 American Community Survey, Kentucky's rate of disability (17.9%) was the second highest among all states, trailing only West Virginia (20.1%). In summary, Kentucky still has a higher rate of disability of the country as a whole and it is also higher than most states. The state's disabled population faces inordinate and disproportionate additional challenges because of the generally poor health and poor economic condition of the state. Methodology To keep costs to a minimum, the primary means used to collect data for this comprehensive needs assessment were surveys conducted of specific groups. The surveys were primarily conducted on-line through surveymonkey.com, although anyone could request accommodations through email or via telephone. The vast majority of responses, however, were obtained on-line. Kentucky is a diverse state, with large regional variations in population and socio-economic levels and this data collection process attempted to address these regional differences by ensuring statewide participation. To accomplish the goals of a comprehensive needs assessment as specified by the federal law, separate surveys were developed for the following groups: The general public, including individuals with disabilities and current and past consumers of KYOVR and KYOFB services; KYOVR and OFB Vocational Rehabilitation Counselors; Other KYOVR and OFB staff not engaged in direct counseling services; Community Rehabilitation Programs (CRPs); Kentucky Career Center staff; Employers; Transition students;

Disability Coordinators; Vision Itinerant teachers; and Eye Physicians The surveys were designed specifically for each group and are described in more detail below. Because the research was focused on the vocational rehabilitation service needs of individuals with disabilities, the input of service providers related to the needs of VR consumers was important, as they work on a daily basis with individuals with disabilities. KYOVR and OFB also sought input informally from various agency stakeholder groups, providing insight into the strengths, challenges and needs of the public VR program.

A. with the most significant disabilities, including their need for supported employment services; OVR General Public Survey The survey used for the general public was posted as a link on the KYOVR public website. The link was publicized on the OVR website along with instruction on how to request accommodations. The general public survey was sent to 10,550 consumers who had provided us with their email and permission to communicate in that manner. These were current consumers or closed in the last 2 years. The link was distributed through the KYOVR Facebook profile and to past and present consumers who had granted KYOVR permission to use email. The link was distributed electronically to the following groups: Kentucky Statewide Council for Vocational Rehabilitation (KYSCVR); Community Rehabilitation Programs; The Kentucky Development Disabilities Council and the agencies, organizations and groups with representation on the Council; Other disability-related email address lists. The electronic solicitation materials provided a brief explanation of the purpose of the survey and directed the individual to the survey link on the agency's public website. This link directed them to the online survey site, which again provided a brief explanation of the purpose of the survey, along with an explanation the information provided would be confidential and no identifying information would be requested. The survey was available between January 22, 2018 and March 16, 2018. The survey had various demographic items related to gender, age, county of residence and ethnic/racial background. The survey also had several items related to determining the number of individuals with disabilities participating, whether the individuals were consumers of KYOVR services, and their specific disability or the disability they represented. Respondents were then asked to indicate whether they were currently employed. In the next section, a list of VR services was presented, and respondents were asked to assess the current need for these services in the state. The respondents could choose whether they felt the need for the service was met, somewhat met, or unmet. They were then asked to rate potential barriers to employment on a scale of one to five, with five indicating a very significant barrier and one signifying the area was not a barrier to employment. Lastly, the respondents were asked to provide comments to assist KYOVR in addressing future VR service needs for individuals with disabilities. The last question on the survey gave respondents a chance to provide an open-ended comment response. An overwhelming 196 respondents provided actual comments. (Twenty-nine respondents listed their comment as "none" so they were eliminated from the calculation.) Almost one-third (32%) of responses were positive comments in the form of compliments for their counselor or praise for the agency. Twenty-nine percent said they needed more resources, transportation, or training. Twenty four percent had complaints about their counselor or frustration with communication difficulties. Eleven percent wish that OVR and OFB had more funding or a larger budget. Six hundred four (604) individuals started the General Public Survey and 511 (84.6%) completed it in its entirety. Of those that responded, 57.8% (349) identified themselves as having a disability and 71.7% (429) indicated they were a current or former consumer of VR services. Almost two-thirds (65.9%) of respondents were female. When asked if they were employed, 70.3% (418) stated they either work in a full or part-time capacity. Representation from all counties was proportional to the population distribution of the state. 91% (550) reported their ethnic/cultural affiliation as Caucasian and 6% (39) reported they were African-American. All other cultural groups had less than a 4% representation in the survey. Respondents were allowed to choose more than one race. According to the 2016 U.S. Census, racial demographics for Kentucky are 89% white (Caucasian), 9% black or African-American, 3% Hispanic, and 2% all other. It appears that response was representative of the racial diversity in Kentucky. The most prevalent age range of the Consumer

Survey respondents was 46-55 years of age (24.8%). Almost one-half (47%) were between 46-65 years of age. Public Survey for the Blind and Visually Impaired There were twenty-eight respondents for the public survey with sixty-eight percent of them being blind or having a vision impairment with the other thirty — two percent being an individual family member or parent with seventy-three percent stated they were buying or owned their own home. Seventy-six percent indicate they are happy with their living arrangements. Sixty-four percent of the respondents were female and twenty six percent male. Predominately the respondents were white (82%). The majority (57%) resided with a spouse/partner and children in the household. Forty percent of the respondents could read large print. Seventy-five percent of the respondents listed a diagnosis other than cataracts, glaucoma, diabetic retinopathy or macular degeneration with forty percent reporting their vision was progressive or likely to deteriorate. The majority of the respondents (39%) were high school graduates and twenty-five percent indicated they held a bachelor or graduate degree. Seventy-three percent held Social Security Disability Income benefits (SSDI). Fifty percent of the individuals reported they were working. The highest incomes reported were \$50,000 - \$75,000 (32%) and lower incomes reported were less than \$14,000 (24%). Over seventy percent reported the need for assistive technology over the past year and sixty-two present indicated they were knowledgeable regarding needed devices. Cost was listed as the most prohibitive barrier to receiving needed equipment. Thirty-one percent indicated they needed services or supports within the past year for employment. The top three challenges in finding employment were loss of benefits, individual job skills and available jobs (which may directly correlate with the individual skills level). Sixty — two percent of the respondents indicated that on the job training, job search assistance and on the job supports would be most helpful to them in finding employment however; eighty-seven percent said that assistive technology would be the most helpful. Fifty-five percent indicated they used public transportation within the past year and forty-five percent said they had not (however it could be they live in areas where public transportation is not available. Again, as in years past the most utilized form of transportation was friend or relative with cost being a prohibitive barrier to transportation. Around fifty-nine percent of individuals indicated there were adequate programs, services and supports for independent living in the home and community. When asked about services they could most benefit from in meeting their needs the top three were Bioptic Driving, Money Management and Mental health Services. Eighty percent indicated that the public school system was accommodating to them. For those indicating the system had not been accommodating they indicted they were not sensitive to issues, did not have enough skilled staff or they did not provide appropriate technology or orientation and mobility training.

OVRO/OFB Counselor Survey VR counselors are a valuable source of information when assessing VR service needs. VR counselors, by definition of their role, assess the needs of the person with a disability and develop a plan to utilize available services to assist VR consumers find suitable employment. Of the related professionals, they are best suited to identify gaps in service or trends in disabilities served; making their input a critical facet of the comprehensive needs assessment. To gather data related to the opinion of KYOVR and OFB counselors, the agency conducted an online survey between January 22, 2018 and March 16, 2018. The survey link was distributed by email, providing the basic purpose and goals of the survey in relation to the comprehensive needs assessment. The email also provided assurances that participation was voluntary and all responses would be confidential. For informational purposes, the counselor survey asked questions related to caseload size, educational training, most common impairments served, KYOVR/OFB district and number of years of service with KYOVR/OFB. They were then asked to review various population/diagnosis groups and indicate whether they had observed an increase, decrease, or no change in the number of individuals from this group on their caseload. Counselors were then presented with a list of VR services and asked to identify whether they had observed an increase, decrease, or no change in demand for those services. They were also asked questions related to the need for additional or enhanced Supported Employment services in their area, barriers to employment, and satisfaction with the local Kentucky Career Centers. The next section of the survey asked counselors to provide information related to their

utilization and satisfaction with services from local CRPs. Lastly, the counselors discussed potential needs and possible programs for the Perkins residential center. At the time of the OVR Counselor Survey there were 135 VR counselors employed by KYOVR and KYOFB with 91 (67%) starting the survey and 75 (56%) completing it in its entirety. Of the respondents, 53.8% (49) had worked 10 years or less with KYOVR or KYOFB and 88.9% (90) held a Master's degree. There was a wide variance in reported caseload size, with 49% (45) reporting a caseload size between 100 and 200 cases. Only 6% (5) of the sample stated their caseload had more than 300 active cases. OVR Staff Survey While input from the VR counselor is critical to any comprehensive needs assessment, it is important to note that many other KYOVR and professionals have valuable experience to be tapped to assist in the information gathering process. Job placement staff, assistants, administrators, and other professionals in the agency interact during many facets of the VR process and can provide information related to VR service needs and trends, which can then be compared to comments from other groups. The agency surveyed the non-counselor positions in a similar method as previous groups. Staff was surveyed utilizing an online process and email informing staff of the survey and, as in previous surveys, included an explanation of the survey, notification that participation was not mandatory and that results would be confidential. The email also clearly specified those whose primary job duties were related to counseling were not to respond to the survey. To gather data related to the opinion of other KYOVR staff, the agency conducted an online survey between January 22, 2018 and March 16, 2018. The VR staff survey was shorter in length than the counselor survey, but addressed similar issues. The survey requested the staff person indicate their district office and number of years working for KYOVR. As in the public survey, a list of VR services was provided and the participant was asked to indicate whether the need for each service was met, somewhat met or unmet. The survey also asked the respondent to indicate the services which were most in demand by KYOVR consumers. Lastly, the survey asked questions related to barriers to employment and satisfaction with the local Kentucky Career Centers.

Ninety four (94) staff started the OVR Other Staff Survey with 66 staff completing it. Currently there are 235 other staff at KYOVR so 40% started the survey and 28% completed it. For confidentiality reasons staff were not asked for their job duty or position title, as it could potentially reveal their identity. There was proportional participation in the survey throughout all areas of the state. A variety of employees responded as evidenced by the variance of years employed by the agency. The greatest numbers were in the ranges of 1-5 years (31%) and 11-15 years (22%) employed in Vocational Rehabilitation. Ironically, 3 years ago each of those ranges were only 18% of responses with the highest category at 6-10 years (25%). OFB Staff Survey Twenty (20) staff completed the OFB staff survey. Staff were asked to rate services requested by frequency and the top three services were mental health, Bioptic Driving and Benefits planning. When asked from their experience what populations they see as underserved, mental health, substance abuse and individuals with criminal backgrounds were the top three populations. Overall 40 percent of staff reported that relationships and collaboration within the workforce agencies was improved. Eighty percent of staff reported that consumers served would recommend our services to others. Staff reported the following top three challenges prevented individuals from obtaining and maintaining employment: 1) loss of benefits; 2) loss of medical coverage; 3) lack of assistive technologies and 4) a fear of losing other subsidies. The number one area that staff identified in supporting each other in meeting the overall needs of individuals who are blind and visually impaired is increased communications.

Employer Survey In an effort to assess the needs of the other customer — the employer, an online survey of employers was conducted. Each job placement specialist through KYOVR was asked to forward the survey email to employers which they have utilized in the past year or so. KYOVR surveyed these employers via the email distributed through the job placement specialists. The email provided information related to the specific purpose of the survey, steps to ensure confidentiality and voluntariness, and instructions to access and complete the survey. The survey was available between

January 22, 2018 and March 16, 2018. The employers were asked in the survey about their familiarity with KYOVR and KYOFB as well as their understanding of the agencies' services. The respondents were also asked if they have worked with or received services from either agency, as well as what their hiring needs are at this time. Next they were given a list of employee traits and asked to indicate the importance of each attribute. Also they were asked what barriers they encounter when hiring a person with a disability as well as the resources they need to help reduce those barriers. Lastly, they were asked to share how they have benefited from hiring an employee with a disability. The Job Placement Staff sent the Employer survey to their contact list and received 10 responses. Every time we attempt this needs assessment it is a struggle to get employers to respond. Therefore, we surveyed the employers along with the CRPs at the coalition meetings in Louisville and Eastern Kentucky. The general public CRPs and the OVR other staff (not counselors) saw support services, such as transportation and rental assistance, as their highest 'unmet need'. Individuals with disabilities and VR counselors also considered "support services" an 'unmet need' in the top 5 unmet needs. To explain and support this unmet need it is helpful to address the barriers. The CRPs, OVR counselors, and other OVR staff agreed that one of the highest barriers is transportation with other barriers being "agency/state budget restrictions" and "employer attitudinal barriers". The results of the Comprehensive Needs Assessment survey in 2018 still indicated an 'unmet need' of post-employment services, similar to the previous surveys. In 2011 only 40.5% of individuals completing the public survey indicated the need was unmet and gave post-employment services a rating average of only 1.62 (with 1 indicating need was unmet, 2 indicating somewhat met, and 3 indicating need was met). In 2018, similarly, 36.6% completing the public survey indicated the need was unmet his gave post-employment services a rating average of only 2.08. The rating average was still similar when separating those respondents with disabilities (34.7% and a rating of 1.92). However, this sentiment was not expressed by the surveys for the OVR counselors or other staff. Similarly, CRP's indicated post-employment as a significant need with 30% indicating it was an unmet need and a rating of 1.74. Less than twenty percent of respondents on each of those surveys (OVR counselor, other OVR staff) saw post-employment services as an 'unmet need'. Community Rehabilitation Programs (CRP's) and other OVR staff both saw mental health counseling and treatment as one of the greatest unmet needs of consumers. Furthermore CRP's increased the greatest in demand in the last 3 years to come from those with a diagnosis of Mental Illness (58.0% of respondents). Other OVR staff respondents indicated that psychological restoration was one of the services in greatest demand (35%). The identified need for mental health counseling and treatment has not been listed as the greatest need in the last few Comprehensive Needs Assessments. However, disability coordinators did indicate that mental health issues were a significant barrier for transition age youth as they exit the post-secondary educational setting. One of the barriers indicated on the Comprehensive Needs Assessment survey also reinforces the unmet need of post-employment services. According to the general public, as well as individuals with disabilities, there is a fairly significant barrier of the lack of long-term support. With the rating of 1 being a very significant barrier and 5 indicating no barrier, the lack of long-term support received a rating average of 2.42 according to individuals with disabilities and a 2.79 according to the general public. This indicated a significant barrier of long-term support when asked on the general public survey. This rating was concurred by CRPs who indicated a significant barrier (with a rating of 2.94). This information lends itself to support the need for both post-employment and long-term support services. Supported employment services were identified as a need across almost all groups surveyed. On the public survey, 34.7% of individuals with disabilities identified supported employment services as an 'unmet need', the highest needed service. Other staff rated supported employment as the third most needed. More than one-third (35.2%) of vocational rehabilitation counselors who responded to the survey saw a need for additional or enhanced supported employment services. There are various pieces of demographic data about the state that reinforce the continuing need for supported employment services. Individuals with intellectual and developmental disabilities (IDD) often benefit from supported employment services. These individuals

are not faring as well in Kentucky as they do nationally as demonstrated by the data compiled from State Data 2016: Only 20% of IDD individuals are served in integrated employment 368 individuals are on a waiting list for day and employment services Only 4% of total funding for all IDD agencies is used for integrated employment OVR continues to serve 10% of all consumers being individuals with Intellectual Disability (ID). And 8% of successful closures are individuals with ID. The percent of employment closures for all OVR consumers was 34% but for Individuals with ID it was 28%.

B. WHO ARE MINORITIES;

Ethnically, Kentucky remains a surprisingly homogenous state. Whereas the United States population is now 76.0% Caucasian (2016 American Community Survey), Kentucky is 89.4% Caucasian. African-Americans compose 9.2% of the population in Kentucky compared to the national average of 13.8%. Although growing, in 2010 the Hispanic population in the state was still estimated at only 3.3% while the percentage in the entire country was 17.3%. No other ethnic minorities in Kentucky composed more than 1.3% (Asian) of the population. Kentucky remains a fairly homogeneous state, with 89% of the population identifying themselves as Caucasian, nine percent African-American and two percent other minorities. Thirty-nine (6.6%) African Americans participated in the surveys and twenty-four (4.0%) respondents identified themselves as belonging to all other minority groups. The needs and barriers of these groups were similar to those identified by all respondents to the public survey with small differences. The top needs identified by all minorities were Benefits Planning services (a rating of 2.22 with a rating of 3.0 indicating the need was unmet and 48.6% of respondents indicating an 'unmet need'), and post-employment services (2.21 and 47.1%). Both benefits planning and post-employment services were rated as greater needs by respondents from minority backgrounds than by all respondents. Interestingly, when filtered for minority groups only 36% said they were employed full-time as compared to 52% of all respondents. The primary barriers to employment and independent living identified by all respondents with minorities were state budget restrictions (3.16 rating out of 5.0 with 5.0 being 'very significant barrier,' 32.7% rating it as a 'very significant barrier'), disability benefits (3.00, 24.5%) and lack of long-term support (2.98, 24.0%).

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

Appalachian Eastern Kentucky remains an underserved region of the state. The Appalachian area was determined by counties listed by the federal Appalachian Regional Commission (arc.gov). Its rural nature and persistent economic distress often result in an uneven and inadequate delivery of services. Of the 84 counties in Appalachia considered to be "distressed" (worst 10% in the nation) 37 of them lie in Kentucky (the other 47 are spread among the 9 other states).

Furthermore there are 11 additional counties with "distressed areas". When filtering the public survey for individuals in those 54 counties, the greatest needs were support services (45.7% with a rating of 2.20) followed by job placement (41.2% and 2.18) and post-employment services (41.0% and 2.18). The primary barriers to employment and independent living identified by all respondents from Appalachia were slow job market (3.1 rating out of 5.0 with 5.0 being 'very significant barrier,' 25.0% rating it as a 'very significant barrier'), state budget restrictions (2.9, 19.6%) and employer attitudes (2.9, 19.5%).

This is reflective of the poor job market in the Appalachian area as compared to the other filtered surveys. In fiscal year 2017, only 4.1% of expenditures KYOVR made to community rehabilitation programs were spent in the agency's three Eastern Kentucky districts, largely because the service providers just do not exist in the area. 12.9% of supported employment expenditures occurred in those three districts but that shows a great improvement — up from 5.5% in 2011.

Complicating service delivery in Eastern Kentucky, particularly related to employment services, is the persistent economic distress of the region. Jobs, particularly good jobs, are difficult to find and keep. The following table came from data on the website of the Appalachian Research Commission. More

than one out of four Eastern Kentuckians lives in poverty and one in eleven seeking work is unemployed.

In our survey of KYOVR counselors, they were asked to identify groups of consumers they felt were coming to them in increasing numbers. The most often identified group was individuals with mental illness (as it was in 2008). More than three of four (75.6%) of counselors reported that they were seeing more of these individuals coming to the agency for services.

The respondents to the Community Rehabilitation Program (CRP) survey also identified individuals with mental illness as a growing population needing their services. When asked what populations have increased over the last three years, 18 programs (58.1%) identified individuals with mental illness, the most responses for any one group. With current initiatives (KY HEALTH and Work Matters) in the state, this population is expected to continue to grow among KYOVR's clientele. Benefits Planning Services was rated highly as an 'unmet need' in the last 3 Comprehensive Needs Assessments.

In this context, benefits planning is meant as assisting individuals with disabilities and their families with information about federal and state benefits (especially Social Security), employment, and taxes and their unique circumstances and opportunities in relation to them.

KYOVR made significant efforts to make such services more available across the state since the needs assessment in 2008.

KYOVR used ARRA funds to finance for one year the Benefits Information Network that trained staff from community rehabilitation programs in the rudimentary aspects of benefits planning.

KYOVR also developed a fee for service for the initial review of the effect of employment and wages on benefits for individuals with disabilities interested in going to work. This training and fee for service was designed to give vocational rehabilitation counselors an additional tool to use with their consumers.

Then in 2015 the capacity was expanded by hiring Work Incentive Coordinators to work for OVR. Finally, in 2017 an online tool, DB101, was purchased and is provided free for anyone to use. These efforts to expand benefits planning services apparently did improve the rating of benefits planning in the 2018 needs assessment, at least among individuals with disabilities. In 2008, 44.0% of individuals with disabilities responding to the survey indicated there was an 'unmet need' for benefits planning services.

In 2018, the percentage was 32.5%. The percentage of individuals with disabilities identifying disability benefits as a very significant barrier to employment went from 39.0% in 2008 to 15.0% in 2018. Among all public respondents to the survey, the percentage identifying this as an 'unmet need' increased slightly (33.6% in 2008 and 38.6% in 2018) probably due to public awareness. However the percentage identifying disability benefits as a very significant barrier decreased (29.7% in 2008 and 16.7% in 2018).

Among vocational rehabilitation counselors, other KYOVR staff, and CRPs, benefits planning services were not rated highly as an 'unmet need' nor were disability benefits rated highly as a very significant barrier to employment.

Eye Physicians Survey There were sixty — two eye physicians that responded to the needs assessment survey distributed through the Kentucky Optometric Association. Eighty-five percent were optometrists and only five percent were ophthalmologists. Of the respondents sixty-three percent indicated they are aware of services provided by OFB with thirty-seven percent responding no they are not. This is reflected in the fact that sixty percent did not know where the closest office location was as a contact and only forty percent reporting they knew who to contact. Seventy-four percent indicated that business cards and brochures are preferred as a method of information for their patients and

eighty percent reported they would like a list of services offered by the agency. As reported in previous years the greatest unmet needs of individuals who are blind and visually impaired are low vision services, financial need and assistive technology.

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

In an effort to assess VR needs of individuals with disabilities served through other components of the state workforce investment system, an online survey of the Kentucky Career Centers was conducted. Each center has a manager of operations with the responsibility of general oversight of the facility.

KYOVR surveyed the managers of these centers via an email distributed through the Kentucky Career Centers distribution list. The email provided information related to the specific purpose of the survey, steps to ensure confidentiality and voluntariness, and instructions to access and complete the survey. The survey was available between January 22, 2018 and March 16, 2018.

Of the Kentucky Career Center managers surveyed, 13 (41%) responded. Most (71%) of them indicated training needs in the areas of vocational rehabilitation services and employer resources or tax credits. When asked about their current knowledge on a variety of topics related to workers with disabilities they expressed very limited knowledge. Most (71%) however, expressed a good or excellent working relationship with local KYOVR and KYOFB staff.

Similar to previous answers KCC staff indicated that they do not utilize resources for job-seekers with disabilities but instead refer to the local KYOVR or KYOFB offices. The Kentucky Career Center managers were asked in the survey if they were of the opinion there were gaps in services for individuals with disabilities in their local center and whether they felt there had been a change in the number of individuals with disabilities accessing their services. The respondents were also asked to discuss their knowledge or training needs related to serving individuals with disabilities, as well as their perception of their relationships with local KYOFB and KYOVR staff.

Lastly, they were asked what resources they use when serving a job-seeker with a disability. Of the Kentucky Career Center managers surveyed, 13 (41%) responded. Most (71%) of them indicated training needs in the areas of vocational rehabilitation services and employer resources or tax credits. When asked about their current knowledge on a variety of topics related to workers with disabilities they expressed very limited knowledge.

Most (71%) however, expressed a good or excellent working relationship with local KYOVR and KYOFB staff. Similar to previous answers KCC staff indicated that they do not utilize resources for job-seekers with disabilities but instead refer to the local KYOVR or KYOFB offices. Of the 13 responses received from the One-stop Career Centers over half indicated training needs in each of the following areas: Americans with Disabilities Act, Social Security work incentives, VR services, employer resources/tax credits, and mental illness.

When asked to rate their satisfaction of the KY OVR there was a rating of 2.8 (out of 4.0) however 71% rated the relationship as good or excellent. When given the opportunity to rate their own knowledge of VR services related to employment, deficits were noted in the areas of assistive technology and accessible formatting.

Of note, is that those who gave OVR an excellent rating also gave examples of working closely, and co-location as contributing to this quality relationship. In an effort to assess the needs of the other customer — the employer, an online survey of employers was conducted. Each job placement specialist through KYOVR was asked to forward the survey email to employers which they have utilized in the past year or so.

KYOVR surveyed these employers via the email distributed through the job placement specialists. The email provided information related to the specific purpose of the survey, steps to ensure confidentiality and voluntariness, and instructions to access and complete the survey. The survey was available between January 22, 2018 and March 16, 2018. The employers were asked in the survey about their familiarity with KYOVR and KYOFB as well as their understanding of the agencies' services. The respondents were also asked if they have worked with or received services from either agency, as well as what their hiring needs are at this time. Next they were given a list of employee traits and asked to indicate the importance of each attribute. Also they were asked what barriers they encounter when hiring a person with a disability as well as the resources they need to help reduce those barriers. Lastly, they were asked to share how they have benefited from hiring an employee with a disability.

Two focus groups were conducted with the coalition groups in the Louisville and Eastern Kentucky areas. When asked about populations not currently be served by OFB or OVR in Kentucky the following were mentioned: persons with severe mental health issues, case management needs, criminal backgrounds, transportation specifically in rural or evening shifts, and those with intellectual disabilities. When asked about areas where more involvement is needed the waiver services, community access, and supported employment for those not on the waiver. Suggestions for strategies they found effective included the coalition meetings, chambers of commerce, mayors' offices, community activities and a good support network. Emerging populations were identified as: mental health, younger employees, Autism Spectrum disorders, substance abuse, English as a Second Language, and older workers.

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

Disability Coordinator Survey The survey used for the disability coordinators was distributed through email. KYOVR/KYOFB surveyed the disability coordinators via an email distributed through the KYOFB transition coordinator's distribution list. The email provided information related to the specific purpose of the survey, steps to ensure confidentiality and voluntariness, and instructions to access and complete the survey. The survey was available between January 22, 2018 and March 16, 2018.

The survey asked the respondents what percentage of their students require a referral TO KYOVR or KYOFB. Next they were given a list of typical services needed by post-secondary students and asked to indicate which services they provide. Then they were asked about their goals or expectations of working with a vocational rehabilitation counselor. They were also given a list of typical barriers in the post-secondary institution and asked to indicate the barriers which they face as disability coordinators. In the next section, they were given a list of statements about the assistance from vocational rehabilitation staff and asked whether they agreed with them.

Next a list of transition support services was presented, and respondents were asked to rate their skills in their importance in the post-secondary setting. Then they were asked about the barriers their students face when attempting employment after graduation. Lastly, they were asked to compare the success of transition students with disabilities to their peers. Then they were asked to provide any other comments.

The Disability Coordinator survey was sent to a distribution list from KY AHEAD (Kentucky Association on Higher Education and Disability). The survey was completed by 13 disability coordinators from a diverse collection of post-secondary institutions. Most of them indicate very few of their students require a referral to vocational rehabilitation (assuming they already receive VR services if needed). All of them indicated they provide testing accommodations and notetakers/interpreters. Most (92%)

indicate that they rely on OVR or OFB to provide the expertise of assistive technology. The greatest issues they experience are funding (85%) and availability of staff with specialized training (77%). When asked about the support and knowledge of VR counselors most responded positively.

When asked about areas of support services which are crucial to the transition process it was that time management, self-initiative and self-management skills were paramount (according to 85% of respondents). When asked about barriers for transition youth the greatest response was soft skills such as interpersonal, money management and decision-making skills.

The survey used for the disability coordinators was distributed through email. KYOVR/KYOFB surveyed the disability coordinators via an email distributed through the KYOFB transition coordinator's distribution list. The email provided information related to the specific purpose of the survey, steps to ensure confidentiality and voluntariness, and instructions to access and complete the survey. The survey was available between January 22, 2018 and March 16, 2018.

The survey asked the respondents what percentage of their students require a referral TO KYOVR or KYOFB. Next they were given a list of typical services needed by post-secondary students and asked to indicate which services they provide. Then they were asked about their goals or expectations of working with a vocational rehabilitation counselor. They were also given a list of typical barriers in the post-secondary institution and asked to indicate the barriers which they face as disability coordinators.

In the next section, they were given a list of statements about the assistance from vocational rehabilitation staff and asked whether they agreed with them. Next a list of transition support services was presented, and respondents were asked to rate their skills in their importance in the post-secondary setting. Then they were asked about the barriers their students face when attempting employment after graduation. Lastly, they were asked to compare the success of transition students with disabilities to their peers. Then they were asked to provide any other comments.

Visually Impaired Teachers Survey Eight Teachers of the Visually Impaired (VI) were asked questions. We asked VI teachers what triggers a referral to OFB. The choices "Age" (100%) and "Grade Level" (87%) was chosen more often than Age, Law Requirements, Family Request, etc. With new WIOA emphasis on "Pre-Employment Transition Services," VR counselors now communicate the need for earlier involvement with students and their families. Ideally, students and families should understand the role of the VR counselor in planning for future employment, and the services and programs we make available to students during their secondary school years. This was evident as fifty percent of the teachers responded this year that this triggers a referral to Office for the Blind.

One questions asked the VI teachers about their need for more information regarding pre-employment transition services. Twenty-eight percent responded they were knowledgeable with another twenty-eight percent stated they were not knowledgeable leaving forty-six percent indicated they needed further information on this topic.

Again this year, VI teachers indicated that their expectations in working with a counselor are mainly to provide resources for the student/family, and to include the counselor as part of the student's IEP team. However, overall the survey indicated that the VI teachers expect greater involvement in the provision of guidance and counseling, training, the employment proves and career counseling. These beliefs may indicate a need to not only affirm our own commitment to early involvement in planning, but to find new ways to stay involved and easily accessible. VI teachers gave positive ratings to OFB's counseling staff in areas such as knowledge, rapport building ability, and ability to connect to needed vocational services such as training, job search and placement, including post-secondary education as well the development of strong appropriate vocational goals.

The VI teachers listed barriers to the accessing VR services is a lack of information regarding services. The top three areas that VI teachers indicated are crucial in the Transition process are assistance with employment, work experiences and Assistive Technology. The top two barriers to employment for transition age students identified by the teachers are transportation and the lack of soft skills (i.e. interpersonal/social skills, money and time management and decision-making).

Youth Transition Survey The Youth Transition survey was sent to 2,857 consumer emails who were listed as under age 25 and had given us permission to communicate by email. 43% of the 97 respondents were between the ages of 19-21. Respondents experienced a variety of impairments, schools, training institutions and employment situations, reflecting the diversity of consumers served by KYOVR and KYOFB. 38% of respondents were working above minimum wage. When asked about career exploration more than half have explored careers and also know what career they want in the future (52 and 55% respectively). Almost two-thirds (64%) have had real life experiences and the completing job applications (65%) and receiving a paycheck (64%). 87% of respondents claim to do chores at home and 89% say they can use a computer to find information on the internet. Almost half (47%) are currently attending post-secondary training and also they claim to know what training is needed for their career (43%). Twenty two (22) % have attended one of the post-secondary transition programs and 25% are aware of those programs.

When rating themselves on independent living skills the areas which needed greatest improvement were asking for accommodations and interviewing skills (both at 46%). The survey used for the transition youth was distributed through email. The link was distributed to past and present consumers who were under the age of 25 and had granted KYOVR/KYOFB permission to use email.

The electronic solicitation materials provided a brief explanation of the purpose of the survey and directed the individual to the survey link. This link directed them to the online survey site, which again provided a brief explanation of the purpose of the survey, along with an explanation the information provided would be confidential and no identifying information would be requested. The survey was available between January 22, 2018 and March 16, 2018.

The survey had various demographic items related to age, current situation and employment. If someone indicated that they were over the age of 24 then their answers were not considered in the survey. The survey also had several items related to their work history, and their skills in the 4 transition areas: job exploration, work readiness, work-based learning, and vocational counseling. Next they were provided with a list of transition programs and asked if they had received those services or if they were aware of them.

In the next section, a list of adult living skills was presented, and respondents were asked to rate their skills in those areas. Next they were asked about their current living arrangement both now and in five year. They were then given a list of KYOVR and KYOFB services and asked to indicate their need for those services.

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

Many of the RSA required focus areas of the comprehensive needs assessment reference the possible need for additional and enhanced Community Rehabilitation Program (CRP) services, as well as services to underserved populations and individuals with the most significant disabilities. Often, CRPs act as an extension of the public VR agency and have the potential to provide critical input into the current landscape of the VR service provision process.

To obtain this information, KYOVR surveyed CRPs regarding service needs and trends relative to their respective viewpoint. KYOVR maintains a database with listings of contact information for all of the

agencies authorized to provide CRP services with the agency. Using the information from this database, the CRP online survey was dispersed electronically, via email. As with previous surveys, the email included a web link to the survey, along with an explanation of the purpose of the study, instructions for completion, assurances of confidentiality and dates the survey would be available. Each agency was to designate one respondent to the survey and it was requested that only one response be provided from each agency. The survey was available between January 22, 2018 and March 16, 2018.

The CRP survey asked for some categorical information, such as: annual KYOVR referrals, agency years of service to KYOVR, number of employees, and the primary KYOVR district served. Consistent with the public and KYOVR staff surveys, a list of VR services was provided and respondents were asked to indicate whether the need for these services was met, somewhat met, or unmet. Next a list of KYOVR services were given and they were asked to rate their knowledge of those services.

Respondents were then presented with a list of potential barriers to employment for individuals with disabilities and asked to utilize a Likert scale to rate the significance of the barrier. The survey also asked about current services and process trends. The CRPs were asked to indicate the percentage of time devoted to various direct VR services by CRP staff. The providers were also asked to estimate the time period to initiate services after referral and whether they had a waiting list for any of their rehabilitation related programs. In terms of population served, CRPs were provided a list of groups/disability populations and asked to indicate whether there had been an increase, decrease, or no change in the incidence of these disabilities in the consumers they served in the past three years.

The CRPs were provided a list of traditional CRP related VR services and asked to state whether their agency anticipated an increase, decrease, or no change in the demand for services for these services in the next three years and if there were any additional services that were needed, but not currently being provided. A list of issues related to inefficient operation of a CRP (lack of referrals, employee turnover, etc.) was provided and the respondent was asked to identify the specific issues significantly impacting their ability to provide services to individuals with disabilities.

In relation to Section 511 of WIOA, it was asked whether the agency was a 14C certificate holder, and their current knowledge about this legislation. In summary, they were asked to list their agency if they had a need for further training. The CRP survey was sent to the 54 CRPs authorized as vendors for KYOVR or KYOFB with 34 actually initiating and completing the survey, for a 63% completion rate. Of the respondents, 53% (18) had provided services to KYOVR or KYOFB consumers for five years or less and 21% (7) had provided services for more than 20 years. When inquired, 38% (13) of the respondents stated their agency received less than 10 referrals per year. In regards to size of the agency, 53% (18) had less than 10 staff and 21% (7) reported more than 50 employees. Based on the fact that there was at least 1 response in all choices of the demographic questions it was felt that a variety of CRPs are represented in the survey responses.

According to CRPs who completed the survey most time is spent in the areas of counseling, instructing, and planning prior to placement. 88% stated they initiate services in two weeks or less. 76% state they do not have a waiting list. They indicated that the issues impacting CRP services are the: lack of available resources (grants, contracts, etc.), and low Kentucky OVR fee for service rates.

When asked what other services are needed, which are not provided by KY OVR, they most often stated gas/transportation (mentioned five times). Other services mentioned were further training for work skills or life skills (mentioned 3 times); waitlist affecting referrals (mentioned twice), and Pre-ETS issues (twice). When asked to identify populations with an increase in the last three years they indicated those with mental illness, learning disability, persons with most-significant disabilities and Autism.

CRPs were asked to identify areas of ‘unmet need’ for their consumers. They indicated support services, mental health treatment and post-employment services were all ‘unmet needs’. When asked what CRP services they foresee an increase in the next 3 years they indicated Employment and retention, skills training and customized supported employment.

A few trends are worth noting when analyzing the CRP Survey. It appears that most CRP’s initiate services soon after receiving a referral. However, they indicate the need for more resources to fund their agency. They also indicated that consumers could use more resources in the area of transportation funding. It appears most are small agencies and don’t usually make a referral for VR services yet they receive most of their referrals from OVR/OFB. Although they don’t know a lot about Assistive Technology but have more knowledge in their areas of expertise — job placement and supported employment.

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 .

Transition services continue to be an unmet need among individuals with disabilities. What do students with disabilities need prior to exiting high school to be successful post-high school? Seems like a simple question with a simple answer, much like the basic mathematical equation $A+B=C$.

Unfortunately, this question is complex, subjective, multi-layered and by no means is there a one-step process for all students with disabilities to follow in order to leave high school fully prepared for post-secondary life. Vocational Rehabilitation plays a vital role in this abstract equation in preparing students and collaborating with local school districts in fulfilling their No Child Left Behind (NCLB, 2004) college and career readiness obligations. Following the directives of the Workforce Innovations and Opportunity Act (WIOA, 2014) VR is partnering and collaborating with local school agencies to build the necessary bridge for students to cross from school life to post-school life.

The National Center for Education indicated in 2014-15, 13 percent of all public school students were receiving special education services. Current Kentucky Department of Education 2016-17 data indicates Kentucky has 24,919 transition students with Individualized Education Plans ages 14-21. Five hundred students with IEP’s ages 14-21 dropped out. 8,536 students in Kentucky dropped out (1.3% of the total population 656,588), so approximately 5.86% of the dropout population had an IEP. Roughly 2.01% of the students with IEPs ages 14 — 21 dropped out.

Census.gov indicates in 2016, KY Sex by age by disability status — 2012-16 American Community Survey 5 year estimates:

5 to 17 years 277,218 with a disability 34,125

18-34 years 478,175 with a disability 43,545 E

employment status for Kentucky, civilian noninstitutionalized population 18-64 years Source: Source: U.S. Census Bureau, 2011-2013 3-Year American Community Survey 2011-13 American Community Survey 3 year estimates:

2013, in the labor force 1,940,589 with a disability 110,511 Unemployed 180,638 with a disability 26,032

Not in labor force 747,405 with a disability 284,509

WIOA allows KY OVR to address these particular issues by allocating funds for pre-employment transition services. WIOA mandates 15% of all federal funds be set aside to provide pre-employment

transition services. Indications of post-school success are broken into categories in 'Predictors of Post-School Success in Taxonomy 2.0. (Test, et al., 2009) clearly noting areas where Vocational Rehabilitation may play vital roles. The predictors are (possible VR role in parentheses): Student Development (assessment, employment skills attainment, supports), Student-focused planning (IEP development and IPE participation), and Family engagement (family involvement, family empowerment, and family preparation), Program Structures (strategic planning, high expectation, and high involvement), Interagency Collaboration (collaborative framework, and collaborative service delivery).

2017 Kentucky Post School Outcome data shows that of the 2,438 respondents to their one year out survey to students with disabilities (a student with an Individualized Education Plan) one year post high school exit, 31.1% had neither employment or nor were they attending any post-secondary education program.

Transition services were identified as an 'unmet need' as evidenced by a rating average of 2.03 (out of 3.0) according to respondents of the public survey with '3' indicating the greatest need. The results of the Comprehensive Needs Assessment survey in 2018 still indicated an 'unmet need' of transition services, similar to the previous surveys. In 2018, similarly, 35.7% completing the public survey indicated the need was unmet. Similarly, CRP's and VR counselors also indicated transition services as a significant need with 74% of counselors indicating it was an unmet need and a rating of 2.7. k. Annual Estimates Describe: 1. The number of individuals in the State who are eligible for services;

According to data from the 2016 American Community Survey (ACS), published in the annual Compendium of Disability Statistics, 17.02% of Kentucky civilians living in the community report having a disability. This is up from 2015 when it was 17%. Overall, this rate has remained pretty steady since 2013. It was lowest in 2013 at 16.8%. It was highest in 2016 at 17.2%. From 2013 to 2016, this represents an average change of about 0.2%. According to this resource, Kentucky's overall population is 4,342,711 people. Using the percentage in 2016 and applying it to the population numbers, there is an estimated 777,345 people in the state of Kentucky who have a disability as of 2016. , including 15.5% of the overall rate of individuals with a disability in the United States is 12.6%. It has been holding steady from 2013-2015 (10.5% working age) in 2015. The rate in Kentucky is higher than the rate nationally. The percentage of residents of working age (18-64) in Kentucky who are employed is 27.4%. The national average was 34.9% in 2015. In this instance of employment, the rate in Kentucky is lower than the rate nationally.

K. ANNUAL ESTIMATES

Describe:

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

According to data from the 2016 American Community Survey (ACS), published in the annual Compendium of Disability Statistics, 17.02% of Kentucky civilians living in the community report having a disability. This is up from 2015 when it was 17%. Overall, this rate has remained pretty steady since 2013. It was lowest in 2013 at 16.8%. It was highest in 2016 at 17.2%. From 2013 to 2016, this represents an average change of about 0.2%.

According to this resource, Kentucky's overall population is 4,342,711 people. Using the percentage in 2016 and applying it to the population numbers, there is an estimated 777,345 people in the state of Kentucky who have a disability as of 2016. , including 15.5% of the overall rate of individuals with a disability in the United States is 12.6%. It has been holding steady from 2013-2015 (10.5% working age) in 2015. The rate in Kentucky is higher than the rate nationally. The percentage of residents of

working age (18-64) in Kentucky who are employed is 27.4%. The national average was 34.9% in 2015. In this instance of employment, the rate in Kentucky is lower than the rate nationally.

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

A. THE VR PROGRAM;

The following data that represents estimated performance for FY 2019 under this State Plan based on historical data from prior years. The estimated service and category numbers are reflective of the average number of new applicants that we expect to receive in 2018 and it is inclusive of the carryover of consumers from the prior year.

The following information reflects the estimated numbers taking into consideration that in FFY 2019 Category One is the only category open and staffing levels were decreased.

Estimated number to be served in 2019 under the combined agency is 25,500 with 3,030 positive employment outcomes. The number for FY 2019 year takes into account that only Category One will remain open for the program year for the Combined Agency. Included in the estimated amounts are services needed by any eligible individual who began to receive services under an individualized plan for employment prior to the effective date of the order of selection, respective of the severity of the eligible individual's disability; and individuals requiring post-employment services.

B. THE SUPPORTED EMPLOYMENT PROGRAM; AND

OVR as a Combined Agency for Program Year 2019 estimates that it will serve around 3,890 individuals with a total estimated associated costs of around \$5,500,000. This is an average estimated costs per person of around \$1,413.88 with 850 employment outcomes. Expenditures exceeding the Title VI-B 2019 allotment will be covered with funds from the 110 program.

OVR designates Part B of Title IV funds to serve individuals with the most significant disabilities as further reflection of the Office's continued dedication to serving those individuals. The estimates found in the table are based on a trend analysis of data extracted from RSA data, and KYOVR expenditure data from fiscal years 2017—2018. Policies, practices, and priorities potentially influencing expenditures were considered in the development of these estimates.

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

OVR is under an order of selection with only Category One open. Included in the estimated amounts are services needed by any eligible individual who began to receive services under an individualized plan for employment prior to the effective date of order of selection, respective of the severity of the eligible individual's disability; and individuals requiring post-employment services.

July 1, 2018 through June 30, 2019 The estimated number to serve under Category One is 18,293 with 2,095 successful employment outcomes.

The estimated number to serve under Category Two is 4,238 with 628 successful employment outcomes.

The estimated number to serve under Category Three is 2,804 with 273 successful employment outcomes.

The estimated number to serve under Category Four is 165 with 34 successful employment outcomes.

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

As of October 1, 2018, there are no individuals on the waitlist. OFB and OVR made the decision to serve all individuals on the waiting list prior to the effective date of merger October 1, 2018.

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

The costs are reflective of the actual direct service cost to consumers for the program year July 1, 2017 through June 30, 2018.

2019

Category One Estimated to be served — 18,293 Total Estimated Associated Costs - \$5,250,400 Average Estimated Costs per person per closure - \$2,506.16 Estimated Employment Outcomes — 2,095

Category Two Estimated to be served — 4,238 Total Estimated Associated Costs - \$138,260 Average Estimated Costs per person per closure - \$220.16 Estimated Employment Outcomes - 628

Category Three Estimated to be served — 2,804 Total Estimated Associated Costs - \$70,500 Average Estimated Costs per person per closure - \$258.24 Estimated Employment Outcomes - 273

Category Four Estimated to be served - 165 Total Estimated Associated Costs — \$10,000 Average Estimated costs per closure: \$294.11 Estimated Employment Outcomes: 34

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.

Kentucky on October 1, 2018, integrated into a single vocational rehabilitation program the following programs that are operated under the federal Rehabilitation Act of 1973 (29 U.S.C. Sections 720 through 751): (1) the vocational rehabilitation program for individuals with visual impairments; and (2) the vocational rehabilitation program for individuals with other disabilities. The 2018 CSNA was conducted jointly by both agencies with input from both State Rehabilitation Councils of the respective agencies. This plan contains goals and priorities based on the identified needs through the FFY 2018 Comprehensive Statewide Needs Assessment (CSNA) for the newly Combined Agency.

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

Vocational Rehabilitation Program Goals

Goal 1: Recruit, employ, retain the most qualified and highly skilled rehabilitation staff which reflects employment focused, job driven outcomes.

Objective: Examine staff patterns and service capacity in order to effectively deliver quality vocational rehabilitation services.

Measures: Increase staff retention rates by 10%

Goal 2: Develop and implement training that adequately address the needs of staff under WIOA and changes to policies and procedures under the combined agency.

Objective: Develop and deliver identified training to staff that aligns with a shared vision and mission of the combined agency.

Measures: needs assessment completed of staff training delivered on WIOA of staff training delivered relating to policies and procedures

Goal 3: Develop the policy and procedures manual, Service Fee Memorandums, and other written materials to be concise, accurate, and accessible in order to support staff, eliminate confusion, and improve the function of the combined agency.

Objective: Ensure the provision of consistent and quality services for individuals with disabilities in the Commonwealth.

Measures: Completion of the combined policies and procedures manual

Revision and Implementation of Service Fee Memorandums All materials produced in accessible formats

Goal 4: Effectively utilize staff and fiscal resources in order to provide statewide services to all eligible consumers and increase competitive integrated employment outcomes.

Objective: Open categories under Order of Selection

Measure: Elimination of the waiting list by category

Measure: Serve open categories keeping with the OOS policy Objective: Expedite services in order to increase outcomes Measure: Average time between eligibility and plan reduction of 10%

Measure: All applicants who receive SSA benefits will receive information on benefits planning and at least 50% of them will receive a benefits analysis.

The Kentucky Office of Vocational Rehabilitation set the following goals for the distribution of Title VI, Part B Funds.

Goal 1: Increase the number of CRP's providing Supported Employment Services

Strategies: Recruit more providers for supported employment by holding outreach opportunities for potential providers and support providers for unserved and underserved areas;

Measure: Increase in the number of providers (5%)

Goal 2: continue to monitor and explore additional strategies to improve CRP service quality and compliance

Strategies: Involve job coaches with transition students by the last semester of school;

Strategies: Train staff on new policies related to customized employment and person—centered planning;

Strategies: Require notes to be submitted by Supported Employment Providers by the 5th day of each month.

Strategies: Continued monitoring by the Section 511 Implementation Team to insure agency compliance to WIOA requirements related to OVR relationships with sheltered workshops;

Goal 3: Seek alternative strategies for providing and funding Long Term Support Services.

Strategies: Gather input from staff, education partners, and service providers, individuals with disabilities, their families and other stakeholders.

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

The 2018 CSNA WAS conducted jointly by both agencies with input from both State Rehabilitation Councils of the respective agencies. The plan contains goals and priorities based on the identified needs through the FFY 2018 Comprehensive Statewide Needs Assessment (CSNA). The purpose of this Comprehensive Statewide Needs Assessment (CSNA) is to assist in that effort, by providing a base of evidence on which priorities, goals and strategic planning can be developed.

The Rehabilitation Act of 1973 was amended by the Workforce Innovation and Opportunity Act (WIOA), and signed into law on July 22, 2014. WIOA mandates that each state and its State Rehabilitation Council (SRC) conduct a comprehensive statewide assessment every three years. This study examines the rehabilitation needs of Kentucky residents with disabilities. In addition, we seek to clarify the needs of individuals with the most significant disabilities, minorities, individuals who have been unserved and underserved, individuals with disabilities served through other components of the statewide workforce development system, and youth and students with disabilities and the need to establish, develop or improve community rehabilitation programs.

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

This 2018 Comprehensive Statewide Needs Assessment informs the Office of Vocational Rehabilitation strategic and state plans; meets the Federal regulatory requirements of 34 CFR §361.29; and provides vital information on the State VR program which is used by both public and private disability advocacy agencies. The State Rehabilitation Councils along with the Office for the Blind and Office of Vocational Rehabilitation worked collaboratively to assess the needs of individuals with visual disabilities.

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

OVR and OFB will be submitting the first WIOA annual Performance Report on October 1, 2018 along with the other partners.

Kentucky is committed to acquiring a system that gathers the collective data required under section 116 of WIOA for all the core partners. Currently, Kentucky is developing a system through Salesforce called KEE Suite that will collect, track, measure and report data from the workforce partners. The workforce partners use different systems and tracking mechanisms. The new system will be developed in phases, bringing the workforce partners into the system in a tiered manner, identifying needs and developing processes to meet the needs for each partner. The current Kentucky OFB/VR Case Management System (CMS); will be maintained and improved upon until the time that the new workforce system is fully implemented.

Additionally, the Education and Workforce Development Cabinet, Department of Workforce Investment is working with other systems to work in cooperation with and complement the KEE Suite system. These systems include Workforce Connect and SARA. Workforce Connect is being implemented in phases. SARA is currently being piloted in one region of the state. Kentucky Skills Network partners access the Customer Relationship Management system based on a Salesforce platform. This system, utilized by the partners to collect and report Employer information and reports. We continue to evaluate this process for possible improvements.

The new system(s) should allow OVR/OFB to have paperless cases, electronic signatures, improved reporting access, increased electronic communication and corroboration among Department partners, and system generated notifications and reminders to increase productivity.

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.

OVR and the State Rehabilitation Council examined a number of statistics, estimates and internal program data from our Case Management System as well as other documents and publications.

These included:

Comprehensive Statewide Needs Assessment State Plan Annual Report Strategic Plan Satisfaction Survey of Closed Cases (successful and unsuccessful) Caseload Statistics Prior performance on the standards and indicators OVR was last monitored in 2009 and all findings and recommendations from those monitored activities under section 107 have been addressed or resolved.

M. ORDER OF SELECTION

Describe:

1. WHETHER THE DESIGNATED STATE UNIT WILL IMPLEMENT AND ORDER OF SELECTION. IF SO, DESCRIBE:

A. THE ORDER TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES.

The Rehabilitation Act of 1973, as amended, requires an Order of Selection of individuals to be served, ensuring that individuals who have the most significant disabilities will be given first priority whenever all eligible individuals who apply cannot be served.

The order of selection gives first priority to those individuals with the most significant disabilities as defined by OFB. The criterion to determine individuals with the most significant disabilities and the subsequent order of categories to be followed in selection of individuals to be provided services, is based on a refinement of the criteria set forth in the definition of individual with a significant disability, specifically, the degree by which an individual's impairment seriously limits his or her functional capacities and the number of rehabilitation services needed by an individual.

The initial date for implementation of Order of Selection for OFB was January 1, 1995. There were Five Priority Categories with only eligible individuals in Priority Categories One through Four being served. The effective date was May 4, 2007 for additional changes to Order of Selection. During the 2003 site monitoring with RSA, OFB staff consulted with RSA representatives on the Order of Selection and the need for regulatory changes. Category Five was removed and definition changes were made to Categories One through Four refining the criteria to be closely aligned with the federal policy.

OVR initially entered Order of Selection (OOS) in FY1983 with nine categories and eventually reduced the number of categories to 6 that same year. The agency closed and reopened various categories from 1983—1994, serving as few as three categories and as many as five categories. In 1996, the agency revised the categories for OOS, emphasizing functional limitations and removing a category for public officers injured in the line of duty, while still maintaining 6 categories. Based on information received from the SRC and public forums, the agency had 4 open categories and one closed. In 2009, the agency revised OOS combining the last 2 categories to include all individuals with disabilities considered to be non—significant in terms of functional limitations in regard to the individual's ability to work and live independently. Because of cuts in state funding, the agency reviewed the available data and determined the agency would only serve priority categories 1 and 2 on January 4, 2010. On FY2011, the agency made the decision to reopen Category 3 and to serve all

eligible individuals on the waitlist. As stated, beginning in FY 2010, budget reductions left the agency unable to match all available federal funds.

Because of this reduction in funds, OVR continued to experience difficulty in providing VR services to all eligible Kentuckians with disabilities. Information was also presented annually to the SRC and the public during the public meeting seeking input regarding OVR services and feedback from both the SRC and the public regarding the number of categories served in Order of Selection. The decision was made to close categories 2 and 3 on July 1, 2016. For the two years joint meetings occurred monthly as well as weekly with leadership from the Education and Workforce Development Cabinet, agency staff and the State Advocacy Organizations. The major work of the group was to create a consistent regional and management unit structure. Additionally, workgroups were formed to work on the consolidation of policies for the provision of vocational rehabilitation services under a combined agency and the redesign of systems and processes to achieve greater efficiency. Both agencies had their own policies for OOS with OVR having five categories and OFB four. This required collaborative work from the leadership of both agencies. From May 28 — June 15 there were ten public hearings scheduled throughout the state. Content was presented on the organizational plan and structure and Order of Selection. Policies were posted on the website.

Beginning October 1, 2018 OVR will have four priority service categories with Priority Category One open and Two, Three and Four Closed. The following is Kentucky's order of selection for the combined agency:

Category 1: Eligible individuals who have the most significant disabilities and require a minimum of two services one of which meets an expanded definition.

Category 2: Eligible individuals with significant disabilities who have limitations in two (2) major areas of functional capacities and require a minimum of two services one of which meets an expanded definition (closed).

Category 3: Eligible individuals with significant disabilities who have limitations in on (1) major areas of functional capacities and require a minimum of two services one of which meets an expanded definition (closed).

Category 4: consumers with a non-significant disability without functional limitations or who do not require two or more services (closed).

For FFY 2019, priority category 1 only will receive services under the order. KYOVR will continually monitor influencing factors to determine if individuals on the waitlist (priority categories 2 through 4) are to receive services. Should funds become available, the Office may re-open services to closed priority categories.

Kentucky Office of Vocational Rehabilitation will first serve those individuals on the waitlist on a first-applied, first-served basis, as established by the date of application. In cases where more than one priority category is opened, preference will be given to the higher priority category group based on significance of disability.

POLICIES: OVR has been and will continue to operate under an Order of Selection due to limited resources and will continually evaluate need, funding, and priority categories. Within the Order of Selection the office will continue to accept referrals of and applications from individuals with disabilities. The Order of Selection will in no way regulate the provision or authorization of an assessment for determining eligibility. Any individual who has begun to receive services under an Individualized Plan for Employment will in no way be affected by an Order of Selection. The Order of Selection policy will permit immediate reclassification into a higher category, with Priority Category I being the highest category, whenever circumstances justify the reclassification.

B. THE JUSTIFICATION FOR THE ORDER.

OVR utilizes a multimodal approach to assessing the resources available to allow the agency to provide vocational rehabilitation services to all eligible individuals who apply, such as:

Population data related to disability incidence Short and Long—term budgetary outlook Short and Long—term staffing projections Comprehensive Needs Assessment Waiting list for services VR Counselor Caseload size and expenditures. SRC input Public Forum Input

The agency carefully analyzes information from these sources to predict its ability to provide quality services to eligible individuals with disabilities as required by the Rehabilitation Act of 1973 as Amended. OVR will continually monitor influencing factors to determine if individuals on the waitlist will be served in FY2018 and beyond.

According to data from the 2012 American Community Survey, published in the annual Compendium of Disability Statistics, 17.0% of Kentucky civilians living in the community report having a disability, including 15.5% of residents of working age (18—64). This is higher than the national average (12.3% all, 10.2% working age). The rate of Kentuckians reporting a disability remained relatively stable from 2011 through 2012, growing at 1.1% (on par with the national average of 1.2%). Only 27% of individuals in Kentucky with disabilities are employed. Kentucky and Arkansas share the second highest percentage of individuals with disabilities. Kentucky also shares a second place ranking with Arkansas and Louisiana in percentage of individuals who fall below the poverty line at 17.3%. According to the Social Security Administration, 192,721 Kentuckians receive blind and disabled Supplemental Security Income benefits. The Institute for Community Inclusion (ICI), in 2007, reported the percentage of SSI recipients in Kentucky who were working was 2.7% compared to the national percentage of 7.6% (ICI, 2007). In 2007, Kentucky also had 160,122 Old Age Survivor and Disability Insurance (OASDI) recipients/workers with disabilities. These statistics provide a description of the potentially high demand for OVR services based on the number of individuals in the state with disabilities.

In FFY 2018 and year to date FY2019, agency staff along with fiscal staff from the Fiscal Integrity Unit and the SRC reviewed on a quarterly and often monthly basis data on numbers served, the number placed on a waiting list, and agency fiscal resources to determine the need to open or close categories. During FFY 2017 and year to date in 18 budgets and fiscal resources were reviewed monthly by the agency Executive Leadership Team (ELT). Information was presented to the State Rehabilitation Council at each meeting.

In 2018 OVR continues its efforts in maintaining administrative costs to a minimum and implementing additional cost—saving measures. The decision was made to keep only Priority Category One Open. In FFY 2018 OVR relinquished \$5 million in federal funds due to being under match and penalties for not maintaining the state effort. Another factor for us to consider is the pension crisis in Kentucky and the resulting rising costs to fund the pension.

C. THE SERVICE AND OUTCOME GOALS.

The numbers below outline the current service population numbers and costs. Service Numbers and costs for 2019 and 20 and are estimated based on current numbers year to date from queries run in the Case Management System (CMS). Included in the estimated amounts are services needed by any eligible individual who began to receive services under an individualized plan for employment prior to the effective date of the order of selection, irrespective of the severity of the eligible individual's disability; and individuals requiring post—employment services. FY 2019 Included in the estimated amounts are services needed by any eligible individual who began to receive services under an individualized plan for employment prior to the effective date of the order of selection, irrespective of the severity of the eligible individual's disability; and individuals requiring post—employment

services. The estimated year end actual outcomes and costs for 2019 for July 1, 2018 through June 30, 2020 to match the new federal year under WIOA for quarterly reporting are as follows:

The following FY 2019—2020 estimates are based on a trend analysis of data from the previous years, adjusted to account for the current OOS and anticipated and historic changes in various environmental factors such as budget, personnel, etc.

FY 2019 SERVICE GOALS and OUTCOMES: Priority Category I Active Cases GOAL: 18,293 Outcomes GOAL: 2,095

Priority Category 2 Active Cases GOAL: 4,238 Outcomes GOAL: 628

Priority Category 3 Active Cases GOAL: 2,804 Outcomes GOAL: 273

Priority Category 4 Active Cases GOAL: 165 Closed Outcomes GOAL: 34 TOTAL Active Cases GOAL: 25,500 Outcomes GOAL: 3,030

SERVICE COSTS ESTIMATE FY 2019: 18,500,500 * Includes Case Service, Guidance and Counseling, Public Community Rehabilitation Programs and Placement Costs

FY 2020 SERVICE GOALS:

Priority Category I Active Cases GOAL: 18,132 Outcomes GOAL: 2,223

Priority Category 2 Active Cases GOAL: 4,150 Outcomes GOAL: 598

Priority Category 3 Active Cases GOAL: 2,770 Outcomes GOAL: 256

Priority Category 4 Active Cases GOAL: 150 Closed Outcomes GOAL: 25 TOTAL

Active Cases GOAL: 25,202 Outcomes GOAL: 2,996

SERVICE COSTS ESTIMATE FY 2020: \$18,250,000 * Includes Case Service, Guidance and Counseling, Public Community Rehabilitation Programs and Placement Costs Estimated number of individuals entering services in 2018 with individualized plans for employment= 8,261 Total Estimated Costs: \$4,402,337 Estimated number of individuals determined eligible entering services in 2019 = 26,038 Total Estimated Costs: \$32,331,101.69 Total Projected Services and Administrative Costs inclusive of facilities, salaries, benefits, outreach activities, and required statewide studies: \$52,215,234.76

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

2019 YEAR END ESTIMATED OUTCOMES AND COSTS 7/1/18 THROUGH 6/30/19 2020 YEAR END ESTIMATED OUTCOMES and COSTS 7/1/19 through 6/30/20

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

Once eligibility is determined, the significance or non-significance of the disability must be established. As part of the eligibility decision, the counselor determines whether the individual has a physical or mental impairment or combination of impairments that seriously limit one or more functional capacities in terms of employment outcome. In order to be considered significantly disabled, an individual is expected to require multiple vocational rehabilitation services one of which is assumed to be vocational rehabilitation counseling and guidance. At least one additional service must be required as defined by the definition of expanded services. Expanded services are those services required as the result of a disability (ies) to circumvent, minimize, or alleviate barriers to employment but, due to their intensity, duration, or complexity, go beyond the routine services normally required for that disability.

Presumption of Eligibility for Social Security Recipients and Beneficiaries means that an individual who has been determined eligible under Title I or Title XVI of the Social Security Act is:

Considered to be an individual with a significant disability; and

Presumed to be eligible for vocational rehabilitation services under Title I (provided the individual intends to achieve an employment outcome consistent with the unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice of the individual) unless the office can demonstrate by clear and convincing evidence that such individual is incapable of benefiting from vocational rehabilitation services in terms of employment outcome due to the severity of the disability of the individual.

If the Executive Director and State Rehabilitation Council determine that the agency lacks available funds to serve all consumers, the office shall follow an order of selection to give priority for services according to a ranking of categories of consumers based on the severity of the disability. The Executive Director of the Office of Vocational Rehabilitation shall direct the order of selection by designating in written memorandum, the priority categories to be served.

Order of Selection will not use any of the following factors in determining eligible individuals Residency duration, type of disability; age, gender, race, color, or national origin, source of referral, type of expected employment outcome, need for specific services or anticipated cost of services, or the income level of the individual or its family.

The order of selection shall be implemented on a statewide basis.

The order of selection shall be implemented to assure that eligible individuals with the most significant disabilities are provided services before other eligible individuals.

The order of selection shall not affect: The acceptance of referrals and applicants; the provision of assessment services to determine whether an individual is eligible for vocational rehabilitation services, and the individual's priority under the order of selection; services needed by any eligible individual who has begun to receive services under an individualized plan for employment prior to the effective date of the order of selection, irrespective of the severity of the eligible individual's disability; and individuals requiring post-employment services. The office will ensure that all funding arrangements for providing services under the State plan, including third-party arrangements and awards under the establishment authority, are consistent with the order of selection.

An eligible individual shall be immediately reclassified into a higher priority category whenever appropriate justification exists in the case record of the individual.

The office shall conduct an assessment to determine whether an individual is eligible for vocational rehabilitation services and the individual's priority under the order of selection. The VR Counselor determines the eligibility of the individual and their priority category based on a review of the data from the assessment.

In the order of selection each eligible individual within a closed priority category shall be placed on a waiting list until such time as the priority category is opened. The process for the waiting list is as follows:

Once an individual has been determined eligible within a closed priority category by the Vocational Rehabilitation Counselor the individual will receive notification through the counselor in writing of:

Their assignment to a particular category;

The priority categories currently being served;

Their right to appeal their category assignment and the availability of the Client Assistance Program (CAP); Information and referral services; and

They are given the option to be placed on a waiting list by date of application until such a time the priority category can be opened and the individual employment plan can be developed and initiated.

The waiting list will be maintained by the Director of Field Services.

The waiting list will be reviewed quarterly by the Director of Field Services and Regional Managers.

Consumers will be contacted annually to inform them the status of Order of Selection and their specific priority category. Additional information (I & R) will be given. The consumer will be asked regarding their preference for remaining on the waiting list.

At the time when funds become adequate and a priority category will be opened the following sequence of action will occur for those individuals in a closed category:

Priority Category Two (2) will be opened and individuals on the waiting list will be served by date of application. The office will assure that eligible individuals, who do not meet the order of selection criteria for the priority categories, shall have access to services provided through the information and referral system in accordance to the 1973 Rehabilitation Act. These services will include referral to other Federal and State programs including the statewide workforce investment programs. The process for this is as follows: The agency will provide the individual with a notice of referral; The notice will contain a point of contact for the program or service an individual is being referred to and; any relevant information regarding services for the individual relating to the preparation, securing, obtaining or retaining of employment; and documentation of the nature and scope of information and referral services provided will be included in the individual service record and entered in the Case Management System (CMS).

Individuals who are presumed to be significantly disabled because they receive SSA benefits will be further assessed to determine if they meet the agency's criteria for "individual with a most significant disability."

Consumers making the decision not to be placed on a waiting list after they receive notification of their priority category will be closed. They will receive notification from their VR Counselor that their case will close and of their right to appeal the agency's decision, including information on how to contact CAP. The notification will include information on how they may reapply for services in the future if their circumstances change or if the agency makes changes to order of selection.

When a request for services by an eligible individual is affected by the order of selection, the individual shall be immediately notified of such in writing, and provided with information on procedures for individual rights for appeal, and how the Client Assistance Program may provide help in the process.

Quarterly, the Executive Director, State Rehabilitation Council and Executive Leadership Team along with fiscal staff will reevaluate the agency circumstances to determine whether or not the agency's resources are sufficient in serving all individuals or there is a need to implement, establish or make changes in order of Selection. At such time that the agency finds that it is able to serve those individuals in any closed priority category, that category will be re-opened. If the Agency finds that they have the resources to serve some individuals but not all individuals in a priority category the date of application will be utilized as a criterion for ranking individuals within a priority category. The timeline for this would be a year, unless the agency's financial situation should change drastically. Circumstances that would allow this to occur include a decrease in the number of referrals or other sources that would result in additional funds, which could be utilized to serve these individuals.

When a priority category is to be opened for services, the Executive Director shall issue an implementing memorandum to staff, with instructions that appropriate services delayed under the order of selection may be provided.

2. IF THE DESIGNATED STATE UNIT HAS ELECTED TO SERVE ELIGIBLE INDIVIDUALS, REGARDLESS OF ANY ESTABLISHED ORDER OF SELECTION, WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT.

The State has not elected to serve eligible individuals regardless of any established 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.

The Office of Vocational Rehabilitation is committed to the principle that individuals with the most significant disabilities (MSD), including those who have not traditionally experienced competitive work, are capable of engaging in employment in integrated settings. The agency and State Rehabilitation Council have agreed upon the goals and priorities in this section for Supported Employment. The goals and priorities in this section reflect the commitment of OVR to increase competitive integrated employment outcomes for individuals who are blind through supported employment. Based on the information gathered and analyzed from the comprehensive statewide needs assessment conducted in FFY 2018, the Agency's performance, the 107 monitoring report, real time data from the case management system, the Strategic Planning process and other sources of information the following goals for the distribution of Title VI, Part B Funds were set. A review of the set goals and priorities will occur annually for any needed revisions for the State Plan. OVR will distribute funding from Title VI, Part B through its established network of Supported Employment Providers. During the program fiscal year OVR expended \$5,177,342 serving around 3,889 individuals with 849 successful closures. Yearly agreements are developed with each Supported Employment Provider. Fees—for—service and outcome fees, along with policies and procedures for each, have been developed and will be followed by each Provider. All services are monitored by the Supported Employment Branch Staff, consisting of one Branch Manager and three Supported Employment Consultants. OVR, through the Supported Employment Branch, will assure choice and quality services for its consumers served in supported employment by: a. thoroughly reviewing all applications for Supported Employment vendor ship; b. monitoring the ongoing and extended supports provided by each agency; c. verifying the provider's ability to fund ongoing supports using funds other than VR; d. conducting annual reviews of each vendor; e. being available to consult with individuals, their families, service providers, and others using person—centered planning approaches. OVR will seek to improve the competency of current and future service providers by: a. providing technical assistance and training for provider staff (through a contract with University of KY—Human Development Institute's Supported Employment Training Project); b. utilizing local teams (where appropriate) to evaluate services and plan for technical assistance; c. presenting Basics of Supported Employment regularly for agency staff orientation training (Skills Enhancement Training); and h. developing and keeping updated policy and procedural manuals on supported employment for staff via OVR Intranet, and for Providers via Internet and other means. Below are the goals for the program: The Kentucky Office of Vocational Rehabilitation set the following goals for the distribution of Title VI, Part B Funds. Goal 1: Increase the number of CRP's providing Supported Employment Services Strategies: Recruit more providers for supported employment by holding outreach opportunities for potential providers and support providers for unserved and underserved areas; Measure: Increase in the number of providers (5%) Goal 2: continue to monitor and explore additional strategies to improve CRP service quality and compliance Strategies: Involve job coaches with transition students by the last semester of

school; Strategies: Train staff on new policies related to customized employment and person—centered planning; Strategies: Require notes to be submitted by Supported Employment Providers by the 5th day of each month. Strategies: Continued monitoring by the Section 511 Implementation Team to insure agency compliance to WIOA requirements related to OVR relationships with sheltered workshops; Goal 3: Seek alternative strategies for providing and funding Long Term Support Services. Strategies: Gather input from staff, education partners, and service providers, individuals with disabilities, their families and other stakeholders.

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

The provision of extended services for a period not to exceed 4 years

Extended Services are those services provided to individuals with the most significant disabilities, which may include youth with the most significant disabilities. Services may be provided by the State agency, a private nonprofit organization, employer or any other appropriate resource when the individual no longer receives support services from the agency. OVR will determine the need for and fund services on a case-by-case basis dependent upon each individual's need for services.

OVR will reserve and expend half (50%) of the State's allotment for the provision of supported employment services and extended services to youth with the most significant disabilities. Extended services will be available for youth without delay for a period not to exceed four years or until the youth no longer meets the definition of a "youth with a disability". OVR will work with providers to ensure another source of extended services is available so there will be no interruption of services for individuals with significant disabilities.

The Office will collaborate with the Department of Behavioral Health, Developmental and Intellectual Disabilities (DBHDID) to expand supported employment options to not served and underserved groups, as well as youth with most significant disabilities without delay.

Extended Services are those services provided to individuals with the most significant disabilities, which may include youth with the most significant disabilities. Services may be provided by the State agency, a private nonprofit organization, employer or any other appropriate resource when the individual no longer receives support services from the agency. OVR will determine the need for and fund services on a case-by case basis dependent upon each individual's need for services.

OVR will reserve and expend half (50%) of the State's allotment for the provision of supported employment services and extended services to youth with the most significant disabilities. Extended services will be available for youth without delay for a period not to exceed four years or until the youth no longer meets the definition of a youth with a disability. OVR will work with providers to ensure another source of extended services to available to there will be no interruption of services for individuals with significant disabilities. Collaborative Efforts include: a. participation in Commissions established as a result of state legislation, including Commission on Services and Supports for Individuals with an Intellectual Disability and other Developmental Disabilities (HB 144); Commission on Services and Supports to People with Mental Illness and Dual Diagnoses (HB 843); and the Advisory Council on Autism Spectrum Disorders; b. development of partnerships with Kentucky Medicaid Waiver Programs (Supports for Community Living, Michelle P, Home and Community Based Waivers, and Acquired Brain Injury Waivers) so that these sources of extended support funding can be fully utilized; and c. utilization of interagency workgroups to develop better understanding and expand awareness of work incentives (such as in SCL Waiver, Social Security, etc.). d. developing and implementing the IPS Supported Employment programs for consumers with severe mental illness within the community mental health centers.

B. HOW THE STATE WILL LEVERAGE OTHER PUBLIC AND PRIVATE FUNDS TO INCREASE RESOURCES FOR EXTENDED SERVICES AND EXPANDED SUPPORTED EMPLOYMENT OPPORTUNITIES FOR YOUTH WITH THE MOST SIGNIFICANT DISABILITIES.

The Office will seek to expand services to not served and underserved counties as well as not served and underserved disability groups, including youth with the most significant disabilities and will encourage continuous improvement in supported employment by monitoring the state fiscal climate for opportunities to partner with KY APSE (Association for Persons in Supporting Employment First) to advocate for increased state funding for extended support services. OVR will continue to maximize existing dollars for extended support services through collaborative agreements and contracts, increasing knowledge of Kentucky's plan for self-determination strategies, especially within the Medicaid Waiver (Supports for Community Living, Michelle P) programs, continuing partnerships with local Community Mental Health Centers, recruiting new Providers, provide training and technical assistance to new supported employment agencies, and providing consultation and technical assistance to OVR staff and providers as needed, researching better ways to fund and/or deliver services. Currently, meetings are ongoing with the Department of Behavioral Health and Developmental and intellectual Disabilities to strengthen the partnership by leveraging funding to expand IPS SE services in unserved areas, as well as exploring possibilities of implementing IPS services for individuals with intellectual disabilities, which would be one of the first endeavors for this evidenced based practice.

O. STATE'S STRATEGIES

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. THE METHODS TO BE USED TO EXPAND AND IMPROVE SERVICES TO INDIVIDUALS WITH DISABILITIES.

The strategies included in this section were developed for the established goals and priorities. Goals are assigned to an OVR Administrator or work group to assure that each strategy action step is carried out and goals are met. The designated staff person or work group will report quarterly on a grid for each goal strategy. A quarterly report will be compiled of the results of the steps taken in meeting the set goals and reviewed by the OVR Executive Leadership Team and State Rehabilitation Council. The Council through its committees and the Executive Leadership Team will quarterly review the summarized reports monitoring the agencies performance in meeting the State Plan Goals and Priorities.

Additionally, through quality assurance processes OVR provides internal and external methods and examinations to identify areas where improvement and training are needed. Internal and external methods utilized are WEBI, Crystal Reports, Case Reviews, Satisfaction Surveys, Comprehensive Statewide Needs Assessment, the State's performance under the performance accountability measures of section 116 of WIOA and the Strategic Planning Process.

Real time data is pulled and evaluated from the Web Intelligence system (WEBI) and Crystal Reports monthly or as needed (daily, weekly). The data is reviewed for positive or negative issues and trends in services, data integrity. Any issues that arise are addressed with staff as soon as possible.

2. HOW A BROAD RANGE OF ASSISTIVE TECHNOLOGY SERVICES AND DEVICES WILL BE PROVIDED TO INDIVIDUALS WITH DISABILITIES AT EACH STAGE OF THE REHABILITATION PROCESS AND ON A STATEWIDE BASIS.

The agency currently employs ten Rehabilitation Technologists and one branch manager who provide a full spectrum of Assistive Technology (AT) services throughout the Commonwealth. Three of the ten staff are assistive technology specialists for the blind and visually impaired. The AT Branch provides a comprehensive array of services including, but not limited to, the following: assessment, referral, vehicle modifications, home modifications consultations, workplace accommodations consultation, etc. The availability of full time staff allow the opportunity for the consumer to access these services during the assessment phase, during IPE development and implementation and in the job placement phase of the case. The agency partners with the KATS Network, Kentucky AgrAbility and Protection and Advocacy to coordinate a statewide training on current best practices, emerging trends and issues related to the various aspects of assistive technology. The Summer Assistive Technology Workshops are attended by OVR staff, AT professionals, educators, Occupational Therapists, Physical Therapists and other professionals that have in interest in, or contact with AT. In FY 2013, OVR took responsibility for the administration of the KATS Network, the Commonwealth's Assistive Technology program. The KATS Network coordinates a statewide network of organizations to enhance the availability of AT devices to individuals with disabilities of any age. There are 5 Regional AT Resource Centers. These sites provide services related to: Device Demonstration, AT Loan, AT Reutilization, Training and Technical Assistance, Public Assistance. The Agency employs a KATS coordinator, and continues to seek opportunities for increased collaboration and growth among the network and OVR. The KATS Network will continue to promote the reuse and reutilization of assistive technology and durable medical equipment through CARAT (Coordinating and Assistive the Reuse of Assistive Technology, a project first funded by a grant through the Health Resource Services Administration (HRSA). The project has been extended to include the entire state. Partners include the Kentucky Appalachian Rural Rehabilitation Network, Appalachian Regional Healthcare, and The Center for Excellence in Hazard, the University of Kentucky Physical Therapy Program, the Kentucky Appalachian Rural Rehabilitation Network (KARRN), the Carl D Perkins Vocational Training Center, Spalding University in Louisville, HDICATS in Lexington, and Lourdes Hospital in Paducah. The agency will continue to seek to expand its services by adding additional staff, continuing to partner with existing AT stakeholders, and increasing professional awareness of assistive technology best practices through training and presentations. The agency is also responsible for the administration of the Kentucky Assistive Technology Loan Corporation, as authorized by the AT Act. This program offers low interest loans for qualified applicants through its relationship with Fifth Third Bank. KATLC can provide loans for modified vehicles, hearing aids, adapted computers, mobility devices, augmentative communication devices or any other type of equipment or home modification that will improve the quality of life or increase the independence of Kentuckians with disabilities. The KATLC is available on a statewide basis to any qualified individual in need of AT services.

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.

OVR is committed in its effort to build the capacity to effectively serve individuals with most significant disabilities who are minorities. OVR will provide vocational rehabilitation services to all individuals who have visual disabilities who are eligible for services regardless of gender, race, national origin, religion, color, disability or age. The Agency assures the provision of services to American Indians who are individuals with disabilities to the same extent as it provides services to other significant populations or individuals.

Management and staff shall focus on the agency mission, which is competitive integrated employment, in assignment of tasks, planning and utilization of work time, initiation of self-directed work teams, and innovative projects. This includes expanding the diversity of the Agency in terms of employment

outcomes to individuals with the most significant disabilities who are minorities Staff shall ensure that persons with the most significant disabilities who are minorities will receive the same employment related services that non-minority and individuals with disabilities receive. OVR works to develop outreach activities to minorities to facilitate increased consumer referrals to the Agency. OVR encourages staff to get to know key community leaders and minority organizations to facilitate outreach. The Office follows Equal Employment Opportunity guidelines and Affirmative Action Procedures. The Office encourages existing minority staff to play an active role in policy and program development, service delivery and program monitoring activities.

The Office provides cultural diversity training to staff in order to develop a better understanding of different cultures and value systems. Staff participates in the Governor's Equal Employment Opportunity Conference and Minority Empowerment Conferences. Service demographic and population data is utilized to determine the number of minorities in regions and develop strategies to increase percentages. OVR will utilize different methods and channels of communication in targeting minority populations. This will include usage of the "Language Line" that will enable our staff to communicate with non-English speaking applicants in their native language.

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).

OVR will use a variety of methods to improve and expand VR services for students. As stated in this section internal and external methods utilized are WEBI, Crystal Reports, Case Reviews, Satisfaction Surveys, Comprehensive Statewide Needs Assessment, the State's performance under the performance accountability measures of section 116 of WIOA and the Strategic Planning Process.

OVR will use the strategic planning process as one of its methods to ensure it's effectively implementing rehabilitation programs and services to this target population. Through quality assurance processes OVR provides internal and external methods and examinations to identify areas where improvement and training are needed. OVR will utilize the case review process to Improve Professional Skills to review transition cases.

As stated earlier in this section the OVR conducts a statewide comprehensive needs assessment in order to satisfy requirements in the Rehabilitation Act of 1973, as amended. The assessment has a component that identifies additional VR service needs of both students and youth. A part of the assessment is tailored to this population to identify emerging needs. Information gained through this process is then analyzed to develop conclusions and potential action strategies in serving this population.

In order to assure the coordination of services to facilitate the transition students from school to postsecondary life (including the receipt of VR services, postsecondary education, competitive integrated employment, and pre-employment transition services) OVR utilizes the following process. The VR Counselor is responsible for the schools located in their assigned county areas. Counselors work with school staff to identify potentially eligible students assuring that they are given the opportunity to apply for services starting at age 14. While the student is enrolled in school, the VR Counselor works with school staff to ensure the student receives the needed services to aid in the transition to post-secondary life. Services include but are not limited to pre-employment transition services, other VR services and programming offered by OVR, and other services specific to transition aged students by school districts and other entities. VR Counselors provide individualized services and where gaps in services are identified staff work to developed new and innovative services in the students' home area to better serve this population.

One project that aligns with this area in serving students is Project CASE (Creating Access to Successful Employment). In October 2015, the Kentucky Office for the Blind/Kentucky Career Center was awarded the Career Pathways for Individuals with Disabilities Model Demonstration Program Grant (CFDA 84.235N). This federal grant was provided through the Rehabilitation Services Administration (Department of Education) to create a program that would result in greater participation of VR-eligible individuals, including students and youth with disabilities, to acquire marketable skills and recognized postsecondary credentials necessary to secure competitive integrated employment in high-demand, high-quality occupations. Creating Access to Successful Employment (CASE) will help ensure that individuals with disabilities, even at the secondary school level, are not left out of participating in these existing initiatives, and can prepare for and obtain jobs in high-wage and high-demand occupations.

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

In 2018, OVR and OFB along with the State Rehabilitation Council conducted the Comprehensive Statewide Needs Assessment. The CSNA assessed the need to develop, establish and improve community rehabilitation programs. OFB surveyed staff, consumers and partners on the use of establishment grants to develop innovative programming. Through the needs assessment it was identified that this was an area for the Combined agency to concentrate on. OVR currently partners with 122 Community Rehabilitation Providers (CRPs) to serve eligible consumers. The Comprehensive Needs assessment again indicated a need for more providers, particularly in rural areas of the state. The CRP/Supported Employment Branch continues to recruit more CRPs. In recent years, OVR conducted competition among eligible organizations for establishment projects to provide services to underserved populations and in underserved areas. Eligible organizations were organizations approved as a Community Rehabilitation Program (CRP) by OVR or it must have attained such status by the beginning date of a Memorandum of Agreement (MOA). In addition, any applicant must be in 'good standing' with the Office of Vocational Rehabilitation and Kentucky State Government. New programs were started in the past year partially with funds from the Division of Behavioral Health (DBH) to serve more individuals with significant mental illness or substance abuse. OVR plans to involve CRPs across the state in providing Pre—Employment Transitions Services through an enhanced service fee schedule which should attract additional providers where needed.

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

Kentucky is committed to acquiring a system that gathers the collective data required under section 116 of WIOA for all the core partners. Currently, Kentucky is determining what gaps currently exist and identifying a plan for collecting, tracking, measuring and reporting data from the workforce partners. It is anticipated that this will require substantial work on several levels prior to the development and implementation of uniform system to capture the data. Changes under WIOA require significant modifications in the current manner that data is collected. Additionally the workforce partners use different systems and tracking mechanisms.

The current Kentucky OFB/VR Case Management System (CMS); a web-based system used to collect required data, enforce work flow rules, verify data accuracy, authorize and pay for consumer services, and produce a variety of monthly and real time reports; was implemented in October 2008. The system was designed to be fully accessible with particular attention to usability with screen reading technology - a goal that none of the "off the shelf" options for case management systems for vocational rehabilitation agencies could meet at the time.

With recent improvements in technology, several systems could meet the programmatic and accessibility needs of the agency. The current CMS system is approaching its useful life expectancy and upgrades to the current system as well as the purchase or licensing of other systems that would meet both the needs of the two vocational rehabilitation agencies and those of common measure reporting are being considered.

Additionally, the Education and Workforce Development Cabinet, Department of Workforce Investment is exploring the feasibility of purchasing or leasing a single system for all of the data collection needs of the Department including the Office of Employment and Training, Office for the Blind and Office of Vocational Rehabilitation. Early in 2016 Kentucky Skills Network partners will gain access to a Customer Relationship Management system based on a Salesforce platform. Phase 1 will allow for shared access to employer contact and needs, and Phase 2 later in 2016-2017 will add the capacity for KSN partners to add and assess employer programs and resources via the Salesforce application.

Regardless of the system that the Agencies choose to implement, innovations that are anticipated include: paperless cases, electronic signatures, improved reporting access, increased electronic communication and corroboration among Department partners, and system generated notifications and reminders to increase productivity. In the interim, the current system is being modified to meet the data collection requirements for common measures as well as the additional data elements required for RSA 911 quarterly reporting. We anticipate that the current system will be able to collect the necessary data beginning 7/1/2016 and produce accurate reports prior to the due dates for Rehabilitation Services Administration and common measures reporting.

Once a baseline is determined and the relationship between services, partnerships, etc. and successful outcomes and measurable progress is analyzed, strategies will be developed to improve the performance outcomes.

In October 2015, the Kentucky Office for the Blind, Office of Vocational Rehabilitation/Kentucky Career Center was awarded the Career Pathways for Individuals with Disabilities Model Demonstration Program Grant (CFDA 84.235N). This federal grant was provided through the Rehabilitation Services Administration (Department of Education) to create a program that would result in greater participation of VR-eligible individuals, including youth with disabilities, to acquire marketable skills and recognized postsecondary credentials necessary to secure competitive integrated employment in high-demand, high-quality occupations. The goals and strategies of this five year project and the evaluation plan for it strongly aligns with the performance accountability measures under section 116 of WIOA.

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

The Kentucky Workforce Investment Board over the past year led a rigorous process to identify challenges that may be limiting the ability of employers, communities and citizens to reach their potential. To address these challenges, there are a series of steps that require a sustained commitment from state and local policymakers along with the support of Kentucky's business community. In 2017, responding to concerns over Kentucky's workforce participation rate, educational attainment statistics, and public health indications the KWIB revisited its workforce strategy, developing recommendations to support a lifetime continuum of training, preparation, and investment for citizens. The Kentucky Work Ready - An Urgent Call to Action has the following four goals:

1) Actively engage employers to drive Kentucky's workforce development system.

2) Align and integrate P-12 adult education and postsecondary education to provide lifelong opportunities for Kentuckians that prepare them for the rapidly shifting realities of work in the future.

3) Increase Kentucky's Workforce participation by creating opportunities, workforce participation, and removing employment barriers for Kentuckians.

4) Focus resources on the most effective initiatives and improve the return on our workforce investment utilizing data to constantly improve workforce development in Kentucky.

Reciprocal referral services with the Office of Employment and Training and the Office of Vocational Rehabilitation: OET and OVR have established reciprocal referral services which allow for more efficient services to individuals with disabilities.

The Central Office administrative functions for these three workforce programs are centrally located in Frankfort to assure collaboration among the workforce partners. The Workforce Development Leadership team meets bimonthly to cover pertinent issues within the department.

The office participates in the ten Workforce local boards throughout the state as well as serving on different committees of those boards. Kentucky is one of the States participating in the operationalizing WIOA Co-Enrollment Cohort through the Department of Education and the Rehabilitation Services Administration and Department of Labor.

All five of the core partners are represented on the team. Kentucky strategies have and will continue to support WIOA's focus on low income adults and youth who have limited skills, lack work experience, and face other barriers to economic success. Vocational Rehabilitation is a full and actively engaged partner in Kentucky in the workforce system. OFB and OVR are actively engaged in the planning process, on committees and staff serves as project directors on some of the KWIB initiatives. They are advocates in the workforce system for individuals with disabilities.

KEE Suite is the integrated case management system being developed for state agencies (OVR, OFB, OET, CHFS, Adult Ed, WIOA, etc.) to streamline services for program participants in the Commonwealth. It is currently planned to replace OVR's current case management system in the fall of 2019. We are in the beginning planning stages for the VR specific portion of the system. All information entered into the system will be shared on Permission based guidelines, set by the Agency(s) based on State and Federal Law. Shared Personally Identifiable Information (PII) that will be available to the participating partners in this system will be Common basic information requested and collected from the participant by each partner to streamline and simplify the process for the participant instead of the participant being required to answer and supply the same information multiple times, and to facilitate the federal reporting of the WIOA required Common Measures. VR specific data and records will be secured by access restrictions in place based on a need to know policy.

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

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

OVR followed the guidelines established for a Comprehensive Statewide Needs Assessment and the Vocational Rehabilitation Needs Assessment Guide established by the Rehabilitation Services Administration and The Rehabilitation Act of 1973, as amended by the Workforce Innovation and Opportunity Act, signed into law on July 22, 2014. As specified by the guidelines, a number of data sources were used for this report. In order to provide some context to our analysis of the needs of blind and visually impaired Kentucky residents, this CSNA also examines a number of statistics and

estimates provided at the state and national levels. Priority I: Develop and implement strategies to improve OVR's performance on the required accountability measures under section 116 of WIOA. Priority II: Provide excellent customer service and maintain collaborative working relationships with the WIOA partners in the Career Centers. Priority III: Provide supported employment services that lead to competitive integrated employment and improve the number of successful outcomes for supported employment cases across the state

Goal 1: Recruit, employ, retain the most qualified and highly skilled rehabilitation staff which reflects employment focused, job driven outcomes.

Objective 1.1 : Examine staff patterns and service capacity in order to effectively deliver quality vocational rehabilitation services.

Strategies: Identify crucial positions to be filled with qualified candidates

Strategies: Staff Utilize sector strategies regional, industry—focused approaches to building skilled workforces that result in job opportunities for all workers across a range of industries

Measures: Increase staff retention rates by 10%

Goal 2: Develop and implement training that adequately address the needs of staff under WIOA and changes to policies and procedures under the combined agency.

Objective 1.2: Develop and deliver identified training to staff that aligns with a shared vision and mission of the combined agency.

Strategies: Assess the training needs of staff as they apply to combined policies and procedures and WIOA.

Measures: needs assessment completed of staff training delivered on WIOA of staff training delivered relating to policies and procedures

Goal 3: Develop the policy and procedures manual, Service Fee Memorandums, and other written materials to be concise, accurate, and accessible in order to support staff, eliminate confusion, and improve the function of the combined agency.

Objective 1.3.: Ensure the provision of consistent and quality services for individuals with disabilities in the Commonwealth.

Strategies: Assign staff to specific work teams

Strategies: Review and modify forms, printed materials and manuals in keeping with the combined policies and procedures.

Measures: Completion of the combined policies and procedures manual

Revision and Implementation of Service Fee Memorandums

Review and modify forms, printed materials and manuals in keeping with the combined policies and procedures.

All materials produced in accessible formats

Goal 4: Effectively utilize staff and fiscal resources in order to provide statewide services to all eligible consumers and increase competitive integrated employment outcomes.

Objective 1.4: Open categories under Order of Selection

Measure: Elimination of the waiting list by category

Measure: Serve open categories keeping with the OOS policy

Objective 2.4: Expedite services in order to increase outcomes

Strategies: Counselors will address and distribute a Benefits Planning Fact Sheet, developed by the SSA Coordinator for Vocational Rehabilitation, for eligible consumers, especially during discussion of the Individualized Plan for Employment (IPE);

Strategies: Provide instruction in self—advocacy, benefits planning, and financial readiness at Carl D. Perkins Vocational Training Center (CDPVTC) and Charles W. McDowell Center

Strategies: Participate in the Kentucky Career Center Business Service Teams and make business contacts statewide;

Strategies: Collaborate with the Coalition for Workforce Diversity in Louisville and explore expanding the model statewide;

Measure: Average time between eligibility and plan reduction of 10%

Measure: All applicants who receive SSA benefits will receive information on benefits planning and at least 50% of them will receive a benefits analysis.

Supported Employment Goals and Strategies

Goal 1: Increase the number of CRP's providing Supported Employment Services

Strategies: Recruit more providers for supported employment by holding outreach opportunities for potential providers and support providers for unserved and underserved areas;

Measure: Increase in the number of providers (5%)

Goal 2: continue to monitor and explore additional strategies to improve CRP service quality and compliance

Strategies: Involve job coaches with transition students by the last semester of school;

Strategies: Train staff on new policies related to customized employment and person—centered planning;

Strategies: Require notes to be submitted by Supported Employment Providers by the 5th day of each month.

Strategies: Continued monitoring by the Section 511 Implementation Team to insure agency compliance to WIOA requirements related to OVR relationships with sheltered workshops;

Goal 3: Seek alternative strategies for providing and funding Long Term Support Services.

Strategies: Gather input from staff, education partners, and service providers, individuals with disabilities, their families and other stakeholders:

B. SUPPORT INNOVATION AND EXPANSION ACTIVITIES; AND

OVR will use innovation and expansion funds to support the following activities: To support the Statewide Council for Vocational Rehabilitation (SCVR, Kentucky's SRC), including all meeting expenses and expenses related to conducting an annual survey of consumer satisfaction; the Annual Report of the council; and support of the Statewide Independent Living Council (SILC).

Other activities are:

To conduct marketing activities for KYOVR, including the printing of brochures and other materials

To support summer transitions program specifically designed for high school rising juniors and rising seniors who have been diagnosed on the Autism Spectrum who have expressed an interest in transitioning into higher education, as Pre—Employment Transition Service activity.

It is anticipated the tasks identified in the current plan would provide expansion and innovation related to Supported Employment, partnerships with business, access to Assistive Technology, asset development programs and community rehabilitation programs.

The plan will also focus on innovation related to counselor training, staff recruitment, and quality assurance. OVR has been involved in a number of initiatives and projects in an effort to expand and improve services to individuals with disabilities. There are other projects that are just beginning that should also help expand and improve services.

Past, current and planned projects and efforts include: A project funded by the Institute for Community Inclusion at the University of Massachusetts to develop quality standards to include in the performance plans of front—line vocational rehabilitation counselors. These standards are designed to improve the quality of services provided to consumers. The standards that were developed were incorporated into VR counselor performance plans beginning in federal fiscal year 2014. An effort to incorporate asset development and financial education strategies into the vocational rehabilitation process. The effort has included several facets. Agency staff has received numerous training opportunities related to asset development in the last few years. KYOVR has partnered with Louisville Metro government to make their financial empowerment services more inclusive of individuals with disabilities. KYOVR has striven to make benefits planning an integral part of services to individuals who receive Social Security benefits because of disability, instituting a benefits planning fee—for—service that has been well utilized by VR counselors for their consumers. KYOVR has developed a Financial Resources Directory for use by staff and consumers. A research study funded by the Institute of Community Inclusion (with funds from the Rehabilitation Services Administration) to test the effectiveness of an intervention with 500 individuals who receive SSDI only in obtaining employment at substantial gainful activity (SGA) level. The intervention involves enhanced pacing of services and the early involvement in the process of a team approach that includes the VR counselor, a job placement staff person and a Certified Work Incentive Coordinator. The 500 participants in this study

will be enrolled from May 1, 2015, through April 30, 2016. In the final report published by Mathematica it stated that the likelihood of being closed with a competitive employment outcome increased by 8% (25% vs. 17%) in the enhanced services versus the usual services group. Furthermore, the likelihood of being closed with earnings above SGA increased by 5.7 % (8.25 vs. 2.5%). The likelihood of receiving an IPE within 30 days of application increased by 17% (27% vs. 10%). Because of these significant improvements the agency decided to implement the enhanced services and the team approach statewide. Participation, along with four other state VR agencies, in a study being conducted by the University of Richmond and George Washington University on the Return on Investment (ROI) of vocational rehabilitation services. The results of the study can hopefully be used to help agency leadership make decisions on where to focus services and resources. A project recently funded with \$20,000 from the Kentucky Office of Autism to provide disability awareness training to Kentucky Career Center business service teams who can, in turn, train employers. Two efforts spearheaded by the KATS Network, the state assistive technology project within OVR, to increase access to assistive technology. One, Project CARAT (Coordinating and Assisting the Reuse of Assistive Technology), refurbishes and redistributes durable medical equipment to individuals who need it. The other, Project SHARP (Statewide Hearing Aid Assistance and Reuse Program) assist low income individuals in obtaining hearing aids. A federal Career Pathways grant recently received by the Kentucky Office for the Blind (OFB) from the Rehabilitation Services Administration. OVR will collaborate with OFB on assisting consumers in three career pathways (healthcare, manufacturing, and information technology) in two of Kentucky Career Centers, Kentuckian Works in the Louisville metropolitan area and the Eastern Kentucky Concentrated Employment Program (EKCEP) in rural Appalachia.

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.

OVR has taken steps to ensure equitable access to and participation in federally funded programs for all consumers and for agency staff regardless of race, color, national origin, sex, sexual orientation, gender identity or age. The agency takes into consideration the needs of staff in correlation to the service needs of individuals with disabilities in Kentucky specifically for: Individuals with the most significant disabilities, including the need for supported employment services; and individuals with disabilities who are minorities and individuals with disabilities who have been unserved or underserved by the vocational rehabilitation program. We will comply with the provisions of the Americans with Disabilities Act (ADA) Public Law 101—336, and applicable federal regulations relating to prohibiting discrimination against otherwise qualified disabled individuals under any program or activity and adhere to the US Department of Labor Final Rule on Federal Executive Order 11246.

Office of Vocational Rehabilitation is committed to a policy of equal opportunity to all qualified applicants without regard to race, color, national origin, gender, age or disability. OVR encourages applications for employment from persons who are members of groups that have been traditionally underrepresented in the workplace such as members of racial or ethnic minority groups, women, and those with disabilities. There is an explicit commitment to assuring equal access for all communications through outreach, media contact of any form inclusive of social media, websites, online learning or flyers, and other announcements or correspondence under the project.

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.

This section was the submission of the Office of Vocational Rehabilitation on April 2, 2018 for the required Combined State Plan for Kentucky.

Goal I: To continuously improve customer service. We are always doing customer satisfaction surveys for the center and for our career centers. We have reordered and simplified some of the questions on the survey. The Carl D. Perkins Vocational Training Center (CDPVT) also did customer satisfaction surveys on the Nurse Aid Program and for the counselors who refer consumers to the center. They have also sought to form/improve partnerships with the Job Corps Center and the Perkins Center business partners. We have more offices that are now housed in career centers rather than stand-alone offices, and more career center certifications have been completed. We are still giving out loans with KATLC and utilizing CARAT and SHARP for assistive technology services for our consumers. CARAT has been extended statewide with sites in Thelma, Hazard, Louisville, Paducah, and eventually Lexington. CARAT has also developed a long-term sustainability plan. The Paducah site, located at Lourdes Hospital, has formed its own 501 c 3 and is soliciting funds from the local community to pay for part-time staff. Lourdes Hospital donates the space and utilities for CARAT's operation. The KATS Network helped get the site established with donating a Hub Scrub and office/warehouse furnishings and tools. The KATS Network also funded a part-time staff position so the site could get established in Paducah. KATS Network funding has now ceased and the site is sustained by community resources in Western Kentucky. The other CARAT sites are self-sustaining with KATS Network base funding for Assistive Technology programs. These sites also perform DME re-use CARAT activities. These programs are also supported by the post-secondary educational institutions that they are housed in. CARAT is also a partnership OVR/KATS Network has established with KY DPH Preparedness Branch. The position of CARAT Outreach I now funded 50% by the KY DPH Preparedness Branch as they pay this position to also act as the FAN (Functional Access Needs) Coordinator, a position that is required by their federal funding for emergency preparedness. KATS continues to work with audiologists and Hearing Health Providers (HHPs) statewide to identify income eligible candidates needing financial assistance to acquire hearing aids. KATS provides financial assistance of \$125 to income eligible candidates to assist with the application fee (\$250) for Hear Now. KATS continues to accept donations of used hearing aids, which are turned over to the Starkey All Make Repair Program for cash credit. KATS uses this credit to pay for (up to \$250) hearing aid repairs. The Starkey Foundation (Which oversees the Hear Now Program has agreed to accept cash donations on behalf of KATS/SHARP, which will be used to help cover the cost of application fees for Kentucky residents applying for hearing aids through Hear Now. We have also established a new KWIC process and a best practice for expedited services related to benefits planning for our consumers. We have also implemented the DB101 website as an aid to Benefits Planning. The Carl D. Perkins Vocational Training Center plans to meet with EKCEP in March of 2018 to discuss transportation in the region.

GOAL II: To provide Pre—employment transition services (Pre—ETS) to Transition students (ages 14—21) and other transition services to Youth (ages—16—24) to assist them with transition from high school into competitive integrated employment or post—secondary training. Our OVR counselors are currently providing Pre—ETS services to Transition Students and keeping track of what activities they complete from the list of activities. We discussed the process of getting youth into competitive integrated employment as a marathon and not a relay race where we rush them from place to place. At the very least, we need some steps in between to help them better. The Carl D. Perkins Vocational Training Center will implement an online class as orientation for those students who are entering the center to improve their preparation for the Behavior Intervention and Supports Technique system

that is in place. The Pre—ETS activities may be part of this change too. The staff has been trained on Pre—ETS, and we are providing funding to the regional educational cooperatives to provide localized pre—employment transition service trainings via conferences/workshops to all transition students with disabilities across their regions, including underserved populations. By partnering with the cooperatives across the state, we are ensuring all students have an opportunity to participate without regard to their eligibility status as a consumer. With WIOA we can now provide services to ‘potentially eligible’ students so prior to their application we may still provide them post school activity information, including employment, in groups prior to their exit from high school. We have even made a video that can be used for outreach to large groups of students and viewed online to inform them about OVR services. We are also receiving foster care referrals from the Department of Health and Family Services and sending them to our various career centers around the state for application for OVR services. The College and Career Readiness Initiative has rolled out statewide and has two years left for complete implementation. The Youth One Year Our survey was sent out and completed. The Community Work Transition Program (CWTP) is estimated to be in at least 80 school districts as of the 2017-2018 school year. This is up from 54 school districts in 2015. The training materials are being revamped and nine 1-day trainings are being provided and two new school trainings are being implemented. The two new trainings will divide the state into two regions. In 2016-2017, the 25% match funds were dropped and outreach to the schools has been implemented to promote the CWTP Program. Seventeen school districts have been reached as of 2017. The schools and their families are provided information regarding Pre-ETS through the Co-Op Contracts. A video has been developed by the staff at the Carl D. Perkins Vocational Training Center in February 2018 to help develop and implement online classes to augment to the vocational behavior enhancement program at the center. They are working on implementing it with the students. The Carl D. Perkins Vocational Training Center (CDPVTC) now has a way to pay the schools for the registration costs related to participating in a tour of the school. Utilizing the Co-Op Contract, there is also a way to provide money for college tours. The Autism Council subcommittee is looking at providing a statewide training. The agency is monitoring their contract moving forward. The agency is also asking colleges to provide summer camp experiences for students with Autism. UK/HDI and ECU are providing Autism Camps. The Dual Enrollment Project is also a means that will be available to students with Autism to take college classes while still under IDEA. This will be presented to AHEAD and looking to create a contract for the fall of 2018 for Fayette, Boone, Jefferson, and KCTCS. Brent Sturgill, Eastern Regional Manager, has been appointed as liaison to the Carl D. Perkins Vocational Training Center (CDPVTC) in order to increase referrals for the Work Adjustment Program and the Life Skill Enhancement Program. In the 2016-2017 year, there were 151 vocational evaluations completed at the Center to assist in job exploration counseling and to identify/provide training related to the STEM careers. The agency is partnering with the Autism Committee to help them use their state funds, and there was an increase in funding that will allow for both the continuation of the business and the addition of a statewide training. A Permission to Participate form has been implemented for the CWTP and the Co-Op contracts that will assist the CMS process of generating potentially eligible authorizations. Financial education training is provided to the Co-Ops and at the Carl D. Perkins Vocational Training Center (CDPVTC) as a possible resource for their programs and as a way to promote self-advocacy. We also have three established summer activities for transition youth/students annually in various parts of the state outside of the Co-Op contracts. In 2016, Carl D. Perkins Vocational Training Center started a Transition Camp for youth and students related to a summer work experience in retail, but it was discontinued by the Cabinet. The Co-Op contracts themselves could be a means to fulfill the goal of 5 summer activities for transition youth/students annually in various parts of the state. The contracts are up for renewal in June of 2018. The Henderson school district is providing summer work experiences in their region, and Campbell County is implementing program that allows smaller schools in the region to participate. All training programs at the Carl D. Perkins Vocational Training Center (CDPVTC) have associated work based learning experiences in the local community. The agency

is always pursuing other collaborative activities to provide Pre-ETS, and we have made at least 9 proposals to Community Rehabilitation Programs (CRPs). These proposals are in the process of being implemented. The contract was completed and renewed for a partnership with the Kentucky Partnership for Families and Children to sponsor students to attend the KPFC Youth Parent Conference. The PepNet2 project grant has ended related to partnerships with the school system and KDE to improve transition outcomes for students who are deaf and hard of hearing. This population, however, will be the focus of a Co-Op contact as a targeted population.

GOAL III: Provide information concerning benefits planning and financial planning in order to promote inclusion, integration, and empowerment of individuals with the most significant and significant disabilities. We have written and passed a new policy on Benefits Planning and Analysis. A fact sheet has been developed for resources in benefits planning that will be given to OVR consumers at time of eligibility or later in the case if they begin receiving Social Security benefits. We are also 8 months in on the SGA project, which gives benefits planning to individuals with SSI and seeks to help them gain competitive integrated employment. OVR services are completed in an expedited fashion in order to insure quicker service provision. The agency has developed a Spanish version of the Benefits Planning fact sheet to make it more accessible. The staff has been trained on Disability Benefits 101(DB101) an electronic system to help with benefits planning. It was launched in December of 2017. As of 2017, the agency is keeping the fee for a Benefits Analysis at \$450, but we are hoping the use of DB101 will cut down on the authorization for a benefits analysis. The agency is also hoping that benefits counseling is provided earlier in the process and planning of a case. The agency is also encouraging Community Rehabilitation Programs (CRPs) and non-profit providers to consider providing benefits planning services. The agency is encouraging the CRPs and non-profit providers to participate in "Introduction to Social Security Disability Benefits, Work Incentives, and Employment Support Programs" offered by Virginia Commonwealth University (VCU) in hopes that some staff might become interested in pursuing certification to provide those services. The agency also recommends WIPA referrals for free planning services where available and appropriate. The Carl D. Perkins Vocational Training Center (CDPVTC) also held sessions conducted by Key Assets in 2016 on self-advocacy, benefits planning, and financial readiness. These sessions were conducted by Community Action in 2017. The agency also sends a representative to the WIPA Collaborative group to stay in contact with staff and head off any issues or concerns. The agency did an Asset Development Summit in Eastern Kentucky in 2017. The KATLC website also offers an online financial education and empowerment resource for consumers. The agency also seeks to partner with other entities (at least three) to promote and expand financial empowerment activities for individuals with disabilities. The agency is now partnering with Louisville Metro Government, KCADV, and Bank On Louisville. The agency also collaborates with the Kentucky Career Centers to provide financial education as appropriate.

GOAL IV: To provide job placement and supported employment services in order for consumers with significant and most significant disabilities respectively to attain competitive integrated employment. We have changed our policy to include competitive integrated employment as a goal instead of just competitive employment. We plan to work with the school systems on this as well. As part of the SGA Conference, the Job Placement Staff had a Pre-Conference where representatives from local businesses attended to answer questions on hiring practices. The Job Placement Staff also attended training with Leah Lobato, who works for the Office of Vocational Rehabilitation in Utah, on federal hiring practices. We also do Job Placement Month every October, and offices around the state do job placement related activities to promote it. The Carl D. Perkins Vocational Training Center (CDPVTCT) conducted 4 activities in 2016 and 2017 for Job Placement Month. We utilized the SGA Project to update our policy with new policies on a team approach to cases, including job placement specialist involvement earlier in the case. At the Carl D. Perkins Vocational Training Center (CDPVTCT), 14 students are participating in Project CASE career pathways. Staff are participating in business service teams where they are up

and running, especially in Western and Northern Kentucky. The Coalition for Workforce Diversity has been expanded beyond Louisville to Lexington, Morehead, Ashland, and Mayfield. Training opportunities for staff on new policies related to customized employment and person-centered planning have occurred in statewide, regional, district, and local office training events. A statewide survey addressing the need of customized SE services has been given, as a means to continue to identify need for training as well as to identify the need for this valuable service. As far as notes being given to staff by supported employment provides by the 5th day of each month, CRP consultants continue to monitor and train CRP's on record keeping via program reviews, meetings, and other training opportunities. CRP's are also introduced to this mandate through their participation in the Supported Employment Training Project (SETP). A more formal and standardized monitoring system is being explored. More supported employment providers are being recruited with outreach opportunities and select meetings are being held with potential CRP's in areas that have limited service providers to discuss CRP provided services in hopes of acquiring new CRP's. Various Coalition for Workforce Diversity meetings are being held around the state that are being utilized as well to solicit CRP's. The agency continues to seek alternative methods for providing funding for long-term support by continuing to effectively communicate with the Division of Behavioral Health/Developmental and Intellectual Disabilities to gain knowledge of long-term support funding as it applies to the Supported Community Living (SCL) waiver and the Michelle P. waiver. Continue to work with CRP's to encourage and provide creative solutions to access community funding that may be used for LTS. The agency also seeks to involve job coaches with transition students by the last semester of school with continued partnerships with CRP's and Local Education Units to further implement Pre-Employment Transition Services as outlined in the Workforce Innovation and Opportunities Act (WIOA), while partnering with CRP's to provide CRP related services before exiting secondary training.

GOAL V: To implement Section 511 of WIOA. We have team together to look at the best way of implementing this process. We will target students who are not usually referred to OVR while in school, but would have been sent straight to the Sheltered Workshop once out of School, for an early referral to OVR to go through the VR process. Youths out of school but younger than 24 will be referred to an OVR counselor to go through the VR Process. Letters will go out to all 14C Programs in Kentucky in the spring of 2016 explaining section 511 and VR's involvement in the process. Each 14C will be visited by one of the 3 SE Consultants. Educational groups will be set up for all the current employees of the 14C facilities about career exploration and community integrated employment. These will be done every 6 months for the 1st two years and annually thereafter. A Section 511 team was created and fulfilled identified goals. Communication with 14c holders occurred to provide education on Section 511. A Section 511 video was developed for consumers to view to meet the career counseling mandate. Career counseling participation and completion documents are collected and reviewed to ensure requirements are met. Ongoing monitoring continues by CRP consultants. Input continues to be gathered and communication continues to occur and information is collected during trainings, meetings and focus groups. Process implementation was provided to educate CRP's on Section 511, and to ensure career counseling is provided to consumers. Effective communication and monitoring continues to occur to ensure consumer needs and requirements are met. Documentation is obtained from the CRP Branch as it relates to refusal of services.

This section was the submission of the Office of the Blind on April 2, 2018 for the required Combined State Plan for Kentucky.

This section will contain a reporting of the strategies under the FFY 2016 State Plan for the Kentucky Office for the Blind that contributed to the achievement of the goals. The SRC Planning Committee and the Kentucky Office for the Blind have recommended and approved the following Goals at the February 2016 meeting.

1. To increase opportunities for independent living and improve the quality of vocational rehabilitation services for Kentuckians with visual disabilities in order for them to prepare for, obtain, maintain or regain competitive employment.

Objective 1.1: Develop new relationships with employers, community organizations & government agencies to promote employment opportunities. Strategies Cultivate relationships with area employers. Increase “valuable services” to employers such as job analyses, consultation services on hiring, making accommodations, assistive devices, disability awareness trainings, ADA trainings, etc. Collaborate with key partners (SRC, CRPs and Workforce Development Partners) to enhance connections with the employer community. Collaborate with the Career Center Business Services Team to expand relationships, avoid duplication of contacts with employers, and maximize employment opportunities for people with disabilities. Strategies

Objective 1.2: Provide resources for consumers that lead to successful outcomes. Coordinate benefits planning that supports individuals to set goals for increasing self—sufficiency Provide referrals to appropriate resources that address barriers to gaps in services. Provide assistive technology instruction with a workforce—ready emphasis on training in common office setting applications. Partner with advocacy organizations to address personal and family adjustment to blindness issues through counseling and peer mentoring

Objective 1.3: Develop and implement strategies to improve OFB’s performance on the required accountability measures under section 116 of WIOA. Utilize agreements with the Office of Employment and Training (OET) to access wage data in order to capture 2nd and 4th quarter employment data for consumers. Identify new partners and enhance existing partnerships to improve performance outcomes Set baselines, identify successful outcomes and acceptable measureable progress Develop strategies to improve performance outcomes Work collaboratively with partners in the development, design and implementation of a system that captures the required data elements

Goal 1 Report of Progress: OFB staff developed business relationships with several federal employers including the IRS, Census Bureau, SSA, and the VA. As a result we recruited 15 employees of which 6 have become successfully employed between these agencies. OFB staff continue working with the National VR-NET businesses such as CVS and Conduit which is targeted recruitment work from home positions for candidates who use screen readers and positions with Microsoft federal employers and sub-contractors regarding the mandate of the OFCCP. OFB serve as a point of contact with the local coalition for Workforce Diversity that is comprised of areas employers. Locally in Louisville staff are working with Metro Louisville to enhance opportunities for consumers that use screen reading software (transcriber’s positions with the local police department). Staff provided sensitivity to manufacturing facilities enhancing awareness of potential talent in hiring individuals with disabilities. Staff on a regular basis provide consultation to business and industry to educate them regarding vocational rehabilitation services such as Amazon resulting in two hires. The employees use assistive technology magnification hardware to perform job tasks. OFB staff worked collaboratively with Tampa Lighthouse in Florida to gain information in the provision of specific accommodations to a local hotel chain in the Louisville area. This project led to three interviews and one hire. Provided follow-up assistive technology assessments for existing employees in several companies (i.e. Charter Communication, Humana, and LG&E) in order for individuals to advance upward in their positions. OFB utilized the services of the advocacy organizations in mentoring two consumers that had significant barriers to employment. There is representation of OFB staff on the Career Center Business Services Teams and staff have access to Salesforce in reporting employer contacts. OFB through an agreement has access to wage data in order to capture 2nd and 4th quarter employment data for consumers. All the partners continue to work together in Kentucky on the design and implementation of a system that captures the required data elements.

Goal 2: Use resources effectively and efficiently in order to maximize funds in serving individuals who are Blind and Visually Impaired in the Commonwealth.

Objective 2.1: Maximize federal match dollars for the Vocational Rehabilitation Program. Strategies Research and explore all available options and opportunities. Research allowable use of funds through the Establishment Grants for Match

Objective 2.2: Monitor ongoing fiscal and staff resources in order to maximize service dollars Strategies The Executive Leadership Team will review at a minimum on a quarterly basis data on numbers served, the number placed on a waiting list, and agency fiscal resources to determine the need to open or close categories. Ongoing review of data from the case management system (i.e. application, referral and caseload trends). Consultation with the State Rehabilitation Council regarding the administration of Order of Selection consistent with 34 CFR 361.36.

Objective 2.3: Maximize services in expending required percentages for Pre-Employment Transition Services and SE services for the transition population. Strategies Monitor service provision and the drawdown of funding. Report of Progress: In FFY 2015 and FFY 2016 combined, OFB relinquished over \$2.0 million in federal funds due to being under match and penalties for not maintaining the state effort. In 2017, OFB was able to draw down its full match; however it did this by borrowing ahead from General Fund Quarter allotments which is not a good fiscal practice. It is anticipated this year as a result of the work of Cabinet and Workforce staff the General Fund Budget will receive an increase that will allow for OFB and OVR to fully match their award. OFB along with the Fiscal Integrity Budget Unit meet regularly to analyze the data regarding numbers service and the agency fiscal resources and the need to open or close categories. Based on OFB's burn rate of expended funds and available funds it is not feasible to serve any on the wait list and we are unable to open categories. Information was shared with the State Rehabilitation Council on a regular basis. For OFB, the 15% requirement equates to spending approximately \$990,000 or 55% of our caseload dollars on this small population leaving 45% of our caseload dollars for approximately 1,400 individuals who are not in a secondary school. In Kentucky there are 73 school districts statewide consisting of 1,233 schools inclusive of 564 Visually Impaired Students and 18 Deaf Blind ages 3-21 according to the Kentucky Instructional Materials Resource Center (KIMRC).

OFB worked collaboratively with the General agency in expending its carryforward dollars from 2016. OFB and OVR jointly submitted their Pre-Employment Transition Services fiscal forecasting plan and are on target to expend money for the FFY 17 and 18.

Goal 3: KBE will provide full—time employment and career opportunities for Kentuckians who are legally blind, while providing quality vending and food services for government and business.

Objective 3.1: Maximize training opportunities for vendors and KBE staff. Strategies Offer and conduct annual vendor training for potential licensees. Offer and conduct annual upward mobility training for current vendors. Offer and conduct training for KBE staff.

Objective 3.2: Provide new vending opportunities. Strategies Communicate with federal and state agencies to acquire new locations. Work with the State Blind Vendor committee to seek out possible opportunities. Survey at least one potential location each month as opportunities permit, with a minimum of 4 per year. Objective 3.3: Improve existing vending locations. Strategies Actively seek potential satellite locations for assisting vendors and to enhance vendor income. Utilize management resources to improve profit percentages. Offer training and services to improve business practices

Report of Progress: OFB held new vendor training in 2017 and licensed three new vendors. Two upward mobility trainings were held for the topic areas of Set Asides conducted by Terry Smith and Sexual Harassment by the Kentucky Human Rights Commission and Business Enterprises Staff were included in these trainings. Kentucky Business Enterprises follow up on all potential site from the

Government Services Administration (GSA). 2017 was a year in transition for the new Director of Kentucky Business Enterprises. Currently we are in process of looking at three new potential locations. The vendor set aside funds were utilized in 2017 for purchase of new equipment to upgrade operations.

Goal 4: Recruit, employ, retain and train the most qualified and highly skilled rehabilitation staff which reflects employment focused, job driven outcomes.

Objective 4.1: Increase the skills and competency levels of all rehabilitation staff statewide. Strategies Maximize training funds to support staff in professional training and development activities. Provide quality training statewide that is job specific and targeted to address any deficiencies identified in quality assurance reviews or training needs assessments. Provide job—driven training that promotes skill enhance and employer engagement.

Objective 4.2: Improve services to underserved populations within the blind and visually impaired community, including substance abuse, mental health, and criminal background. Strategies Participate in cross training's with agencies who provide services to treat mental illness, substance abuse to provide all professionals a better understanding of the unique services necessary to improve outcomes for consumers. Collaborate with criminal justice agencies to promote better understanding of issues that impact employment for consumers with backgrounds. Reports of Progress: Given budget constraints progress on this goal area was limited. Staff were provided training for those areas through quality assurance reviews deficiencies were identified and areas of concern voiced by staff through the training assessment were prevalent. Trainings occurred for changes in the case management system for 911 fields as well as on Pre-employment Transition Services. The Cabinet sponsored cross training for the area or team building. There was no progress for the area of substance abuse, mental health or criminal backgrounds.

Goal 5: Enhance and build Office for the Blind internal and external collaborative relationships and partnerships to advance opportunities for individuals to progress toward independence and employment.

Objective 5.1: Develop a marketing approach and plan to guide OFB's partnership efforts with eye physicians. Strategies Identify through WEBI existing eye physicians that serve as a regular referral source to each caseload. Identify caseloads that do not have a regular referral flow from an eye physician. Update marketing materials to clarify how to make appropriate referrals.

Objective 5.2: Increase available resources & seek to leverage funding, staff resources, in—kind and programmatic support & other forms of assistance from partners. OFB will collaborate with other statewide partners increasing their capacity to serve individuals with disabilities, and will refer eligible individuals who can benefit from the resources and services available at no cost. OFB staff will provide training for Career Center Partner Staff to increase knowledge and confidence in working with individuals who are blind and visually impaired. Report of Progress: A plan for marketing to eye physicians was developed and implemented. The main focus is the Spring Optometric Association Annual meeting event held annually. OFB identifies staff with lower referrals from eye physicians through WEBI reports and they are targeted to attend the event for networking purposes. Though the conference we receive a list of eye physicians throughout the state that is then distributed to staff for marketing and outreach purposes. Through the Career Pathways Grant OFB has made a lot of progress in collaboration with statewide partners to increase capacity in serving individuals. Project CASE Career Pathways Coordinators provided all the liaison and coordination services for the following STEM Camps, which were held in Eastern Kentucky on the campuses of Big Sandy Community and Technical College, Southeast Community and Technical College, and Hazard Community and Technical College. The grant has allowed for enhanced connections with the system initiatives in the local workforce areas. Goal 6: To engage youth, parents, high schools, and other

transition specialists in exploring and planning career choices that connect to a full range of post—secondary options for training, career development, and competitive integrated employment.

Objective 6.1: To improve the number, quality, and rate of employment outcomes for youth and students participating in Transition services. Strategies VR Counseling Staff, school counseling and teaching staff, and VI teachers statewide will collaborate to achieve earlier involvement of OFB counselors in IEP development of vocational goals. OFB transition policies and practices used to guide the implementation and continuous improvement of services leading to employment will be based on the gathering and tracking data through the case management system.

Objective 6.2: Develop and implement a plan for PREETS services Development and implementation of a plan for service delivery. Expansion of the Student “Employability Skills Boot Camp” (i.e. workplace readiness and independent living, counseling on training and education opportunities, self—advocacy, job exploration counseling). Development of more opportunities for workplace learning including paid work experiences and job shadowing. Plan and conduct regional transition conferences.

Objective 6.3: Enhance student awareness of enrollment in transition programs Promote summer transition programs through innovative marketing strategies in order to increase referrals. Implementation of marketing strategies to VI teachers, students and their families. Report of Progress: Path a summer transition program for students ages 14-21 who are blind and visually impaired was held at the Charles W. McDowell Center in Louisville during July. There were 16 students in attendance. Students participated in classes teaching blindness skills such as orientation and mobility, assistive technology and braille. Additionally, the curriculum had a focus on pre-employability skills such as local labor market information, career pathways, and financial literacy and interest inventories. Students went off site for employment site tours and participated in recreational activities that provided for many their first exposure to those kinds of events. The Kentucky School for the Blind Summer Work Program was held June 19-30. Through this program eighteen students had the opportunity to work at Kentucky Kingdom or the Louisville Zoo. Students were paid more than minimum wage for up to 55 hours of work experience over the two weeks of the program. The Deaf-Blind Project’s Expanded Core Curriculum Foundation to Transition Program was held in Lexington June 19-23. Eight students who Deaf-Blind participated in this program, which focuses on the expanded core curriculum for students who are Deaf-Blind. Four students who attended last year returned this year to act as mentors for 4 new students. INSIGHT was held June 10-17 at Morehead State University. 21 students from across Kentucky completed the program, which gave them an opportunity to experience college life through attending college level classes, staying in a dorm, eating in a cafeteria, and participating in social activities. The Kentucky Office for the Blind set the following goals for the distribution of Title VI, Part B Funds. Goal 1: Increase supported employment outcomes and other supports to assist individuals who are blind and visually impaired with most significant disabilities Develop and release an RFP for establishment grants for CRPs to address integrated competitive employment for adults, students, and youth who are blind or visually impaired. Award and implement establishment grants. Leadership will continue to participate in statewide training meetings with CRP Directors and their staff to identify and resolve issues and share best practices to improve services for individuals who are blind and visually impaired, including youth with the most significant disabilities. Reports of Progress: OFB served 70 through Supported Employment (7 PEO; s) in 2016. Nine of these were youth with 2 PEO’s. In 2017 there was an increase of two serving 72 (7 were youth) with seven PEO’s of which none were youth. We still have a lot of work to do in this area. We did develop a policy on establishment grants and a request for proposal. Given staffing changes and the work on the merger of the two agencies we did not follow through on implementing the establishment grants. Goal 2: OFB will identify and utilize internal and external resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities. OFB will utilize the expertise of the Human Development Institutes’

Supported Employment Training Project at the University of Kentucky. OFB will attend training through the HDI project as well as in house training on policy updates and changes. OFB will work closely with APSE, Community Mental Health Centers, the Department of Behavioral Health, Developmental and Intellectual Disabilities to identify strategies to expand services to youth.

This section will contain a reporting of the strategies under the FFY 2016 State Plan that contributed to the achievement of the goals. The SRC Planning Committee and the Kentucky Office for the Blind have recommended and approved the following Goals at the February 2016 meeting.

1. To increase opportunities for independent living and improve the quality of vocational rehabilitation services for Kentuckians with visual disabilities in order for them to prepare for, obtain, maintain or regain competitive employment.

Objective 1.1: Develop new relationships with employers, community organizations & government agencies to promote employment opportunities.

Strategies

Cultivate relationships with area employers. Increase “valuable services” to employers such as job analyses, consultation services on hiring, making accommodations, assistive devices, disability awareness trainings, ADA trainings, etc Collaborate with key partners (SRC, CRPs and Workforce Development Partners) to enhance connections with the employer community.

Collaborate with the Career Center Business Services Team to expand relationships, avoid duplication of contacts with employers, and maximize employment opportunities for people with disabilities.

Strategies

Objective 1.2: Provide resources for consumers that lead to successful outcomes. Coordinate benefits planning that supports individuals to set goals for increasing self—sufficiency

Provide referrals to appropriate resources that address barriers to gaps in services.

Provide assistive technology instruction with a workforce—ready emphasis on training in common office setting applications.

Partner with advocacy organizations to address personal and family adjustment to blindness issues through counseling and peer mentoring

Objective 1.3: Develop and implement strategies to improve OFB’s performance on the required accountability measures under section 116 of WIOA.

Utilize agreements with the Office of Employment and Training (OET) to access wage data in order to capture 2nd and 4th quarter employment data for consumers.

Identify new partners and enhance existing partnerships to improve performance outcomes

Set baselines, identify successful outcomes and acceptable measureable progress

Develop strategies to improve performance outcomes

Work collaboratively with partners in the development, design and implementation of a system that captures the required data elements

Goal 1

Report of Progress:

OFB staff developed business relationships with several federal employers including the IRS, Census Bureau, SSA, and the VA. As a result we recruited 15 employees of which 6 have become successfully employed between these agencies.

OFB staff continue working with the National VR-NET businesses such as CVS and Conduent which is targeted recruitment work from home positions for candidates who use screen readers and positions with microsoft federal employers and sub-contractors regarding the mandate of the OFCCP.

OFB serves as a point of contact with the local coalition for Workforce Diversity that is comprised of areas employers.

Locally in Louisville staff are working with Metro Louisville to enhance opportunities for consumers that use screen reading software (transcribers positions with the local police department).

Staff provided sensitivity to manufacturing facilities enhancing awareness of potential talent in hiring individuals with disabilities. Staff on a regular basis provide consultation to business and industry to educate them regarding vocational rehabilitation services such as Amazon resulting in two hires. The employees use assistive technology magnification hardware to perform job tasks.

OFB staff worked collaboratively with Tampa Lighthouse in Florida to gain information in the provision of specific accommodations to a local hotel chain in the Louisville area. This project led to three interviews and one hire.

Provided follow-up asistive technology assessments for existing employees in several companies (i.e. Charter Communication, Humana, and LG&E) in order for individuals to advance upward in their positions.

OFB utilized the services of the advocacy organizations in mentoring two consumers that had significant barriers to employment.

There is representation of OFB staff on the Career Center Business Services Teams and staff have access to Salesforce in reporting employer contacts.

OFB through an agreement has access to wage data in order to capture 2nd and 4th quarter employment data for consumers. All the partners continue to work together in Kentucky on the design and implementation of a system that captures the required data elements.

Goal 2: Use resources effectively and efficiently in order to maximize funds in serving individuals who are Blind and Visually Impaired in the Commonwealth.

Objective 2.1: Maximize federal match dollars for the Vocational Rehabilitation Program.

Strategies

Research and explore all available options and opportunities.

Research allowable use of funds through the Establishment Grants for Match

Objective 2.2: Monitor ongoing fiscal and staff resources in order to maximize service dollars

Strategies

The Executive Leadership Team will review at a minimum on a quarterly basis data on numbers served, the number placed on a waiting list, and agency fiscal resources to determine the need to open or close categories.

Ongoing review of data from the case management system (i.e. application, referral and caseload trends).

Consultation with the State Rehabilitation Council regarding the administration of Order of Selection consistent with 34 CFR 361.36.

Objective 2.3: Maximize services in expending required percentages for Pre Employment Transition Services and SE services for the transition population.

Strategies

Monitor service provision and the draw down of funding.

Report of Progress:

In FFY 2015 and FFY 2016 combined, OFB relinquished over \$2.0 million in federal funds due to being under match and penalties for not maintaining the state effort. In 2017, OFB was able to draw down its full match; however it did this by borrowing ahead from General Fund Quarter allotments which is not a good fiscal practice. It is anticipated this year as a result of the work of Cabinet and Workforce staff the General Fund Budget will receive an increase that will allow for OFB and OVR to fully match their award.

OFB along with the Fiscal Integrity Budget Unit meet regularly to analyze the data regarding numbers service and the agency fiscal resources and the need to open or close categories. Based on OFB's burn rate of expended funds and available funds it is not feasible to serve any on the wait list and we are unable to open categories. Information was shared with the State Rehabilitation Council on a regular basis.

For OFB, the 15% requirement equates to spending approximately \$990,000 or 55% of our caseload dollars on this small population leaving 45% of our caseload dollars for approximately 1,400 individuals who are not in a secondary school. In Kentucky there are 73 school districts statewide consisting of 1,233 schools inclusive of 564 Visually Impaired Students and 18 Deaf Blind ages 3-21 according to the Kentucky Instructional Materials Resource Center (KIMRC). OFB worked collaboratively with the General agency in expending its carryforward dollars from 2016. OFB and OVR jointly submitted their Pre-Employment Transition Services fiscal forecasting plan and are on target to expend money for the FFY 17 and 18.

Goal 3: KBE will provide full—time employment and career opportunities for Kentuckians who are legally blind, while providing quality vending and food services for government and business.

Objective 3.1: Maximize training opportunities for vendors and KBE staff.

Strategies

Offer and conduct annual vendor training for potential licensees.

Offer and conduct annual upward mobility training for current vendors.

Offer and conduct training for KBE staff.

Objective 3.2: Provide new vending opportunities.

Strategies

Communicate with federal and state agencies to acquire new locations.

Work with the State Blind Vendor committee to seek out possible opportunities.

Survey at least one potential location each month as opportunities permit, with a minimum of 4 per year.

Objective 3.3: Improve existing vending locations.

Strategies

Actively seek potential satellite locations for assisting vendors and to enhance vendor income.

Utilize management resources to improve profit percentages.

Offer training and services to improve business practices

Report of Progress:

OFB held new vendor training in 2017 and licensed three new vendors. Two upward mobility training's were held for the topic areas of Set Asides conducted by Terry Smith and Sexual Harassment by the Kentucky Human Rights Commission and Business Enterprises Staff were included in these trainings. Kentucky Business Enterprises follow up on all potential site from the Government Services Administration (GSA). 2017 was a year in transition for the new Director of Kentucky Business Enterprises. Currently we are in process of looking a three new potential locations. The vendor set aside funds were utilized in 2017 for purchase of new equipment to upgrade operations.

Goal 4: Recruit, employ, retain and train the most qualified and highly skilled rehabilitation staff which reflects employment focused, job driven outcomes.

Objective 4.1: Increase the skills and competency levels of all rehabilitation staff statewide.

Strategies

Maximize training funds to support staff in professional training and development activities.

Provide quality training statewide that is job specific and targeted to address any deficiencies identified in quality assurance reviews or training needs assessments.

Provide job—driven training that promotes skill enhance and employer engagement.

Objective 4.2: Improve services to underserved populations within the blind and visually impaired community, including substance abuse, mental health, and criminal background.

Strategies

Participate in cross training's with agencies who provide services to treat mental illness, substance abuse to provide all professionals a better understanding of the unique services necessary to improve outcomes for consumers.

Collaborate with criminal justice agencies to promote better understanding of issues that impact employment for consumers with backgrounds.

Reports of Progress:

Given budget constraints progress on this goal area was limited. Staff were provided training for those areas through quality assurance reviews deficiencies were identified and areas of concern voiced by staff through the training assessment were prevalent. Training occurred for changes in the case management system for 911 fields as well as on Pre-employment Transition Services. The Cabinet sponsored cross training for the area or team building. There was no progress for the area of substance abuse, mental health or criminal backgrounds.

Goal 5: Enhance and build Office for the Blind internal and external collaborative relationships and partnerships to advance opportunities for individuals to progress toward independence and employment.

Objective 5.1: Develop a marketing approach and plan to guide OFB's partnership efforts with eye physicians.

Strategies

Identify through WEBI existing eye physicians that serve as a regular referral source to each caseload.

Identify caseloads that do not have a regular referral flow from an eye physician.

Update marketing materials to clarify how to make appropriate referrals.

Objective 5.2: Increase available resources & seek to leverage funding, staff resources, in—kind and programmatic support & other forms of assistance from partners.

OFB will collaborate with other statewide partners increasing their capacity to serve individuals with disabilities, and will refer eligible individuals who can benefit from the resources and services available at no cost.

OFB staff will provide training for Career Center Partner Staff to increase knowledge and confidence in working with individuals who are blind and visually impaired.

Report of Progress:

A plan for marketing to eye physicians was developed and implemented. The main focus is the Spring Optometric Association Annual meeting event held annually. OFB identifies staff with lower referrals from eye physicians through WEBI reports and they are targeted to attend the event for networking purposes. Though the conference we receive a list of eye physicians throughout the state that is then distributed to staff for marketing and outreach purposes.

Through the Career Pathways Grant OFB has made a lot of progress in collaboration with statewide partners to increase capacity in serving individuals. Project CASE Career Pathways Coordinators provided all the liaison and coordination services for the following STEM Camps, which were held in Eastern Kentucky on the campuses of Big Sandy Community and Technical College, Southeast Community and Technical College, and Hazard Community and Technical College. The grant has allowed for enhanced connections with the system initiatives in the local workforce areas.

Goal 6: To engage youth, parents, high schools, and other transition specialists in exploring and planning career choices that connect to a full range of post—secondary options for training, career development, and competitive integrated employment.

Objective 6.1: To improve the number, quality, and rate of employment outcomes for youth and students participating in Transition services.

Strategies

VR Counseling Staff, school counseling and teaching staff, and VI teachers statewide will collaborate to achieve earlier involvement of OFB counselors in IEP development of vocational goals. OFB transition policies and practices used to guide the implementation and continuous improvement of services leading to employment will be based on the gathering and tracking data through the case management system.

Objective 6.2: Develop and implement a plan for PREETS services

Development and implementation of a plan for service delivery. Expansion of the Student “Employability Skills Boot Camp” (i.e. workplace readiness and independent living, counseling on training and education opportunities, self—advocacy, job exploration counseling). Development of more opportunities for workplace learning including paid work experiences and job shadowing.

Plan and conduct regional transition conferences.

Objective 6.3: Enhance student awareness of enrollment in transition programs

Promote summer transition programs through innovative marketing strategies in order to increase referrals. Implementation of marketing strategies to VI teachers, students and their families.

Report of Progress:

Path a summer transition program for students ages 14-21 who are blind and visually impaired was held at the Charles W. McDowell Center in Louisville during July. There were 16 students in attendance. Students participated in classes teaching blindness skills such as orientation and mobility, assistive technology and braille. Additionally, the curriculum had a focus on pre-employability skills such as local labor market information, career pathways, financial literacy and interest inventories. Students went off site for employment site tours and participated in recreational activities that provided for many their first exposure to those kinds of events.

The Kentucky School for the Blind Summer Work Program was held June 19-30. Through this program eighteen students had the opportunity to work at Kentucky Kingdom or the Louisville Zoo. Students were paid more than minimum wage for up to 55 hours of work experience over the two weeks of the program.

The Deaf-Blind Project's Expanded Core Curriculum Foundation to Transition Program was held in Lexington June 19-23. Eight students who Deaf-Blind participated in this program, which focuses on the expanded core curriculum for students who are Deaf-Blind. Four students who attended last year returned this year to act as mentors for 4 new students.

INSIGHT was held June 10-17 at Morehead State University. 21 students from across Kentucky completed the program, which gave them an opportunity to experience college life through attending college level classes, staying in a dorm, eating in a cafeteria, and participating in social activities.

The Kentucky Office for the Blind set the following goals for the distribution of Title VI, Part B Funds.

Goal 1: Increase supported employment outcomes and other supports to assist individuals who are blind and visually impaired with most significant disabilities Develop and release an RFP for establishment grants for CRPs to address integrated competitive employment for adults, students, and youth who are blind or visually impaired. Award and implement establishment grants. Leadership will continue to participate in statewide training meetings with CRP Directors and their staff to identify and resolve issues and share best practices to improve services for individuals who are blind and visually impaired, including youth with the most significant disabilities.

Reports of Progress:

OFB served 70 through Supported Employment (7 PEO;s)in 2016. Nine of these were youth with 2 PEO's. In 2017 there was an increase of two serving 72 (7 were youth) with seven PEO's of which none were youth. We still have a lot of work to do in this area. We did develop a policy on establishment grants and a request for proposal. Given staffing changes and the work on the merger of the two agencies we did not follow through on implementing the establishment grants.

Goal 2: OFB will identify and utilize internal and external resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities. OFB will utilize the expertise of the Human Development Institutes' Supported Employment Training Project at the University of Kentucky. OFB will attend training through the HDI project as well as in house training on policy updates and changes. OFB will work closely with APSE, Community Mental Health Centers, the Department of Behavioral Health, Developmental and Intellectual Disabilities to identify strategies to expand services to youth.

Reports of Progress:

OFB staff attending training through HDI and APSE. No progress was made on expanding services to youth.

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

This section was the submission of the Office of Vocational Rehabilitation on April 2, 2018 for the required Combined State Plan for Kentucky. GOAL I: To continuously improve customer service. IMPEDIMENTS: The interest rate will be rising on KATLC loans. GOAL II: To provide Pre—employment transition services (Pre—ETS) to Transition students (ages 14—21) and other transition services to Youth (ages—16—24) to assist them with transition from high school into competitive integrated employment or post—secondary training. IMPEDIMENTS: We find that the foster care referrals tend to move from place to place quickly, so we have to re—refer them to another office in their new area. It may take time to get an application completed. We have had cursory meetings with our state foster care partners to address this concern and have discussed plans to provide workshops/trainings in the future. GOAL III: Provide information concerning benefits planning and financial planning in order to promote inclusion, integration, and empowerment of individuals with the most significant and significant disabilities. IMPEDIMENTS: The SGA Project is almost two—thirds of the way done at this point. The WIPA Program for one half of the state is just now up and running. GOAL IV: To provide job placement and supported employment services in order for consumers with significant and most significant disabilities respectively to attain competitive integrated employment. IMPEDIMENTS: No impediments at this time GOAL V: To implement Section 511 of WIOA. IMPEDIMENTS: No impediments at this time 2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must: A. Identify the strategies that contributed to the achievement of the goals. GOAL I: Provide SE training for Counselors and Branch Managers. This training is ongoing for all staff by Central Office and at statewide trainings. GOAL II: Increase utilization of Supported Employment Services. There will be a CWTP Supported Employment consulting fee so transition students can have a seamless transition into competitive integrated employment. GOAL III: Recruit more Supported Employment providers. OVR will add at least 7 providers in different parts of the state and will look at any and all funding sources to achieve this goal in areas that are unserved or underserved. GOAL IV: Seek alternative methods for providing and funding long term support. OVR continually monitors the waiver system and encourages the utilization of Michelle P and the SCL waivers. GOAL V: Continually monitor CRP quality and compliance. The monitoring of the quality of progress notes is encouraged by OVR staff. Goal VI: Continually enhance and refine partnerships with CRPs by ensuring adequacy of fee schedules, provider competency and consumer satisfaction. Fee schedules are consistently looked at and adjusted as required. Goal VII: Increase the number of CRP's providing Customized Supported Employment services. Higher costs for CRP's for training and certification fees. Training is more extensive and challenging. B. Describe the factors that impeded the achievement of the goals and priorities. GOAL I: Provide SE training for Counselors and Branch Managers. IMPEDIMENTS: No impediments at this time GOAL II: Increase utilization of Supported Employment Services. IMPEDIMENTS: There may be some adjustment with utilizing this service with transition students. GOAL III: Recruit more Supported Employment providers. IMPEDIMENTS: There is a need for more funding to add providers to parts of the state where there are no providers or very few. GOAL IV: Seek alternative methods for providing and funding long term support. IMPEDIMENTS: No impediments at this time GOAL V: Continually monitor CRP quality and compliance. IMPEDIMENTS: Timeliness of notes is an ongoing challenge. Goal VI: Continually enhance and refine partnerships with CRPs by ensuring adequacy of fee schedules, provider competency and consumer satisfaction. IMPEDIMENTS: No impediments at this time GOAL I: Provide SE training for Counselors and Branch Managers. IMPEDIMENTS: No impediments at this time GOAL II: Increase utilization of Supported Employment Services. IMPEDIMENTS: There may be some adjustment with utilizing this service with transition students. GOAL III: Recruit more Supported Employment providers. IMPEDIMENTS: Finding funding to

do this GOAL IV: Seek alternative methods for providing and funding long term support. IMPEDIMENTS: No impediments at this time GOAL V: Continually monitor CRP quality and compliance. IMPEDIMENTS: Timeliness of notes is an ongoing challenge. Goal VI: Continually enhance and refine partnerships with CRPs by ensuring adequacy of fee schedules, provider competency and consumer satisfaction. IMPEDIMENTS: No impediments at this time

This section was the submission of the Office of the Blind on April 2, 2018 for the required Combined State Plan for Kentucky.

This is a reporting of the factors that impeded the achievement of goals for OFB for the VR program. There were three main factors that impeded progress on goals and priorities. The first factor was available staff resources as staffing levels dropped considerably for OFB over the past year and a half. With staffing levels at an all-time low it has been difficult to facilitate any systematic change or develop and implement new initiatives. Staff workloads are at capacity making it imperative that day to day basic operations are the focus. Staff have been focused on implementation of WIOA specifically pre-employment transition services, 511 and the changes needed in CMS for 911. The second factor is budget constraints making it difficult for expansion of programs or innovation given we are unable to fill positions at this time. The third is the impending reorganization and merger of the Office for the Blind and Office of Vocational Rehabilitation to a combined agency. Given at this time we are conducting a joint statewide needs assessment and developing joint goals and priorities we have not expended a lot of time on certain priorities that we know will change how we move forward in the strategic planning process. Currently we are in a state of transition and influx. Staff resources over the past year have been dedicated to the work of the reorganization. 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:

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.

This section was the submission of the Office of Vocational Rehabilitation on April 2, 2018 for the required Combined State Plan for Kentucky.

GOAL I: Provide SE training for Counselors and Branch Managers.

This training is ongoing for all staff by Central Office and at statewide trainings.

GOAL II: Increase utilization of Supported Employment Services.

There will be a CWTP Supported Employment consulting fee so transition students can have a seamless transition into competitive integrated employment.

GOAL III: Recruit more Supported Employment providers.

OVR will add at least 7 providers in different parts of the state and will look at any and all funding sources to achieve this goal in areas that are unserved or underserved.

GOAL IV: Seek alternative methods for providing and funding long term support.

OVR continually monitors the waiver system and encourages the utilization of Michelle P and the SCL waivers.

GOAL V: Continually monitor CRP quality and compliance.

The monitoring of the quality of progress notes is encouraged by OVR staff.

Goal VI: Continually enhance and refine partnerships with CRPs by ensuring adequacy of fee schedules, provider competency and consumer satisfaction.

Fee schedules are consistently looked at and adjusted as required.

Goal VII: Increase the number of CRP's providing Customized Supported Employment services.

Higher costs for CRP's for training and certification fees. Training is more extensive and challenging.

This section was the submission of the Office for the Blind on April 2, 2018 for the required Combined State Plan for Kentucky.

The Kentucky Office for the Blind set the following goals for the distribution of Title VI, Part B Funds.

Goal 1: Increase supported employment outcomes and other supports to assist individuals who are blind and visually impaired with most significant disabilities Develop and release an RFP for establishment grants for CRPs to address integrated competitive employment for adults, students, and youth who are blind or visually impaired. Award and implement establishment grants. Leadership will continue to participate in statewide training meetings with CRP Directors and their staff to identify and resolve issues and share best practices to improve services for individuals who are blind and visually impaired, including youth with the most significant disabilities.

Reports of Progress:

OFB served 70 through Supported Employment (7 PEO;s)in 2016. Nine of these were youth with 2 PEO's. In 2017 there was an increase of two serving 72 (7 were youth) with seven PEO's of which none were youth. We still have a lot of work to do in this area. We did develop a policy on establishment grants and a request for proposal. Given staffing changes and the work on the merger of the two agencies we did not follow through on implementing the establishment grants.

Goal 2: OFB will identify and utilize internal and external resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities. OFB will utilize the expertise of the Human Development Institutes' Supported Employment Training Project at the University of Kentucky. OFB will attend training through the HDI project as well as in house training on policy updates and changes. OFB will work closely with APSE, Community Mental Health Centers, the Department of Behavioral Health, Developmental and Intellectual Disabilities to identify strategies to expand services to youth.

Reports of Progress:

OFB staff attending training through HDI and APSE. No progress was made on expanding services to youth.

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

This section was the submission of the Office of Vocational Rehabilitation on April 2, 2018 for the required Combined State Plan for Kentucky.

GOAL I: Provide SE training for Counselors and Branch Managers. IMPEDIMENTS: No impediments at this time

GOAL II: Increase utilization of Supported Employment Services. IMPEDIMENTS: There may be some adjustment with utilizing this service with transition students.

GOAL III: Recruit more Supported Employment providers. IMPEDIMENTS: There is a need for more funding to add providers to parts of the state where there are no providers or very few.

GOAL IV: Seek alternative methods for providing and funding long term support. IMPEDIMENTS: No impediments at this time

GOAL V: Continually monitor CRP quality and compliance. IMPEDIMENTS: Timeliness of notes is an ongoing challenge.

Goal VI: Continually enhance and refine partnerships with CRPs by ensuring adequacy of fee schedules, provider competency and consumer satisfaction. IMPEDIMENTS: No impediments at this time

GOAL I: Provide SE training for Counselors and Branch Managers. IMPEDIMENTS: No impediments at this time

GOAL II: Increase utilization of Supported Employment Services. IMPEDIMENTS: There may be some adjustment with utilizing this service with transition students.

GOAL III: Recruit more Supported Employment providers. IMPEDIMENTS: Finding funding to do this

GOAL IV: Seek alternative methods for providing and funding long term support. IMPEDIMENTS: No impediments at this time

GOAL V: Continually monitor CRP quality and compliance. IMPEDIMENTS: Timeliness of notes is an ongoing challenge.

Goal VI: Continually enhance and refine partnerships with CRPs by ensuring adequacy of fee schedules, provider competency and consumer satisfaction. IMPEDIMENTS: No impediments at this time

This section was the submission of the Office of the Blind on April 2, 2018 for the required Combined State Plan for Kentucky.

This is a reporting of the factors that impeded the achievement of goals for OFB for the SE program. There were three main factors that impeded progress on goals and priorities.

The first factor was available staff resources as staffing levels dropped considerably for OFB over the past year and a half. With staffing levels at an all time low it has been difficult to facilitate any systematic change or develop and implement new initiatives. Staff workloads are at capacity making it imperative that day to day basic operations are the focus. Staff have been focused on implementation of WIOA specifically pre employment transition services, 511 and the changes needed in CMS for 911.

The second factor is budget constraints making it difficult for expansion and innovation given we are unable to fill positions at this time.

The third is the impending reorganization and merger of the Office for the Blind and Office of Vocational Rehabilitation to a combined agency. Given at this time we are conducting a joint statewide needs assessment and developing joint goals and priorities we have not expended a lot of time on certain priorities that we know will change how we move forward in the strategic planning process. Currently we are in a state of transition and influx. Staff resources over the past year have been dedicated to the work of the reorganization.

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

Kentucky is currently reviewing collected data and developing strategies to improve the collection and performance for the State's performance under the performance accountability measures of section 116 of WIOA. The current Kentucky OFB/VR Case Management System (CMS); a web—based system

used to collect required data, enforce work flow rules, verify data accuracy, authorize and pay for consumer services, and produce a variety of monthly and real time reports; was implemented in October 2008. The system is being edited for improvement in the collection and reporting of the required data.

The Education and Workforce Development Cabinet, Department of Workforce Investment is currently working to develop a single system for all of the data collection needs of the Department including the Office of Employment and Training, Office for the Blind and Office of Vocational Rehabilitation. This system is being developed in phases. The current system has been edited to meet the data collection requirements for common measures as well as the additional data elements required for RSA 911 quarterly reporting. We will continue to make changes identified as necessary to correct or improve that process. We anticipate that the new system will be available for OVR/OFB by 12/31/2019.

KEE Suite is the integrated case management system being developed for state agencies (OVR, OFB, OET, CHFS, Adult Ed, WIOA, etc.) to streamline services for program participants in the Commonwealth. It is currently planned to replace OVR/OFB's current case management system in the fall of 2019. We are in the beginning planning stages for the VR specific portion of the system. All information entered into the system will be shared on Permission based guidelines, set by the Agency(s) based on State and Federal Law. Shared Personally Identifiable Information (PII) that will be available to the participating partners in this system will be Common basic information requested and collected from the participant by each partner to streamline and simplify the process for the participant instead of the participant being required to answer and supply the same information multiple times, and to facilitate the federal reporting of the WIOA required Common Measures. VR specific data and records will be secured by access restrictions in place based on need to know.

Regardless of the system that the Agencies choose to implement, innovations that are anticipated include: paperless cases, electronic signatures, improved reporting access, increased electronic communication and corroboration among Department partners, and system generated notifications and reminders to increase productivity. In the interim, the current system is being modified to meet the data collection requirements for common measures as well as the additional data elements required for RSA 911 quarterly reporting. Once a baseline is determined and the relationship between services, partnerships, etc. and successful outcomes and measurable progress is analyzed, strategies will be developed to improve the performance outcomes.

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

This section was the submission of the Office of Vocational Rehabilitation on April 2, 2018 for the required Combined State Plan for Kentucky.

To support the activities of the Statewide Council on Vocational Rehabilitation (SCVR, Kentucky's SRC), including all meeting expenses and expenses related to conducting an annual survey of consumer satisfaction;

To support the activities of the Kentucky Statewide Independent Living Council (SILC), including all meeting expenses and the salary of a part—time SILC Coordinator (note: the SILC is currently in the process of transitioning from OVR to the Department for Aging and Independent Living (DAIL);

To conduct marketing activities for KYOVR, including the printing of brochures and other materials

This section was the submission of the Office of the Blind on April 2, 2018 for the required Combined State Plan for Kentucky.

In FY 2017, OFB expended \$35,650 in Innovation and Expansion for this area.

Funding in the support of the SRC for reimbursement of expenses and personnel costs for the agency designated liaison for the SRC. This includes: SRC Annual Report Publication, SRC Consumer Satisfaction Survey of all closed cases contracted through the University of Kentucky. Reimbursement of expenses in accordance with Section 105 (g) of the Act. A copy of the 2017 Satisfaction Survey Executive Summary, as well as the Survey Highlights, were distributed to SRC members, via email, prior to the SRC meeting, where a representative, from the University of Kentucky Human Development Institute will deliver a presentation for the Council on the Survey results in April. Overall, the results of the study indicate that consumers expressed high degrees of satisfaction with their experiences. Over ninety-seven (97.6%) of all participating consumers rated that services they received through the Office for the Blind as a 1 or 2 on a five-point scale where 1 = "excellent" and 5 = "poor". In addition, for those with a case closed successfully, 90.1% indicated that their needs were met through the services received by responding with a 1 or 2.

The SRC Planning Committee gave input in 2017 on the OFB State Rehabilitation Council's Annual Report. The theme for the Annual Report "Creating Possibilities" was approved by the full Council.

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.

Supported employment offers more than just the assistance needed to find and learn a job. It provides the necessary ongoing support to help an individual maintain employment. Kentucky has identified 81 supported employment providers throughout the state. Individualized strategies are also utilized to arrange for supported employment services outside of "organized programs" when necessary (i.e. coworkers at the job site may provide support paid for with various resources; independent supported employment specialists may be hired, etc.). More than three-fourths of Kentucky's 120 counties have access to supported employment programs. The lack of accessible and dependable transportation often limits access to supported job opportunities.

Extended support services are provided by each local supported employment program utilizing funds from a myriad of sources, including the Department for Behavioral Health, Developmental and Intellectual Disabilities (DBHDID), the Kentucky Council on Developmental Disabilities, city and county governments, United Way, fund-raising campaigns, PASS funding, Medicaid, Supports for Community Living Waiver funds, Michelle P waiver funds and other resources. Most programs utilize a combination of funding sources for the provision of extended support services. Natural supports are encouraged (such as co-workers, peers, etc.) and are carefully monitored by the supported employment provider.

Kentucky OVR's partner, the Department of Behavioral Health, Developmental and Intellectual Disabilities (DBHDID), has developed a new Medicaid Waiver that would more adequately fund supported employment services for people with developmental disabilities. The new Supports for Community Living Waiver 2 (SCL2) was rolled out during the 2014 calendar year. It has increased the fee structure and modified the service definitions for supported employment. Kentucky's supported employment programs have primarily served individuals with intellectual disability and individuals with chronic mental illness. This is largely due to greater availability of funding for extended support for these two groups. Individuals with other disabilities are served if funding for extended support is available and if the supported employment provider has the expertise to meet that individual's needs for employment training and support.

Kentucky has become the 12th state to participate in the Individual Placement and Support (IPS) model of supported employment, which is an evidenced-based practice. The goal is to demonstrate the effectiveness of the IPS model for supported employment for people with serious mental illness throughout Kentucky. In July 2011, four sites in Kentucky began pilot site implementation. In 2012, two sites were added. In 2013, three sites were added. In 2014 BHDDID required that all Community Mental Health Centers implement the IPS program as one of the four evidence based practices required in their state plan. A Statewide Coordinator, employed through the University of Kentucky, Human Development Institute, oversees the pilot sites.

A second coordinator was hired in late 2013. The Office of Vocational Rehabilitation and the Kentucky Division of Behavioral Health collaborate as Team Leading agencies for the project. The Kentucky Association for Persons in Supported Employment (KY APSE) has been successful in creating greater supported employment awareness among the legislators in Kentucky's General Assembly. These awareness/advocacy efforts will continue with the goal of increased statewide funding allocations and possible supported employment legislation to create a more solid funding base for extended services.

QUALITY Pursuant to federal regulations, supported employment services provided by approved vendors must contain these elements: 1) competitive work; 2) integrated work settings; and 3) provision of extended support services. In order to ensure that supported employment services are provided according to regulation, the following guidelines must be met: 1. Services will be provided for individuals with the most significant disabilities who have a documented need for supported employment services, including extended support services. 2. Work will be performed on a full-time or part-time basis. Each individual in supported employment and his/her OVR counselor shall jointly establish in the IPE an appropriate goal for the number of hours per week that will maximize the individual's vocational potential. 3. Work must take place in integrated settings where most workers do not have disabilities. 4. Wages must be in compliance with Fair Labor Standards Act. Each supported employee will have a goal of earning at least minimum wage. Kentucky's supported employment providers adhere to the following principles: •The supported employment concept assumes that all persons, regardless of degree of disability, have the capacity and should be afforded the opportunity to participate in real employment with appropriate support. •Emphasis is placed on recognizing and maximizing opportunities in the workplace rather than just providing skills training. •The purpose of the program is employment with all of the general expectations of a job such as wages, job security, and performing meaningful work. Job Development, rather than Job Placement is the focus. •Ongoing, extended supports are tailored to meet each individual's needs. •Individuals are offered choices in the selection and maintenance of jobs. Decisions about appropriate services are made jointly with the individual and/or the family, the supported employment provider, and the VR counselor. •Integration on the job site is recognized as necessary and important. Opportunities are available for non-work interactions with non-disabled workers. Interactions with non-disabled co-workers are a part of regular job responsibilities. "Natural supports" are developed and emphasized. •Extended services are proactive, not merely reactive. For example, plans are developed with individuals in anticipation of career advancement rather than merely waiting for a job loss, lay off, company closing, etc., before seeking other opportunities. The primary staff responsible for providing supported employment services are "job coaches," "job trainers," and/or "supported employment specialists." Positions are both full and part-time, depending on the size and service territory of the local provider. Training and Consultation for staff is provided by the Supported Employment Branch according to the needs of the provider. Supported Employment Training Project core values training is required for all vendors in the SE Outcome-based Reimbursement System. This is funded collaboratively using Department of Behavioral Health Developmental and Intellectual Disabilities/OVR dollars and is implemented by the Supported Employment Training Project at the University of Kentucky Human Development Institute. Technical assistance is also provided by the OVR

CRP Branch staff. A resource manual and other policies and guidelines memorandum were developed for vocational rehabilitation counselors. These are periodically revised and updated so that staff may better understand the rehabilitation process in regard to supported employment. This is a useful tool for supported employment providers as well. Seminars, workshops, and training/awareness sessions are arranged and/or participated in throughout the state with various agencies and organizations that can assist with funding, conversion, employment, and other related supported employment issues. Meetings of this nature are regularly held with such groups as The Arc of Kentucky, the Kentucky Commonwealth Council on Developmental Disabilities, Community Mental Health Centers, Kentucky Consortium for Values Based Training, KY APSE, Kentucky Rehabilitation Association and others. The quality of supported employment outcomes is assessed individually. Such issues as Consumer satisfaction, earnings, benefits, employee and employer satisfaction, the degree of integration, availability of dependable transportation, co-worker support, socialization, work environment, and provision of support services are important. On a regular basis, the CRP Branch staff conducts technical assistance visits with each provider for quality assurance purposes. As well, each supported employment provider has established on-going strategies to measure customer satisfaction. EXTENT As a part of the eligibility determination process for the Office of Vocational Rehabilitation services, supported employment will be considered as a possible vocational outcome for individuals with the most significant disabilities. The agency is now in an order of selection, serving individuals with the Most Significant Disabilities in Category 1 first. The Office of Vocational Rehabilitation will be able to provide supported employment services through approved vendors and/or individual providers.

These services include:

- A. Development of a Person Centered Employment Plan (PCEP) with recommendations for job-development;**
- B. Individually designed job development services, including assistance with job carving, reasonable accommodation, technology and/or other support strategies;**
- C. Intensive on-the-job skills training and other support services provided by supported employment specialists and/or co-workers and employers;**
- D. Time-unlimited follow-up services (including regular contact with employer, trainee, parent, guardian, or others deemed appropriate);**
- E. Other services needed to support the individual, such as travel, training, employment advocacy, non-employment advocacy, and counseling;**
- F. Development of a Long-Term Support Plan, which includes an outline of the extended support to be provided, and a plan for review and update. The amount, frequency and type of services will be based on the needs of each individual once eligibility is established for supported employment. If off-job-site monitoring is determined to be appropriate, the monitoring, at a minimum, will consist of two meetings per month with the individual and one meeting each month with the employer. Extended long-term follow-up support services will be the responsibility of other relevant state agencies, private organizations, and other sources of funding. These services will be considered and planned for prior to an individual receiving the services listed above. Vendor status is not approved unless assurance is made of the availability of extended support services. If extended services are not fully assured at the onset of the IPE, the Vocational Rehabilitation counselor and the OVR CRP Branch staff will participate with the provider in making arrangements for these services before the Vocational Rehabilitation case is closed. The Office of Vocational Rehabilitation conducted a statewide survey of field counselors to explore the need and availability of Customized Supported Employment services for individuals with the most significant disabilities. It was expected, due to Section 511 of WIOA, that there would be an increase in the need and demand for Customized Supported Employment Services. Fifty-six percent**

(56%) stated that there are Community Rehabilitation Program (CRP) providers in their area that provide CSE. However, 56% also states that it's not readily available due to limited staff or oversized caseloads. Around 79% of the counselor's state that only 3 or fewer of their individuals have been able to utilize this service due to lack of availability. When asked if there was a need for CSE in their area, overwhelmingly, 89% stated that there was a need. Over 77% stated that they have at least 4 or more consumers on their caseloads that could benefit from CSE. Over 42% state that they have at least 8 or more consumers that need this service.

As a result, the OVR is exploring possible contract scenarios to assist in making this service readily available to individuals with the most significant disabilities in the areas of the state that need it most. This need continues to grow, and the data retrieved from a recent survey illustrates this vividly.

The CRP Branch within the OVR is making this a main priority to ensure the needs of the individuals being served are met, which will assist them in accomplishing their vocational goals and dreams.

The timing of transition to extended services.

Transition from Title VI, Part B funds to various other individually-determined funding sources begins 30-days post-placement in the job. The transition to extended services funding is completed (generally) after 60 days on the job. Monitoring of services continues for a minimum of 30 additional days to assure that the job is stable. Extended services then continue by the provider indefinitely using funds other than Title VI, Part B. The VR case is closed when the supported employment provider, the VR counselor, and the consumer determine that stabilization has been achieved. Stabilization is measured for each individual by considering all circumstances including support needs, consumer choice and satisfaction regarding services, and employer feedback. Extended services are funded and made available without delay for youth with the most significant disabilities.

Extended Services are those services provided to individuals with the most significant disabilities, which may include youth with the most significant disabilities. Services may be provided by the State agency, a private nonprofit organization, employer or any other appropriate resource when the individual no longer receives support services from the agency. OVR will determine the need for and fund services on a case-by case basis dependent upon each individual's need for services. OVR will reserve and expend half (50%) of the State's allotment for the provision of supported employment services and extended services to youth with the most significant disabilities. Extended services will be available for youth without delay for a period not to exceed four years or until the youth no longer meets the definition of a youth with a disability. OVR will work with providers to ensure another source of extended services to available to there will be no interruption of services for individuals with significant disabilities.

2. THE TIMING OF TRANSITION TO EXTENDED SERVICES.

Transition from Title VI, Part B funds to various other individually-determined funding sources begins 30-days post-placement in the job. The transition to extended services funding is completed (generally) after 60 days on the job. Monitoring of services continues for a minimum of 30 additional days to assure that the job is stable.

Extended services then continue by the provider indefinitely using funds other than Title VI, Part B. The VR case is closed when the supported employment provider, the VR counselor, and the consumer determine that stabilization has been achieved. Stabilization is measured for each individual by considering all circumstances including support needs, consumer choice and satisfaction regarding services, and employer feedback. Extended services are funded and made available without delay for youth with the most significant disabilities.

Extended Services are those services provided to individuals with the most significant disabilities, which may include youth with the most significant disabilities. Services may be provided by the State agency, a private nonprofit organization, employer or any other appropriate resource when the individual no longer receives support services from the agency. OVR will determine the need for and fund services on a case-by case basis dependent upon each individual's need for services. OVR will reserve and expend half (50%) of the State's allotment for the provision of supported employment services and extended services to youth with the most significant disabilities.

Extended services will be available for youth without delay for a period not to exceed four years or until the youth no longer meets the definition of a youth with a disability. OVR will work with providers to ensure another source of extended services to available to there will be no interruption of services for individuals with significant disabilities.

CERTIFICATIONS

Name of designated State agency or designated State unit, as appropriate **Department of Workforce Investment**

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

Full Name of Authorized Representative: **Rebecca Cabe**

Title of Authorized Representative: **Acting Executive Director**

States must provide written and signed certifications that:

1. The designated State agency or designated State unit (as appropriate) listed above is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA, and its supplement under title VI of the Rehabilitation Act.*** **Yes**

2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the designated State agency listed above agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan , the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; **Yes**

3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations , policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;*** **Yes**

4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; **Yes**

5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. **Yes**

6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes
7. The Authorized Representative listed above has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; Yes
8. The Authorized Representative listed above has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes
9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement. Yes

FOOTNOTES

Certification 1 Footnotes

*** Public Law 113-128.**

**** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.**

Certification 2 Footnotes

*** All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.**

**** No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.**

***** Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.**

Certification 3 Footnotes

*** No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.**

**** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes**

ADDITIONAL COMMENTS ON THE CERTIFICATIONS FROM THE STATE

CERTIFICATION REGARDING LOBBYING — VOCATIONAL REHABILITATION

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

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

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

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

STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

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

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

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

Full Name of Authorized Representative: **Rebecca Cabe**

Title of Authorized Representative: **Acting 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 MAT_OCTAE@ed.gov

CERTIFICATION REGARDING LOBBYING — SUPPORTED EMPLOYMENT

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

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of

any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

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

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

STATEMENT FOR LOAN GUARANTEES AND LOAN INSURANCE

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

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

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

Full Name of Authorized Representative: **Rebecca Cabe**

Title of Authorized Representative: **Acting Executive 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 Yes

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: Yes

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,

XXIX. 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*

XXX. 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:

- XXXI. 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
- XXXII. AN INDIVIDUALIZED PLAN FOR EMPLOYMENT THAT MEETS THE REQUIREMENTS OF SECTION 102(B) OF THE REHABILITATION ACT , WHICH IS DEVELOPED AND UPDATED WITH TITLE I FUNDS, IN ACCORDANCE WITH SECTIONS 102(B)(3)(F) AND 606(B)(6)(C) AND (E) OF THE REHABILITATION ACT.

ADDITIONAL COMMENTS ON THE ASSURANCES FROM THE STATE

VII. PROGRAM-SPECIFIC REQUIREMENTS FOR COMBINED STATE PLAN PARTNER PROGRAMS

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and the Vocational Rehabilitation Program—and also submit relevant information for any of the eleven partner programs it includes in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program. If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II and III of that document, where specified, as well as the program-specific requirements for that program (available on www.regulations.gov for public comment). The requirements that a State must address for any of the partner programs it includes in its Combined State Plan are provided in this separate supplemental document. The Departments are not seeking comments on these program-specific requirements, which exist under separate OMB control numbers and do not represent requirements under WIOA. For further details on this overall collection, access the Federal eRulemaking Portal at <http://www.regulations.gov> by selecting Docket ID number ETA-2015-0006.*

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

JOBS FOR VETERANS' STATE GRANTS

The Jobs for Veterans' State Grants (JVSG) are mandatory, formula-based staffing grants to (including DC, PR, VI and Guam). The JVSG is funded annually in accordance with a funding formula defined in the statute (38 U.S.C. 4102A (c) (2) (B) and regulation and operates on a fiscal year (not program year) basis, however, performance metrics are collected and reported (VETS-200 Series Reports) quarterly (using four “rolling quarters”) on a Program Year basis (as with the ETA-9002 Series). Currently, VETS JVSG operates on a five-year (FY 2015-2019), multi-year grant approval cycle modified and funded annually.

In accordance with 38 U.S.C. § 4102A(b)(5) and § 4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) makes grant funds available for use in each State to support Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) staff. As a condition to receive funding, 38 U.S.C. § 4102A(c)(2) requires States to submit an application for a grant that contains a State Plan narrative, which includes:

A. HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG

Veterans and eligible persons will receive employment, training and job placement services at a local KCC office in a similar fashion to other customers. However, veterans and eligible persons will be

provided priority of service over non—veterans for all employment, training and job placement services in accordance with 38 U.S. Code (USC), Chapter 42.

Initial contact at a KCC visited by a veteran and other eligible person will be by an intake/assessment customer service staff member. This person will provide the veteran with a self—assessment form that determines if the individual is qualified as having Significant Barriers to Employment (SBE), and is to be referred to a DVOP specialist. OET will continue to emphasize and train KCC staff to identify those who are already in the system seeking services, those entering the KCC and those found by the DVOP conducting outreach that are consistent with these target populations. These targeted populations include: • special disabled or disabled veterans, as defined in 38 USC §4211(1) and (3); • homeless veterans and those veterans who are at—risk of becoming homeless (any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions in the individual’s or family’s current housing situation, including where the health and safety of children are jeopardized, and who have no other residence and lack the resources or support networks to obtain other permanent housing); • recently—separated service member, as defined in 38 USC §4211(6); • ex—offenders, as defined by WIOA Section 101(38); • veterans lacking a high school diploma or equivalent; • low—income veterans, as defined by WIOA Section 101(36); • 18 to 24 year—old veterans, as directed by the assistant director for Veterans Employment and Training (ASVET) in Veterans Program Letter (VPL) 04—14; • transitioning service members assessed as not meeting the Career Readiness Standards, as documented on DD2958 and active duty services members being involuntarily separated through a service reduction in force as described in (VPL) 07—14; and • wounded, ill or injured service members receiving treatment at a military treatment facility or a warrior transition unit and the spouses and family caregivers of such wounded, ill or injured service members as described in (VPL) 08—14.

B. THE DUTIES ASSIGNED TO DVOP SPECIALISTS AND LVER STAFF BY THE STATE; SPECIFICALLY IMPLEMENTING DVOP AND LVER DUTIES OR ROLES AND RESPONSIBILITIES AS OUTLINED IN 38 U.S.C. § 4103A AND 4104. THESE DUTIES MUST BE CONSISTENT WITH CURRENT GUIDANCE;

DVOP specialists provide intensive services to veterans with SBEs, other eligible veterans, and other eligible persons as specified by 38 USC §4103A, and at the direction of the ASVET through guidance contained in VPL 03—14, VPL 03—14 Change 1, VPL 03—14 Change 2, VPL 04—14, VPL 07—14 and VPL 08—14. DVOP specialists will provide a full array of employment, training and placement services to those veterans with one or more SBEs. DVOP specialists will also facilitate services through an effective case management strategy. DVOP specialists conduct an assessment, and provide services to veterans and eligible persons to include: • evaluation of skill levels and needs; • development of an Individual Employment Plan (IEP) to identify employment goals, appropriate objectives, and appropriate combination of services for the participant to achieve the employment goals; • coordination of supportive services with applicable providers; • assistance to KCC partners in providing services to veterans on a priority basis; and • conducting outreach to identify those veterans and other eligible persons, ensuring they receive appropriate intensive services, case management and other workforce services necessary to re— turn to meaningful, sustainable employment. LVER staff perform only those duties specified in 38 USC §4104(b), in accordance with guidance promulgated at VPL 03—14. These are related to direct outreach with businesses, and facilitation within the state’s employment service delivery system. LVER staff is assigned duties that promote veterans to businesses, business associations, and business groups. When business outreach is primarily conducted by a Business Services Team, the LVER will be included as an active member. Additional LVER activities and services include, but are not limited to the following: • planning and participating in job and career fairs; • coordinating with unions, apprenticeship programs, businesses and business organizations to promote employment and training programs for veterans; • informing federal contractors of the process to recruit qualified veterans; • promoting credentialing and licensing opportunities for veterans; and • conducting veterans’ programs training for all KCC staff.

The Intensive Services Coordinator will:

- ***Upon a veteran's being determined by local VR&E staff as "job ready" and suitable for services, or having completed education, vocational or other VR&E designated rehabilitation program, The ISC will notify the servicing KCC and DVOP of the individual's enrollment into the program and the employment and/or rehabilitation services plan, as outlined and provided by the VR&E.***
- ***Once initial contact with the program participant is confirmed, the ISC will send a personal communication to VETS and the VR&E staff to confirm initial enrollment into the program through the local Career Center.***
- ***Provide continuous monitoring and assessment of services by utilizing the Employ Kentucky Operating System (EKOS).***
- ***Monitor and assess services provided by the DVOPs and KCC staff to Chapter 31 veterans to ensure services are appropriate and being provided on a timely basis.***
- ***Act as a liaison between the KCC staff and VR&E staff to resolve conflicts and ensure smooth delivery of needed services.***
- ***Report VR&E procedural problems to the appropriate VR&E , KCC and VETS staff including the Veteran program Coordinator.***
- ***Coordinate, reconcile and distribute the Chapter 31 VETS 201 Report on a quarterly basis.***
- ***Inform the VR&E employment counselor when any participant fails to respond to communications form the DVOP or ISC. Recommend case closure if no contact has been established after 90 days.***

C. THE MANNER IN WHICH DVOP SPECIALISTS AND LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEM OR ONE-STOP DELIVERY SYSTEM PARTNER NETWORK;

Service delivery is conducted through an integrated delivery system within the KCC structure. Crosstrained, responsive customer service teams throughout the Commonwealth provide effective services. Upon arrival to a KCC, veterans with SBEs will be identified using a self—assessment form and if eligible they will be referred to the DVOP specialist for further assessment, services and intensive case management as required. LVER staff work with the Business Services Team to promote the hiring of veterans to employers. LVERs are key members of the Business Services Teams, providing information on current employer job openings, assisting employers seeking to hire qualified veterans, and actively promoting job—ready veterans to employers.

D. THE INCENTIVE AWARD PROGRAM IMPLEMENTED USING THE 1% GRANT ALLOCATION SET ASIDE FOR THIS PURPOSE, AS APPLICABLE;

Kentucky does not participate in the Incentive Award program.

The governor suspended indefinitely the Employee Recognition Awards Program, vehicle used to pay incentive awards, in September 2010. It has not been reinstated by the current governor.

E. THE POPULATIONS OF VETERANS TO BE SERVED, INCLUDING ANY ADDITIONAL POPULATIONS DESIGNATED BY THE SECRETARY AS ELIGIBLE FOR SERVICES, AND ANY ADDITIONAL POPULATIONS SPECIFICALLY TARGETED BY THE STATE WORKFORCE AGENCY FOR SERVICES FROM ONE-STOP DELIVERY SYSTEM PARTNERS (E.G., NATIVE AMERICAN VETERANS; VETERANS IN REMOTE RURAL COUNTIES OR PARISHES);

Kentucky possesses the capacity and capability to serve all veterans. DVOP Specialists, however, only serve those veterans with SBEs, and other targeted populations as directed by the Secretary. These

include: • special disabled or disabled veterans, as defined in 38 USC §4211(1) and (3); • homeless veterans and those veterans who are at—risk of becoming homeless; • recently—separated service member, as defined in 38 USC §4211(6); • ex—offenders, as defined by WIOA Section 101(38); • veterans lacking a high school diploma or equivalent; • low Income veterans, as defined by WIOA Section 101(36); • 18— to 24—year—old veterans, as directed by the assistant director for Veterans Employment and Training (ASVET) in Veterans Program Letter (VPL) 04—14. • Transitioning service member assessed as not meeting the Career Readiness Standards, as documented on DD2958 and active duty services members being involuntarily separated through a service reduction in force as described in (VPL) 07—14; • Wounded, ill or injured service members receiving treatment at a military treatment facility or a warrior transition unit and the spouses and family caregivers of such wounded, ill or injured service members as described in (VPL) 08—14 ;• Chapter 31 VR&E veterans .

LVER staff indirectly serve veterans through direct business outreach to promote the hiring of qualified veterans and obtain job orders for review of potential cross—match with veterans seeking employment.

Although Kentucky does not have federal or state recognized Native American tribes, there are several Native American organizations and groups. State workforce reports through Sept. 30, 2015, show that 1,248, or 0.6 percent of all participants registered with the Kentucky workforce system are Native Americans, of which 219 are veterans (1.2 percent of all veterans registered). Kentucky intends to coordinate activities and resources with Native American organizations as appropriate. This includes invitations to job fairs and hiring events, providing marketing materials, and providing information on employment and training services, emphasizing veteran's priority of service.

F. HOW THE STATE IMPLEMENTS AND MONITORS THE ADMINISTRATION OF PRIORITY OF SERVICE TO COVERED PERSONS;

The U.S. Department of Labor (DOL) has issued regulations implementing priority of service for veterans and other eligible persons required by the Jobs for Veterans Act (JVA). The JVA mandates that priority of service shall be implemented by all “qualified job training programs,” further defined as “any workforce preparation, development or delivery program or service that directly funded, in whole or in part, by the Department of Labor.” Subsequent regulations implemented under policy guidance issued by the Employment and Training Administration provides further guidance on how priority of service is to be applied across all new and existing qualified job training programs.

Veterans and other eligible persons identified at the point of entry into the service delivery system will be notified of programs and services for which they may receive priority of service. “Point of Entry” includes both KCC locations as well as web—based and other virtual service delivery systems.

All Workforce Investment Boards (WIB) and KCCs will ensure their plans provide strategies and policies for providing veterans and other eligible persons with priority of service. Policies implemented will ensure that veterans and other eligible persons are aware of their entitlement to priority of service, the array of programs and services available to them, and any eligibility requirements for those programs and/or services.

Monitoring the administration of priority of service within the service delivery system consists of re—views of individual records to ensure eligibility, notification, and referrals as required are documented accurately. Additionally, reviews of the Commonwealth's static and ad—hoc reports are conducted to measure priority of service indicators in activities, services, and referrals. Further, annual assessments and state—initiated KCC office validation visits include screening for signage notification of priority of service, as well as reviews of documentation and staff interviews to ensure priority of service is understood and administered appropriately.

The State Veterans' Program Coordinator (SVPC) will continue to conduct training workshops on priority of service provisioning to all KCC office staff and WIB staff as appropriate.

G. HOW THE STATE PROVIDES OR INTENDS TO PROVIDE AND MEASURE, THROUGH BOTH THE DVOP AND ONE-STOP DELIVERY SYSTEM PARTNER STAFF:

1. JOB AND JOB TRAINING INDIVIDUALIZED CAREER SERVICES,

All KCC DVOP specialists and partner staff provide job and job training individualized career services in addition to job—driven training and placement services through direct services and referrals to KCC partners. The DVOP specialist and/or the partner staff member, working with the participant, mutually agree on the individualized services the participant requires and will receive.

2. EMPLOYMENT PLACEMENT SERVICES, AND

Employment placement services may be provided in two ways. The participant may receive direct services from a KCC DVOP specialist and/or partner staff, both as an initial visit and follow—up meetings and case management sessions. Alternatively, the participant may conduct self—directed assistance in resume writing, job searches, and career exploration options for education and employment goal attainment through the Commonwealth's Focus Career function via the Kentucky Career Center website.

3. JOB-DRIVEN TRAINING AND SUBSEQUENT PLACEMENT SERVICE PROGRAM FOR ELIGIBLE VETERANS AND ELIGIBLE PERSONS;

All veterans and eligible persons will be provided local labor market information along with current training programs tailored to the economic sectors for that region by either the DVOP, KCC staff or partner agency staff. Upon completion of the training program, veterans will be registered into the Focus Career system for job matching and placement. Additionally, DVOP and KCC staff will provide referrals as required for all veterans completing training.

Success will be measured by the number of veterans and eligible persons training enrollments, completion of training and employment outcomes.

H. THE HIRE DATE ALONG WITH MANDATORY TRAINING COMPLETION DATES FOR ALL DVOP SPECIALISTS AND LVER STAFF; AND

Please see attached spreadsheet for DVOP and LVER staff information here: kwib.ky.gov/VetStaff.xlsx Kentucky JOBS FOR VETERANS STATE GRANT (NVTI Required Training Completion Date)

As of 8/5/2014

Grant Funded Staff Name (Last Name, First Name) Date Appointed to Current Position

NVTI Required Training Completion Date

Central Office 275 East Main St

Frankfort, KY 40621

Kuhn, David 10/16/2006

4/18/2007

White, Ernest 10/16/2006

10/31/1997

Kentucky Career Center

1844 Carter Ave Ashland, KY 41105

Richard, Steven 8/16/2011

6/15/2012 White, Greta 10/16/2011

1/27/2012

Kentucky Career Center

803 Chestnut St Bowling Green, KY 42102

Walbert, Donald 5/16/2014

10/24/2014

McGlothlin, Donald 7/16/2012

1/27/2012

Kentucky Career Center

310 Roy Kidd St Corbin, KY 40701

Victor, Jordon 5/16/2014

8/23/2014

Kentucky Career Center

1324 Madison Ave Covington, KY 40701

Schweinzger, Thomas 3/1/2001

2/14/2006

Kentucky Career Center

8020 Veteran Memorial Dr Florence, KY 41042

Woche, Kenneth 12/17/2002

1/24/2006

Kentucky Career Center

233 Ring Road Suite 100

Elizabethtown, KY 42702

Cruz, Hector 6/1/2003

1/24/2006

Shorter, Robert 6/16/2014

2/25/2011

Kentucky Career Center

1121 Louisville Road Ste 6

Frankfort, KY 40601

Quire, Bruce 5/2/2011

3/9/2012

Kentucky Career Center

100 Technology Court, Suite B Georgetown, KY 40324

Bell, Charles 10/1/2003

2/14/2006

Kentucky Career Center

1055 Industry Road Lexington, KY 40505

Church, Nathan 4/18/2011

8/5/2011

Jones, Brian 8/1/2014

2/1/2016

Kentucky Career Center

600 West Cedar St Louisville, KY 40202

Tedford, Frank 12/1/2014 .

6/17/2015

Hinkle, Cathy 5/1/2014

11/6/2015

Kentucky Career Center

6201 Preston Hwy Louisville, KY 40219

Potts, William 1/16/2013

6/21/2013

Mattingly, Irv 9/1/2005

2/14/2006

Kentucky Career Center

56 Federal St Madisonville, KY 42431

Eaves, Charles 12/16/2014

2/5/2016

Kentucky Career Center

3108 Fairview Drive

Owensboro, KY 42351

DVOP Vacant

Kentucky Career Center

416 S. 6th St. Paducah, KY 42002

Tinsley, Randall 5/16/2014

8/22/2014

Kentucky Career Center

686 North Lake Dr. Prestonsburg, KY 41653

McBrayer, Jerry 3/1/2005 1

1/29/2005

Lanning, Larry 11/16/2011

3/1/2013

Kentucky Career Center

2028 Merrick Drive Richmond, KY 40475

Jones, Denise 1/16/2013

6/7/2013

I. SUCH ADDITIONAL INFORMATION AS THE SECRETARY MAY REQUIRE.

UNEMPLOYMENT INSURANCE (UI)

The Unemployment Insurance (UI) program requires a State Quality Service Plan (SQSP) on a 2-year planning cycle that is a condition of receipt of administrative funding to administer the program. The SQSP is the State's UI performance management and planning process that allows for an exchange of information between Federal and State partners to enhance the UI program's ability to reflect their joint commitment to performance excellence and client-centered services. A formal two-year SQSP is submitted biennially. On the off years, States may be required to modify the SQSP with additional corrective action plans and narrative if they are failing any new performance measures, and they are required to provide updated budget documents, certifications, and assurances. ETA Handbook No. 336, 18th Edition provides detailed guidance for the preparation and submittal of the SQSP and supplemental guidance is provided in an annual UIPL, issued as UIPL 21-14 for the FY 2015 SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chose to submit their SQSP through the Combined State Plan process.

A. CONTENTS OF A COMPLETE UI SQSP PACKAGE

A complete UI SQSP package includes the following documents, as described in Chapter 1, ETA Handbook 336, 18th Edition:

1. TRANSMITTAL LETTER

A cover letter to the appropriate Regional Office (RO) transmitting all the required SQSP documents.

Mr. Les Range Regional Administrator Employment and Training Administration U. S. Department of Labor 61 Forsyth Street SW Atlanta, Georgia 30303

August 22, 2018

Dear Mr. Range,

Enclosed is the Kentucky Office of Employment and Training, Unemployment Insurance State Quality Service Plan for Federal Fiscal year 2019. All pages required from Kentucky are included in this plan.

We appreciate the support we have always received from the Atlanta Regional Office. If you have any questions regarding the plan or need any additional information, please contact Brian Gustafson, Unemployment Insurance Quality Control Manager at (502) 782-3196.

Sincerely,

Katie Houghlin

Director, Division of Unemployment Insurance

Kentucky Office of Employment and Training

The signed copy of the Transmittal Letter is maintained with the State Agency and the Regional Office.

2. BUDGET WORKSHEETS/FORMS

Budget worksheets/forms and plan for program administration based on projected allocations received from the Federal partner. These forms include Worksheet UI-1 and SF 424, SF 424A and SF 424B. The SF 424A is only required if the State vary the quarterly distribution of base claims activity staff years.

The title: Application for Federal Assistance SF-424. Description: Unemployment Insurance Administration. Funding total: \$24,766,388. Project start: 10/01/2018. Project end date: 9/30/2019. Name of authorizing representative; John Pallasch. The signed copy of the SF 424 and other appropriate budget-related forms are maintained with the State Agency and the Regional Office.

3. THE STATE PLAN NARRATIVE

The State Plan Narrative is a vital element of the SQSP that provides a vehicle for sharing with the Federal partner State-specific efforts that affect the administration of the UI Program. The State Plan Narrative allows the State to describe in a single narrative: a) State performance in comparison to the Government Performance Review Act goals; b) actions planned to correct deficiencies regarding UI programs, UI program reviews and reporting requirements; and c) results of customer satisfaction surveys (optional).

STATE PLAN NARRATIVE

KENTUCKY FY 2019 and 2020

A. Overview

1. State Priorities and the strategic direction the state has adopted to ensure continuous improvement.

Kentucky will transform the workforce development system through innovative practices which enhance sustainable economic and job growth to improve the lives of Kentuckians. Through the following, Kentucky will ensure collaboration with key partners and continuous improvement statewide in the workforce investment system; Branding/Identity, One-Stop Certification, National Career Readiness Certification (NCRC), Work Ready Communities, and High Performing Workforce Boards. A comprehensive rebranding of our workforce system offices to Kentucky Career Center name

and logo will address the architecture of the entire system including One Stops, online services, and other public interfaces. Unifying promotional efforts will transform the identity of the “unemployment office;” increase the awareness and use of online job matching and training services; increase the use of our job portal Focus Career and Focus Talent by employers and job seekers; reduce confusion for those unfamiliar with the system by simplifying the message and increasing the efficiency of statewide outreach; and increase communication among all service delivery points by unifying them under one brand. The Commonwealth also has implemented Focus Suites that features a job seeker portal called Focus/Career, an employer portal called Focus/Talent and a staff portal called Focus/Assist. For example, within the Focus/Career portal, job seekers can create and/or update their resume. Focus/Talent is utilized by employers who prefer to enter their company information and job posts, which are automatically processed into the EKOS database. These enhancements have streamlined the process and are assisting job seekers in maintaining and updating resumes as additional training is received.

Kentucky updated the worker profiling model to better identify and help claimants who are unlikely to return to their previous job and therefore are likely to exhaust their UI claim. Kentucky’s Unemployment Insurance Division along with the Division of Workforce and Employment Services are working with Office of Technical Services (OTS) to create a new model. The current model was last updated in 1997 and has never been revised. The current model is completed by a staff member weekly and is a combination of manual and computer based selection of claimants. The new model will be completely automated and allow coefficients to be updated on a yearly basis without having to rebuild the entire model. To monitor this plan the statewide system will use EKOS data and Unemployment Insurance Wage Records to evaluate the effectiveness of the services to customers and employers, as well as the level of interaction among partners. Through a series of reports designed specifically to utilize this data, the Commonwealth can identify statewide and regional trends to make changes and improve the service delivery system.

2. Assessment of past performance and expected future performance. Includes, at state discretion, a discussion of external factors that may have performance implications.

Kentucky’s First Payment Promptness for the review period (4/01/2017 to 3/31/2018) was 66.17% (below the Acceptable Level of Performance (ALP) of $\geq 87\%$). Kentucky expects First Payment Promptness % of all 1st payments within 14/21 days after the compensable week to be \geq ALP of 87% by 09/30/2019. First Payment Promptness Intrastate 14/21 Days for FY 2018 was 65.67% (below the ALP of $\geq 87\%$). Kentucky expects its First Payment Promptness Intrastate 14/21 Days to be \geq ALP of 87% by 09/30/2019. First Payment Promptness Interstate 14/21 Days for FY 2017 was 68.04% (below the ALP of $\geq 70\%$). Kentucky expects First Payment Promptness Interstate 14/21 Days to be \geq ALP of 70% by 3/31/2019. Nonmonetary Determination Time Lapse of 59.09% (below the ALP of $\geq 80\%$). Kentucky expects that its Nonmonetary Determination Time Lapse to be \geq ALP of 80% by 09/30/2019. Improper Payments Measure during the period 1/1/2017 to 12/31/2017 was 20.38% (over the ALP of

KAR 1:070 regulation change went before the Kentucky General Assembly and was enacted December 2017 changing the protest period from 15 days to 10 days for mailed Notice of Claims and 12 days for electronic Notice of claims. Kentucky implemented changes in January 2018. This has removed the barrier of employers waiting 15 days to respond to adjudicators. These timelier employer responses will result in less time needed to resolve issues and quicker first payment promptness.

Kentucky submitted Data Validation - Benefits: Population 3, Population 12-14, and Module 4 with a failing report validation. Kentucky expects to submit with passing score Data Validation - Benefits Population 1 thru Benefits Population 11 by 12/31/2018, Data Validation - Benefits Population 12 thru Benefits Population 15 by 03/31/2019 and Data Validation - Benefits Module 4 by 06/30/2019. Kentucky submitted Data Validation - Tax Population 4 and Module 4 with failing report validation.

Kentucky expects to submit with passing score Data Validation Tax Population 1 thru Tax Population 5 by 12/31/2018 and Data Validation - Tax Module 4 and Tax Module 5 by 03/31/2019.

BAM Operations Complaint for the period 7/1/2016 to 6/30/2017 BAM 60 day paid timeliness was 50.19% (below the ALP of 70% within 60 days). BAM 60 day nonseparation timeliness was 31.28% (below the ALP of 60% within 60 days). BAM 60 day monetary timeliness was 48.1% (below the ALP of 60% within 60 days). BAM 90 day monetary timeliness was 77.1% (below the ALP of 85% within 90 days). Kentucky expects monetary and nonseparation timeliness to be => 60% for denied cases within 60 days of ALP by 03/31/2019. In addition, Kentucky expects paid timeliness to be => 70% for paid cases with 60 days of ALP by 12/31/2019. The BAM NDNH hit file was not in compliance due to the W-4 thru day was less than the key week plus 30 days. Kentucky is working with the Commonwealth Office of Technology and On Pointe to meet compliance with DOL standards and expect the BAM NDNH hit file to be in compliance by 12/31/2018.

Establishing Tax Accounts Promptly was at 86.81% (above the ALP of >70% of new accounts within 90 days).

Kentucky had an Incorrect Recording of Issue Detection Date of 69.66% which is below the Target Correct Detection Date of 95.0% for Nonmonetary Determination Issue Detection for the review period. Kentucky expects the Issue of Detection Date to be => ALP of 95% by 12/31/2019.

Benefit Accuracy Measurement (BAM) Improper Payment Rate by Cause during the period 1/1/2017 to 12/31/2017 was 20.38%. The top cause for Kentucky was ES Registration with percent of dollars paid of 75.75%, percent of dollars over paid (OP) of 16.43%, and an estimated amount of \$45,839,074. The second top cause was Separation Issues with percent of dollars paid of 9.16%, percent of dollars OP of 1.99%, and an Estimated Amount of \$5,552,024. The third top cause was Benefit Year Earnings (BYE) with percent of dollars paid of 6.34%, percent of dollars OP of 1.37%, and an estimated amount of \$3,822,248.

Kentucky's Facilitate Reemployment for during the period 1/1/2017 to 12/31/2017 was 56.4% (below the ALP of 67.7%). Kentucky expects to have a Facilitate Reemployment rate above the 68% ALP by 12/31/2020.

Detection of Benefit Overpayments has an ALP rate of at least 61.4% of detectable, recoverable overpayments. Kentucky detected 65.32% of Benefit Overpayments which was above the ALP of 54.5%.

3. Coordination with other plans.

Central office staff will produce and share quarterly data on the local Kentucky Career Center hub offices, regions and system-wide statistics. Kentucky will also provide staff support to assist any customer who asks to be contacted and will share details of those customer interactions on a real-time basis with the appropriate hub office and regional staff. Employers and customers are encouraged to go to the website and take the survey. This customer-focused initiative will continue to build brand recognition.

B. Federal Emphasis on the Government Performance and Results Act (GPRA)

1. State Performance compared to the GPRA goals.

For the review period, the Percent of Intrastate Payments Made Timely increased %0.36 from 65.81% to 66.17% (below the GPRA of 87%). Detection of Recoverable Overpayments increased 45.37% from 55.3% to 100.67% (above the GPRA of 54.5%). Reemployment Rate for Unemployment Insurance Claimants increased by 0.4% from 56.0% to 56.4% (below the GPRA of 67.0%). Establishing Tax Accounts Promptly increased .46% from 86.35% to 86.81% (below the GPRA of 89%).

2. Actions planned to achieve GPRA goals and targets.

To improve the percent of Intrastate Payments Made Timely, Kentucky will continue to monitor and enforce the regulatory requirements of 787 KAR 1:070 to ensure employer protests are received timely. This will reduce the time it takes to complete an investigation, resolve issues, and make first payments. Kentucky is reviewing all correspondence and questionnaires shared with our customers for readability, understandability, and efficacy. Revisions are ongoing to ensure all communications are targeted and written with Kentucky's Unemployment Insurance customers/audience in mind. Moreover, all interactive questionnaires are being revised to ensure that the questions posed are concise and tailored to efficiently glean all pertinent information necessary to make a well-reasoned determination in a timely manner, meet Federal timeliness and quality standards, and make prompt first payments. Kentucky has developed an internal tool (interactive elements manual) that is a spreadsheet based questionnaire utilizing decision tree technology. This tool will be available to all adjudicators. The interactive elements manual will assist the adjudicator in performing an effective investigation by following the most efficient questioning convention and will also internally track the efficacy of the interview vis-à-vis Benefits Timeliness and Quality criteria. Kentucky is currently utilizing the Equifax Portal to retrieve relevant and material information, decrease the time it takes to complete an investigation, and improve First Payment timeliness. Kentucky has conducted User Acceptance Training (UAT) on Liquid Office, a web-based solution for creating, routing and managing electronic forms. The interactive nature of this software will reduce the time it takes to request and receive critical information and documentation from claimants and make first payments. Kentucky is automating the issue assignment process with an internal Seibel based program (Assignment Manager). This will optimize the issue assignment process, emancipate resources, and improve Non-Monetary timeliness. Assignment manager is in the development stage and will proceed as resources permit. This will reduce the time necessary to make accurate and timely first payments. Kentucky is leveraging technology to address training needs. Specifically, Kentucky's interactive training modules initiative. These modules are designed to address specific issues, processes, and procedures in an interactive format including tests designed to gauge information retention, understanding and practical applications. The initiative is a comprehensive and holistic approach to disseminating critical program information. Kentucky currently has six training modules vetted and ready for distribution. These modules will increase the adjudicators' skillsets and issue awareness and thereby decrease the time it takes to identify and resolve issues and make accurate and timely first payments.

To increase the Reemployment Rate for Unemployment Insurance Claimants, the Commonwealth will transform the workforce development system through innovative practices which enhance sustainable economic and job growth to improve the lives of Kentuckians. Kentucky identified three key areas to focus attention: Outdated RESEA Model, Ineffective Orientation Meetings, and Insufficient Career Coaching and Case Management, the work continues to revamp these areas. Kentucky will revise outdated RESEA profiling model by including more customers in excluded zip codes. Kentucky will create and review reports that will detail the impact of the increased number of customers. Once an acceptable model has been determined, the revised RESEA model will implemented across all regions. The revised curriculum will place more focus on comprehensive IEPs, individualized Career Counseling and in-depth job searching techniques. Kentucky will review the revised processes and curriculum to ensure the enhanced revisions will have a positive impact on our customers. Once the process and curriculum selected and standardized, Kentucky will implement the revised curriculum across all regions. We will develop curriculum that enhances employment services to the first time payments and RESEA customers. These customers are a result of listings that are pulled weekly to identify potential reemployment customers most in need of services. Kentucky will create and review reports that detail the number increased from the enhanced services provided to customers. Moreover, Kentucky will implement the revised case management curriculum. Kentucky will upgrade its case management and services software in October of 2018 to Kentucky Enterprise Engagement

Suite (KEE-Suite) to streamline how customers and partners engage with the Kentucky. KEE-Suite enables us to streamline common functions and enterprise services, and lays the foundation for creation of an intuitive, intelligent and integrated system.

To improve the prompt establishment of Tax Accounts, Kentucky has improved its online employer registration. We continues to see increases in timeliness for new employer accounts due to the recent updates to the registration process. As we continue to educate employers, payroll providers, and local CPA's to use our website registration for new accounts, we foresee even better percentages in the future. Our new employer account registration also assists us in catching successorship sooner, asking new employers if they have inherited a business that already existed in Kentucky. The website now allows for account closure requests, asking the employer if the reason they are closing their account is related to a transfer of business. While all of these modernizations will take several quarters to see accurate and complete results, it is already clear that the results can only move our percentages in a positive direction.

C. Program Review Deficiencies

1. Causes for failure to conduct required reviews/activities, e.g., Benefit Payment Control, Internal Security, Benefit Accuracy Measure, and Tax Performance System.

2. Plans to conduct the reviews required.

D. Program Deficiencies

1. Plans to correct deficiencies identified through required program reviews, e.g., deficiencies identified during an internal security review.

No deficiencies have been identified through required program reviews.

E. Reporting Deficiencies

Kentucky was untimely in meeting the standard for UI Reporting Requirements for the AR 9048 due to a transition of management in the Quality Control Branch. This report is done through partnership with the Division of Workforce Investment and the Commonwealth Office of Technology. In the time period specified, there was no plan in place to ensure cooperation between the agencies and timeliness of the compilation of the report required. The Quality Control Branch manager has since established these partnerships in order to avoid similar untimeliness in the future. Guidelines for the AR9048 will be clearly outlined and communicated to all parties involved by 12/31/2018.

F. Customer Service Surveys

G. Other (e.g., approach to maintaining solvency, request for technical assistance)

H. Assurances

By signing the SQSP signature page, the state administrator certifies the following assurances, and that the state will institute plans or measures to comply with the following requirements:

A. Assurance of Equal Opportunity (EO).

B. Assurance of Administrative Requirements and Allowable Cost Standards.

C. Assurance of Management Systems, Reporting, and Recordkeeping.

D. Assurance of Program Quality.

E. Assurance on Use of Unobligated Funds.

F. Assurance of Prohibition of Lobbying Costs (29 CFR Part 93).

G. Drug-Free Workplace (29 CFR Part 98).

H. Assurance of Contingency Planning.

Provide the most recent dates for the following:

- **Information Technology (IT) Contingency Plan Implemented:** The Mainframe Disaster Recovery Plan was first implemented on 10/31/2013. The UI IT Contingency Plan covering the Central Office was first implemented on 7/13/2012. it was fully completed and implemented as of 6/14/2018.
- **IT Contingency Plan Reviewed/Updated2:** The Mainframe Disaster Recovery Plan was updated as of 6/14/2018. The UI IT Contingency Plan was completed and implemented as of 8/21/2018.
- **IT Contingency Plan Tested3:** The Mainframe Disaster Recovery Plan was tested in 6/14/2018, with findings resulting from the test included in the update published 8/21/2018. The UI IT Contingency Plan was completed and implemented on 6/14/2018.

i. Assurance of Conformity and Compliance.

j. Assurance of Automated Information Systems Security.

Provide the most recent dates for the following:

- **Risk Assessment Conducted4:** Completed by SeNet International and approved for release 8/21/2018.
- **System Security Plan Reviewed/Updated5:** Last Completed by SeNet International and approved for release 8/21/2018.

k. Assurance of Confidentiality

4. CORRECTIVE ACTION PLANS (CAPS)

Corrective Action Plans (CAPs): CAPs are expected as a part of the SQSP when State's annual performance does not meet the established criteria for core measures, Secretary's Standards, UI program, assurances, and other program deficiencies identified in the annual SQSP guidance provided by the Department. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

First Payment Promptness

Performance Measures	ALP	CAP Based on SQSP 2019 Perf Level	State's Target Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4
First Payment Promptness: % of all 1st payments within 14/21 days after the compensable week.	≥ 87%	66.17%	Target	70.0%	75.0%	80.0%	85.0%
First Payment Promptness, 14/21 days Intrastate UI full weeks	≥ 87%	65.67%	Target	70.0%	75.0%	80.0%	85.0%

Performance Measures	ALP	CAP Based on SQSP 2019 Perf Level	State's Target Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4
First Payment Promptness, 14/21 days Interstate UI full weeks	≥ 70%	68.04%	Target	70.0%	72.0%	74.0%	76.0%

Corrective Action Plan Summary:

A. The Reason for the deficiency.

During the core measure period of 4/1/2017 to 3/31/2018, Kentucky First Payment Promptness of 66.17% was below the Acceptable Level of Performance (ALP) of 87%. The intrastate First Payment Promptness of 65.67% was below the ALP of 87% and the interstate First Payment Promptness of 68.04% was below the ALP of 70%. During the majority of this review period, Kentucky had an employer protest period of fifteen days which had an adverse impact on First Payment Promptness. Kentucky reduced the employer protest period from fifteen days to ten days if the employer submits the protest by paper or twelve days if filed electronically. This change was made effective December 1, 2017, by regulation 787 KAR 1:070, and should have a positive impact on First Payment Promptness.

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

Kentucky continues to monitor and enforce the regulatory requirements of 787 KAR 1:070 to ensure employer protests are received timely. This will reduce the time it takes to complete an investigation, resolve issues, and make first payments.

Kentucky is reviewing all correspondence and questionnaires shared with our customers for readability, understandability, and efficacy. Revisions are ongoing to ensure all communications are targeted and written with Kentucky's Unemployment Insurance customers/audience in mind. Moreover, all interactive questionnaires are being revised to ensure that the questions posed are concise and tailored to efficiently glean all pertinent information necessary to make a well-reasoned determination in a timely manner, meet Federal timeliness and quality standards, and make prompt first payments.

Kentucky has developed an internal tool (interactive elements manual) that is a spreadsheet based questionnaire utilizing decision tree technology. This tool will be available to all adjudicators. The interactive elements manual will assist the adjudicator in performing an effective investigation by following the most efficient questioning convention and will also internally track the efficacy of the interview vis-à-vis Benefits Timeliness and Quality criteria.

Kentucky is currently utilizing the Equifax Portal to retrieve relevant and material information, decrease the time it takes to complete an investigation, and improve First Payment timeliness. Kentucky has conducted User Acceptance Training (UAT) on Liquid Office, a web-based solution for creating, routing and managing electronic forms. The interactive nature of this software will reduce the time it takes to request and receive critical information and documentation from claimants and make first payments.

Kentucky is automating the issue assignment process with an internal Seibel based program (Assignment Manager). This will optimize the issue assignment process, emancipate resources, and improve Non-Monetary timeliness. Assignment manager is in the development stage and will proceed as resources permit. This will reduce the time necessary to make accurate and timely first payments.

Kentucky is leveraging technology to address training needs. Specifically, Kentucky's interactive training modules initiative. These modules are designed to address specific issues, processes, and procedures in an interactive format including tests designed to gauge information retention, understanding and practical applications. The initiative is a comprehensive and holistic approach to disseminating critical program information. Kentucky currently has six training modules vetted and ready for distribution. These modules will increase the adjudicators' skillsets and issue awareness and thereby decrease the time it takes to identify and resolve issues and make accurate and timely first payments.

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.

The plan in place for 2018 did indeed produce positive results resulting in slightly higher performance results in 2018. This is reflective of the change in regulation 787 KAR 1:070, in December 2017, to reduce the employer protest period. However, the change in the regulation was late in the assessment period and the full effects and residual benefits of said change were not fully realized in the 2018 review period. Kentucky will continue to benefit from the residual effects of the reduction in the employer protest period as well as improved training techniques.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

Kentucky continues to monitor and assess the efficacy of the efforts to improve First Payment Promptness. The monitoring is performed on a weekly, monthly, and quarterly basis through internal reports.

Milestones

1. Improve adjudicator efficiency through intensive training techniques including static interactive training modules and testing.

Completion Date: Multi-year

2. Leverage technology to decrease the time it takes to assign an issue and complete the investigation. Automate the assignment of issues through a Seibel based program (Assignment Manager).

Completion Date: Multi-year

3. Leverage technology to decrease the time it takes to request and receive critical information from claimant. Implement Liquid Office, a web-based solution for creating, routing and managing electronic forms to enhance communications with the claimants.

Completion Date: 03/31/2019

4. Leverage technology to improve the timeliness and quality of investigations through the implementation of an internal tool (interactive elements manual) that is a spreadsheet based questionnaire utilizing decision tree technology.

Completion Date: 12/31/2018

5. Utilize existing third party administrator technology, Equifax Portal, to expedite critical information requests and responses from employers and their third party administrators/agents.

Completion Date: 12/31/2018

Nonmonetary Determination Timeliness

Performance Measure	ALP	CAP Based on SQSP 2019 Performance	State's Target Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4
Nonmonetary Determination Timeliness	≥ 80%	59.09%	Target	70.0%	75.0%	80.0%	85.0%

Corrective Action Plan Summary:

A. The Reason for the deficiency.

During the core measure period of 4/1/2017 to 3/31/2018, Kentucky Non-Monetary Timeliness was 79.9%. This is .01% below the Acceptable Level of Performance (ALP) of 80%. During the majority of this review period, Kentucky had an employer protest period of fifteen days which had an adverse impact on Non-monetary Timeliness. Kentucky reduced the employer protest period from fifteen days to ten days if the employer submits the protest by paper or twelve days if filed electronically. This change was made effective December 1, 2017, by regulation 787 KAR 1:070, and will have a positive impact on Non-monetary Timeliness.

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

Kentucky continues to monitor and enforce the regulatory requirements of 787 KAR 1:070 to ensure employer protests are received timely. This will reduce the time it takes to complete an investigation and resolve issues.

Kentucky is reviewing all correspondence and questionnaires shared with our customers for readability, understandability, and efficacy. Revisions are ongoing to ensure all communications are targeted and written with Kentucky's Unemployment Insurance customers/audience in mind. Moreover, all interactive questionnaires are being revised to ensure that the questions posed are concise and tailored to efficiently glean all pertinent information necessary to make a well-reasoned determination in a timely manner and meet Federal timeliness and quality standards.

Kentucky has developed an internal tool (interactive elements manual) that is a spreadsheet based questionnaire utilizing decision tree technology. This tool will be available to all adjudicators. The interactive elements manual will assist the adjudicator in performing an effective investigation by following the most efficient questioning convention and will also internally track the efficacy of the interview vis-à-vis Benefits Timeliness and Quality criteria.

Kentucky is currently utilizing the Equifax Portal to retrieve relevant and material information, decrease the time it takes to complete an investigation, and improve First Payment timeliness.

Kentucky has conducted User Acceptance Training (UAT) on Liquid Office, a web-based solution for creating, routing and managing electronic forms. The interactive nature of this software will reduce the time it takes to request and receive critical information and documentation from claimants.

Kentucky is automating the issue assignment process with an internal Seibel based program (Assignment Manager). This will optimize the issue assignment process, emancipate resources, and improve Non-Monetary timeliness. Assignment manager is in the development stage and will proceed as resources permit.

Kentucky is leveraging technology to address training needs. Specifically, Kentucky's interactive training modules initiative. These modules are designed to address specific issues, processes, and procedures in an interactive format including tests designed to gauge information retention, understanding and practical applications. The initiative is a comprehensive and holistic approach to disseminating critical program information. Kentucky currently has six training modules vetted and ready for distribution. These modules will increase the adjudicators' skillsets and issue awareness and thereby decrease the time it takes to identify and resolve issues.

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.

The plan in place for 2018 did produce positive results. Indeed, the change in regulation 787 KAR 1:070 in addition to intensive training has resulted in an increase of .09% in Non-monetary Timeliness. Kentucky will continue to benefit from the residual effects of the reduction in the employer protest period through regulation change in 787 KAR 1:070 as well as improved training techniques.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

Kentucky continues to monitor and assess the efficacy of the efforts to improve Non-monetary Timeliness results. The monitoring is performed on a weekly, monthly, and quarterly basis through internal reports.

Milestones

1. Improve adjudicator efficiency through intensive training techniques including static interactive training modules and testing.

Completion Date: Multi-year

2. Leverage technology to decrease the time it takes to assign an issue and complete the investigation. Automate the assignment of issues through a Seibel based program (Assignment Manager).

Completion Date: Multi-year

3. Leverage technology to decrease the time it takes to request and receive critical information from claimant. Implement Liquid Office, a web-based solution for creating, routing and managing electronic forms to enhance communications with the claimants. Completion Date: 03/31/19

4. Leverage technology to improve the timeliness and quality of investigations through the implementation of an internal tool (interactive elements manual) that is a spreadsheet based questionnaire utilizing decision tree technology. Completion Date: 12/31/2018

5. Utilize existing third party administrator technology, Equifax Portal, to expedite critical information requests and responses from employers and their third party administrators/agents. Completion Date: 12/31/2018

Effective Audit Measure (EAM) - Score \geq 7; exceed all 4 factors

Performance Measure	ALP	CAP Based on SQSP 2019 Performance	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4
EAM - Factor 1 (Contributory Employers Audited)	Score ≥ 1		Target				
EAM - Factor 2 (Change in Total Wages from Audits)	Score ≥ 2		Target				
EAM - Factor 3 (Total Wages Audited)	Score ≥ 1		Target	1.2	0.3	0.6	0.9
EAM - Factor 4 (Avg of Misclassified Workers Detected per Audit)	Score ≥ 1		Target				
Effective Audit Measure Total Score	Score ≥ 7		Target				

Corrective Action Plan Summary:

A. The Reason for the deficiency.

"While Kentucky's efforts fully met the requirements factor 1, 2, and 4, including the required additional two points for state directed emphasis, we missed the goal of factor 3 by the slim margin of one hundred seventy-five thousandths (0.175%) by not completing the one percent audit of the sixty-four billion dollars (\$64,000,000,000) identified as the total wages of contributory employers as of September 30th of the previous year. This occurred as the result of multiple reasons. First, a loss of auditor personnel conducting audits, and secondly, a miscalculation of strategy. Individual auditors were required to conduct a greater number of audits than the previous year, however the overall number of audits conducted was fifty (50) less than the previous year. In a focused effort to identify the maximum number of misclassified workers, too much emphasis was placed on employers who were reporting fewer wages. In the process, the random selection of audits yielded unsatisfactory results for the effective audit measure in question, factor 3.

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

Upon seeing that our agency had failed to meet Factor 3, by auditing 1% of the states total contributory wages, a team of local UI Tax Audit experts was assimilated for the purpose of data analysis and for generating ideas to address the failure. The team brainstormed possible approaches and developed a plan that would assist in the achievement of our goals. Four milestones, along with completion dates, were established that guided the work. The team began evaluation of all audit data, on a month by month basis, generating hard data from which audit assignments are being made. The date each month's data would be assimilated and reviewed was also to be documented within the Corrective Action Plan (CAP).

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

The team of Tax Audit Branch experts will review all annual data, including the total of contributory employers and the state's total contributory wages. Utilizing all this information, the team will develop the plan for subsequent audit years, making adjustments as necessary in an attempt to assure that all four DOL factors are satisfactorily achieved.

Milestones

1. The Tax Audit Branch will assimilate a team of UI Tax Audit experts, from the local level, to evaluate strategy and to develop a plan for immediate intervention. Completion Date: 12/31/2018

2. The Tax Audit Branch will adjust the floor of the parameters used to identify a random pool of Large Audits from a minimum of \$1,000,000 to \$3,000,000.

Completion Date: 12/31/2018

3. The Tax Audit Branch will meet with Tax Audit Branch tech support to redefine the data retrieval query to the new standard with a \$3,000,000 floor for Large Audits. This action will result in a pool of larger random audits from which audit assignments may be generated.

Completion Date: 12/31/2018

4. The Tax Audit Branch will populate our Excel Spreadsheet tool that displays current progress, in real time, on a monthly basis, for all four effective audit measurement factors, upon the completion of audits for each month. This action will assist staff in understanding the real time (monthly) progress being made toward achieving our goals. Completion Date: 12/31/2019

Improper Payments Measure

Performance Measure	ALP	CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4
Improper Payments Measure	< 10%	20.38%	Target	20.00%	19.00%	18.00%	17.00%

Corrective Action Plan Summary:

The Summary must provide:

A. The Reason for the deficiency.

"During the review period of 1/1/2017 to 12/31/2017, improper payments were Employment Service (ES) registration 75.5%, separation issues 9.16% and benefit year earnings (BYE) 6.34%.

The majority of improper payment deficiencies were attributable to the inefficiencies in the ES Registration process. The ES Registration process during this period was facilitated through two

independent systems. These systems were not integrated and lacked the capacity for sharing information. Moreover, the registration process required a separate set of credentials to access each system. A deactivation of the ES accounts lead to the inability of returning claimants to access their accounts and register in a timely manner.

The separation issues were attributable in larger part due to improper benefit payments being made because the employer, or an agent of the employer, was at fault for failing to respond timely or adequately to the request of the secretary for information relating to a claim for benefits. In addition, separation instructions given by the employer were not clear and ambiguous.

Additionally, the lack of effective audits to timely identify unreported and underreported earnings have resulted in BYE deficiencies.

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

"In order to achieve better results, Kentucky is looking at addressing the root causes of improper payments: Employment Service (ES) registration, separation issues and benefit year earnings. 75% of Kentucky's improper payments are attributed to ES Registration. Kentucky has embeded the ES Registration process into the UI claim filing process in December 2017. In addition, information provided to claimants during the benefit rights interview was updated in March 2018 to clarify instructions during the claim filing and ES Registration process. This has addressed both ES Registration and separation issues.

To address benefit year earnings, Kentucky will work with the Commonwealth Office of Technology (COT) to develop targeted audits to look for wages in quarters that benefits were paid. In addition, Kentucky will utilize its authority to penalize employers for untimely / inadequate responses to cross match audits. An electronic wage audit notice response will be added to kcc.ky.gov website.

"

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.

Kentucky centralized operations during the review period. The process for ES Registration has been updated and embedded into the claim filing process to ensure registration is completed prior to first payments. In addition, Kentucky is working to develop targeted audits to look for wages in quarters that benefits were paid to address BYEs.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

Review BAM Improper Payments quarterly to determine top three root causes and if our milestones are effective. Review targeted audits to determine effectiveness in BYE findings.

Milestones

1. Update the unemployment insurance rights and responsibility pamphlet for claimants and clarify instructions to the claimant during the claim filing and ES Registration process. Completion Date : 12/31/2018

2. BAM Investigators to use House Bill 102 for employers when writing determinations. Completion Date : 12/31/2018

3. Work with Commonwealth Office of Technology (COT) to develop targeted audits to look for wages in quarters that benefits were paid.

Completion Date : 03/31/2019

4. Utilize Kentucky's authority to penalize employers for untimely / inadequate responses to cross match audits. Completion Date : 03/31/2019

5. Add electronic wage audit notice response to kcc.ky.gov website. Completion Date : 06/30/2019

6. Review BAM improper payments quarterly to determine if changes that were implemented March 2018 for ES registration are effective.

Completion Date : 12/31/2019

Data Validation Benefits

Performance Measure	ALP	CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4
Data Validation Benefits - All Submitted and Passing	Submitted & Passing	Population 1	Target	PASS	PASS	PASS	PASS
.	.	Population 2	Target	PASS	PASS	PASS	PASS
.	.	Population 3	Target	FAIL	PASS	PASS	PASS
.	.	Population 3a	Target	FAIL	PASS	PASS	PASS
.	.	Population 4	Target	PASS	PASS	PASS	PASS
.	.	Population 5	Target	PASS	PASS	PASS	PASS
.	.	Population 6	Target	PASS	PASS	PASS	PASS
.	.	Population 7	Target	PASS	PASS	PASS	PASS
.	.	Population 8	Target	PASS	PASS	PASS	PASS
.	.	Population 9	Target	PASS	PASS	PASS	PASS
.	.	Population 10	Target	PASS	PASS	PASS	PASS
.	.	Population 11	Target	PASS	PASS	PASS	PASS

Performance Measure	ALP	CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4
.		Population 12	Target	NS	PASS	PASS	PASS
.	.	Population 13	Target	NS	PASS	PASS	PASS
.		Population 14	Target	NS	FAIL	PASS	PASS
.	.	Population 15	Target	NS	PASS	PASS	PASS
.		Mod 3 Benefits	Target	NS	NS	PASS	PASS
.	.	Mod 4 Seps	Target	NS	NS	PASS	PASS
.		Mod 4 Nonseps	Target	NS	NS	PASS	PASS
.	.	Mod 4 Appeals	Target	NS	NS	PASS	PASS

Corrective Action Plan Summary:

A. The Reason for the deficiency.

During the Data Validation 2017 validation year, Kentucky's Quality Control Branch unexpectedly lost their institutional knowledge of Data Validation. Kentucky was able to send a person to Data Validation training in the last quarter of the validation year that provided additional tool sets that could only be found in Data Validation training. Data Validation populations were submitted prior to end of the validation year, however all failed report validation. Data Validation is competing for priorities on a limited mainframe resource.

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

Kentucky has disseminated training to expand Data Validation efforts within the Quality Control Branch. Kentucky will create a timeline/work plan to complete each population and chart the progress. Progress reports will be discussed with management monthly to ensure data validation is completed timely. Data Validation personnel will partner with the Commonwealth Office of Technology (COT) to obtain extract files corrected as needed.

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.

During the previous year, Kentucky loaded Benefits Population 3 several times, failing report validation each time but not without results; reporting problems were found in the ETA 5159. Kentucky corrected the reporting problems, but still produced failing results with Population 3. Kentucky unexpectedly lost the institutional knowledge of Data Validation. Receiving training during the last quarter of the validation year has provided a foundation to re-establish Data Validation knowledge in Kentucky.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

A timeline for populations will be created and tracked in the Quality Control Branch. Monthly meetings with Data Validation team to discuss Data Validation will address issues as they arise. Progress reports will be kept for each population to include numbers of times loaded, extract file errors to be fixed, reporting issues, and other items of concern.

Milestones

1. Begin process of training additional employee currently on staff to assist with Benefits Data Validation processes. Completion Date: 12/31/2019

2. Monthly meetings with Data Validation team to discuss progress and future populations. Completion Date: Multi-year

3. Population 6-11 submitted during the second quarter of the data validation period. If populations do not pass report validation, determine root causes and repeat the steps. Completion Date: 12/31/2018

4. Population 1-5 submitted during third quarter of the data validation period. If populations do not pass report validation, determine root causes and repeat the steps. Completion Date: 12/31/2018

5. Population 12-15 submitted during fourth quarter of the data validation period. If populations do not pass report validation, determine root causes and repeat the steps. Completion Date: 3/30/2019

6. Benefits Module 4 submitted during fourth quarter of the data validation period. If populations do not pass report validation, determine root causes and repeat the steps. Completion Date: 6/30/2019

Data Validation Tax

Performance Measure	ALP	CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4
Data Validation Tax - All Submitted and Passing	Submitted & Passing	Population 1	Target	PASS	PASS	PASS	PASS
.	.	Population 2	Target	PASS	PASS	PASS	PASS
.	.	Population 3	Target	FAIL	PASS	PASS	PASS
.	.	Population 4	Target	FAIL	PASS	PASS	PASS
.	.	Population 5	Target	FAIL	PASS	PASS	PASS

Performance Measure	ALP	CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4
.	.	Mod 3 Tax	Target	NS	PASS	PASS	PASS
.	.	Mod 4 Status New	Target	NS	PASS	PASS	PASS
.	.	Mod 4 Successor	Target	NS	PASS	PASS	PASS
.	.	Mod 4 Terminate	Target	NS	PASS	PASS	PASS
.	.	Mod 4 Field Audit	Target	NS	PASS	PASS	PASS
.	.	Mod 5 Wage Item	Target	NS	PASS	PASS	PASS

Corrective Action Plan Summary:

A. The Reason for the deficiency.

During the Data Validation 2017 validation year, Kentucky's Quality Control Branch unexpectedly lost their institutional knowledge of Data Validation. Kentucky was able to send a person to Data Validation training in the last quarter of the validation year that provided additional tool sets that could only be found in Data Validation training. Data Validation populations were submitted prior to end of the validation year, however all failed report validation. Data Validation is competing for priorities on a limited mainframe resource.

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

Kentucky has disseminated training to expand Data Validation efforts within the Quality Control Branch. Kentucky will create a timeline/work plan to complete each population and chart the progress. Progress reports will be discussed with management monthly to ensure data validation is completed timely. Data Validation personnel will partner with the Commonwealth Office of Technology (COT) to obtain extract files corrected as needed.

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.

During the previous year, Kentucky loaded Benefits Population 3 several times, failing report validation each time but not without results; reporting problems were found in the ETA 5159. Kentucky corrected the reporting problems, but still produced failing results with Population 3. Kentucky unexpectedly lost the institutional knowledge of Data Validation. Receiving training during the last quarter of the validation year has provided a foundation to re-establish Data Validation knowledge in Kentucky.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

A timeline for populations will be created and tracked in the Quality Control Branch. Monthly meetings with Data Validation team to discuss Data Validation will address issues as they arise. Progress reports will be kept for each population to include numbers of times loaded, extract file errors to be fixed, reporting issues, and other items of concern.

Milestones

1. Begin process of training additional employee currently on staff to assist with Tax Data Validation processes. Completion Date: 3/31/2019

2. Monthly meetings with Data Validation team to discuss progress and future populations. Completion Date: Multi-year

3. Tax Population 1-5 submitted during third quarter of the data validation period. If populations do not pass report validation, determine root causes and repeat the steps. Completion Date: 3/31/2018

4. Tax Module 4 and Module 5 submitted during fourth quarter of the data validation period. If populations do not pass report validation, determine root causes and repeat the steps. Completion Date: 3/31/2019

Benefit Accuracy Measurement

Performance Measures	ALP	CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4
BAM Operations Compliant - 60-Day Paid Timeliness	≥ 70%	50.19%	Target	50%	60%	65%	70%
BAM Operations Compliant - 60-Day Monetary Timeliness	≥ 60%	48.10%	Target	60.00%	60.00%	70.00%	75.00%
BAM Operations Compliant - 90-Day Monetary Timeliness	≥ 85%	77.10%	Target	85.00%	87.00%	88.00%	89.00%
BAM Operations Compliant - 60-Day Nonseparation Timeliness	≥ 60%	31.28%	Target	60.00%	60.00%	70.00%	75.00%
NDNH BAM Compliance	Pass	Fail	Target	PASS	PASS	PASS	PASS

Corrective Action Plan Summary:

A. The Reason for the deficiency.

During the period that covered BAM batches 201627-201726, timeliness issues in BAM investigations have arisen due to a lack of outlined goals for the investigators. Many of the investigators perform multiple roles and their time has not been properly prioritized during this time period. Being clearly

aware of the expectations regarding investigations should bring swift improvement. The NDNH BAM hit file was found to be non-compliant due to the W-4 thru date being less than 30 days from the key week.

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

The manager of the Quality Control Branch, in conjunction with the BAM supervisor, is currently implementing checks and balances to ensure timely investigations, and providing support and training where needed. Other areas of improvement will include better communication with employers, including but not limited to: email scripts for investigators, revamping written (paper) communication with employers, etc. These modernizations, including written and established goals for case completion, should invigorate our BAM investigators and produce more timely results in the future. Weekly meetings with BAM Staff are already in place to address barriers to case completion as well as weekly goals and progress updates. Case trackers have been implemented to provide branch management an operation picture and to identify issues with case completion. Kentucky is working to create a backlog/timeliness contingency plan to address potential timeliness issues and to ensure DOL timeliness standards are met. In addition, Kentucky currently assigns 40 additional BAM cases for both paid and denied cases; this is above DOL requirements. Kentucky will reduce the number of BAM cases assigned to the required DOL standard to help address timeliness of both paid and denied cases.

Kentucky is working in partnership with the Commonwealth Office of Technology and On Point to make the necessary changes to programing to bring the NDNH hit file into compliance.

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

Weekly meetings with BAM Staff to address barriers to case completion, review weekly goals and progress reports. BAM case trackers will provide the needed operational picture to identify triggers for implementing timeliness contingency plan. Kentucky will monitor the number of cases completed to ensure DOL requirements of 480 cases is met.

Milestones

1. Update NDNH hit file to comply with DOL guidelines for the W-4 thru date. Completion Date: 12/31/2018

2. Revamp BAM Case documents to function more efficiently through better use of available technology, including mail-merge functionality and creation of a single, comprehensive BAM contact document. Completion Date: 12/31/2018

3. Create backlog contingency plan to address issues and actions to take when DOL timeliness is not being met. Completion Date: 12/31/2018

4. Create standardized scripts for email correspondence. Transition to global BAM email address for sending and receiving electronic BAM documents to improve efficiency of BAM unit by allowing cases to continue to be worked when an investigator is out of the office. Completion Date: 12/31/2018

5. Implement processes so that as documents are received they are immediately reviewed. If they are incomplete or additional information is required, this is addressed by the document reviewer at that time.

Completion Date: 12/31/2018

6. Review case trackers weekly to ensure timeliness and implement timeliness contingency plan if thresholds identified are not meet.

Completion Date: 12/31/2018

7. Review BAM procedural manual quarterly and update to ensure consistent standards are established and followed throughout the BAM unit.

Completion Date: Multi-year

Facilitate Reemployment

Performance Measure	ALP	CAP Based on SQSP 2019 Performance Level	State's Target/Actual Performance	12/31/2018 Quarter 1	3/31/2019 Quarter 2	6/30/2019 Quarter 3	9/30/2019 Quarter 4
Facilitate Reemployment	68%	56.40%	Target	56.4%	57.0%	58.0%	58.5%

Corrective Action Plan Summary:

A. The Reason for the deficiency.

Kentucky has shifted focus in the Career Centers from Unemployment Insurance assistance to Employment Services. This shift has allowed Wagner Peyser staff to focus more on providing employment services to customers in a more individualized manner rather than the focus on claimant assistance. More emphasis has been placed career coaching with special emphasis on first time payment customers and RESEA customers. Kentucky currently has an outdated RESEA profile model which has hindered our ability to identify and engage all potential customers.

B. Provide a description of your "Plan-Do-Check-Act" corrective action plan which will be undertaken to achieve the acceptable level of performance. Examples of major actions and activities; aka, Milestones, include IT requirements, business process analysis, training, implementing process improvements, measuring effectiveness, etc. Please include a description of these actions/activities in each stage of your "Plan-Do-Check-Act" corrective action plan.

Kentucky identified three key areas to focus attention: Outdated RESEA Model, Ineffective Orientation Meetings, and Insufficient Career Coaching and Case Management, the work continues to revamp these areas.

Outdated RESEA Model. We will revise outdated profiling model by including more customers in excluded zip codes. We will create and review reports that will detail the impact of the increased number of customers. Once an acceptable model has been determined, we will roll out the revised RESEA model.

Ineffective Orientation Meetings. The revised curriculum will place more focus on comprehensive IEPs, individualized Career Counseling and in-depth job searching techniques. Kentucky will review the revised processes and curriculum to ensure the enhanced revisions will have a positive impact on our customers. Once the process and curriculum selected and standardized, Kentucky will implement the revised curriculum across all regions.

Insufficient Career Coaching and Case Management. We will develop curriculum that enhances employment services to the first time payments and RESEA customers. These customers are a result of listings that are pulled weekly to identify potential reemployment customers most in need of services. Kentucky will create and review reports that detail the number increase from the enhanced services provided to customers. Moreover, we will implement the revised case management curriculum.

C. If a plan was in place the previous year, an explanation of why the actions contained in that plan were not successful in improving performance; and, an explanation of why the actions now specified will be more successful.

Due to limited resources of staffing and having a new comprehensive case management system deploying in October 2018, revamping the curriculum and process were not as high of a priority as those mentioned. However, as we look towards October, we should have the time to implement the milestones.

D. A brief description of plans for monitoring and assessing accomplishment of planned actions and for controlling quality after achieving performance goals.

Kentucky will institute a plan to improve reemployment services provided in all 12 Kentucky Career Center hubs. All customers will be provided a Welcome, Orientation, and Assessment (WOA). The WOA will include an introduction to all services provided in the Career Center, a brief assessment and follow-up every 2 weeks to assure that all customers have the best opportunity to become employed. Managers will check on progress of staff to ensure completion of follow-up. The Regional Managers will be extracting three listings of customers, first time payments and RESEA, which will allow them to track and result out of the employment of each customer on a weekly basis.

Milestones

1. Revise the RESEA model.

Completion Date : 06/30/2019

2. Update the curriculum for Orientation Meetings and implement with Wagner Peyser staff in the local Kentucky Career Center locations.

Completion Date: 03/31/2019

3. Revise curriculum used by Wagner Peyser personnel for case management and career coaching in the local Kentucky Career Centers. Implement changes across the Commonwealth of Kentucky in all Kentucky Career Center locations that provide employment services. Completion Date: 12/31/2019

5. UI PROGRAM INTEGRITY ACTION PLAN (UI IAP)

The UI IAP outlines the strategies the State will undertake during the planning period regarding the prevention reduction and recovery of UI improper payments.

UI Integrity Action Plan (IAP)

State: Kentucky

Federal Fiscal Year: 2019

Accountable Agency Official(s): Beverly Hillenmeyer

Top Three Root Causes	(CY 2017)	CY 2016 (%) of \$ Overpaid)	CY 2017 (%) of \$ Overpaid)
Root Cause 1:	ES Registration	55.95%	74.22%
Root Cause 2:	Separation Issues	5.06%	11.42%
Root Cause 3:	Benefit Year Earnings	18.12%	5.65%

Summary: (Provide a summary of the plan that the state has designed. The summary should include outreach efforts planned by the agency to inform all UI and workforce staff, and employers of the strategic plan to ensure everyone understands the importance of maintaining program integrity.)

Employment Services (ES) Registration, Separation issues, and BYE were the three highest causes of overpayments in 2017. The strategies and actions below were selected to address the root causes and prevent further overpayments in each of these areas. The improper payment rate from January 1, 2017 to December 31, 2017, for Kentucky was 20.38%, 10.38% above the ALP of 10%. For prevention of improper UI payments the State Information Data Exchange System (SIDES) has been implemented to provide more robust and reliable data exchange with employers and third party administrators. Kentucky will update information provided to claimants during the benefit rights interview to clarify instructions during the claim filing and ES Registration process. This will address both ES Registration and separation issues. For detection of improper UI payments the State of Kentucky uses the National Directory of New Hires (NDNH) which allows for improved access to wage data and data from other states regarding new hires and wages.

Kentucky will work with the Commonwealth Office of Technology (COT) to develop targeted audits to look for wages in quarters that benefits were paid. In addition, Kentucky will utilize its authority to penalize employers for untimely / inadequate responses to cross match audits. An electronic wage audit notice response will be added to kcc.ky.gov website. Currently, Benefit Audit, Reporting and Tracking System (BARTS), implemented in 2006, is utilized for all fraud tip processing. The result is more timely and efficient fraud investigations. Kentucky has further expanded the BARTS system by incorporating an Internet Response Module for Employers (IRME). IRME provides employers the opportunity to receive and respond to the numerous quarterly Wage Audit Notices (WAN) they receive in the mail electronically via Internet. Non-compliant (bi-weekly, monthly, etc. wages from employer) can be automatically prorated into compliant (Saturday week end date used by KY UI system) format for review and validation by the employer.

Methods of overpayment recovery used are: Recover program, monthly partial payment agreements with claimants, offset of benefits, state and federal revenue intercept, liens, civil suits, wage garnishment, and court recovered funds resulting from fraud prosecution. For recovery of improper UI payments the State of Kentucky has implemented Treasury Offset Program (TOP) — Implementation of the U.S. Department of the Treasury's TOP to recover certain unemployment debts from Federal income tax refunds. Kentucky actively promotes the integrity efforts of the Division by hosting employer training seminars. An important topic covered is the legislation that imposes penalties on claimants and employers for failing to respond timely. Efforts are ongoing to promote the utilization of our online work refusal and fraud tip forms. The messaging efforts planned by the state to inform all UI and workforce staff of the state's integrity plan is focus messaging through emails,

placing the plan on the state of Kentucky's UI website career side for claimants, using social media to include; Facebook, Twitter, and YouTube, and press releases of the integrity plan. The outreach efforts to employers to inform them of the integrity initiative include placing the plan on the state of Kentucky's UI website in the employer section, using social media to include; Facebook, Twitter, and YouTube, press release of integrity plan, and including plan in quarterly bills to employers. The BAM sample for improper payments will be reviewed quarterly to determine root causes and ensure correctness.

Root Cause 1: ES Registration

Strategies	Actions	Targets & Milestones	Resources
1.Update information provided to claimant	Update the unemployment insurance rights and responsibility pamphlet for claimants and clarify instructions to the claimant during the claim filing and ES registration process.	12/31/2018	Focus Career, KEWES, Kentucky Career Centers
2. Integrate ES Registration and UI claim process	Kentucky will embed the ES Registration process into the UI claim filing process.	12/31/2018	KEWES

Root Cause 2: Separation Issues

Strategies	Actions	Targets & Milestones	Resources
1. Clarify instructions during UI claim process	Clarify instructions to the claimant during the claim filing process to ensure separation reason is correct during the claim filing process.	12/31/2018	KEWES
2. Educate claimant	Update the unemployment insurance rights and responsibility pamphlet for claimants to educate claimants based on unclear/ambiguous information provided by the employer, e.g. "it's not working out."	12/31/2018	KEWES, UI-400 UI Rights and Responsibilities Pamphlet
3. Penalize untimely responses	Penalize employers for failing to respond timely or adequately to the request of the secretary for information relating to a claim for benefits.	03/31/2019	HB102, KEWES
Additional:			
Review BAM Improper Payments	Review sample from BAM Improper Payments quarterly to address actions reflected in IAP are effective.	Quarterly Review	SUN, PuTTY, KEWES

Root Cause 1: Benefit Year Earnings

Strategies	Actions	Targets and Milestones	Resources
1 Targeted audits	Kentucky will work with the Commonwealth Office of Technology (COT) to develop targeted audits to look for wages in quarters that benefits were paid.	12/31/2019	KEWES, BARTS,
2 Penalize untimely responses	Kentucky will utilize its authority to penalize employers for untimely / inadequate responses to cross match audits.	03/31/2019	HB 102, KEWES, BARTS
3 Ease of response	An electronic wage audit notice response will be added to kcc.ky.gov website.	12/31/2018	Kcc.ky.gov, BARTS

6. ORGANIZATIONAL CHART

The organization chart must conform to the requirement for delivery of service through public employment offices, or such other designated providers as the Secretary may authorize; show the State's configuration from the Governor of the State down to the point of Employment Service and UI customer service delivery; and provide sufficient detail to show each organizational unit involved and the title of the unit manager.

Office of Employment and Training

Executive Director: John Pallasch

Kentucky Unemployment Insurance Commission: Brad Montell, Chair

Kentucky Unemployment Insurance Commission Greg Higgins, Manager

Systems Helpdesk Branch: Ron Winfield

Workforce & Employment Services Division

Workforce & Employment Services Division Director: Rick Schad, Director

Workforce & Employment Services Division Assistant Director: Rachel Adams

Individual Customer Services Branch: Vacant

Employer Customer Services Branch Michelle DeJohn, Manager

Regional Managers :

OET Offices: Local Workforce Development Area

Unemployment Insurance Division

Unemployment Insurance Division Director: Katie Houghlin

Benefits & Adjudication Assistant Director: Jeff Paige, Acting

Tax and Audit Assistant Director : Andy Hudgins

Tax Audit Branch: Gary Upchurch, Manager

Tax Enforcement Branch: Beverly Dearborn, Manager

Adjudication Branch: Karen Pursiful, Manager

Benefits Branch: Becky Akin, Manager

Integrity Branch: Beverly Hillenmeyer, Manager

Quality Control Branch: Brian Gustafson, Manager

Appeals Support Branch: Don Schierer, Acting Manager

Appeal Hearing Branch: Jeff Paige, Manager

7. SQSP SIGNATURE PAGE

The State administrator must sign and date the SQSP Signature Page. By signing the Signature Page, the State administrator certifies that the State will comply with all the assurances and activities contained in the SQSP guidelines.

U.S. Department of Labor SQSP SIGNATURE PAGE

OMB Approval No. 1205-0132 Expires 02/28/2021

***U.S. DEPARTMENT OF LABOR Employment and Training Administration FEDERAL FISCAL YEAR: 2019
STATE: KY***

UNEMPLOYMENT INSURANCE STATE QUALITY SERVICE PLAN SIGNATURE PAGE

This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration, and

_____Kentucky Department of Workforce Investment_____

(NAME OF STATE AGENCY)

The Unemployment Insurance SQSP is part of the State's overall operating plan and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by the DOL, and adhere to the Federal requirements related to the use of granted funds.

All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SQSP Handbook and will be subject to its terms.

PRINTED NAME AND TITLE SIGNATURE DATE

STATE ADMINISTRATOR DATE

Jeff J. Paige, UI Assistant Director 08-22-18

DOL APPROVING OFFICIAL

DOL APPROVING OFFICIAL

The signed copy of the Signature Page is maintained with the State Agency and the Regional Office.

B. REQUIREMENTS FOR STATES ELECTING TO INCLUDE UI IN THE COMBINED STATE PLAN

States that elect to include UI in the Combined State Plan must:

1. SUBMIT AN SQSP IN THE FOLLOWING MANNER DEPENDING ON THEIR TIMING IN THE SQSP CYCLE:

A. IF A STATE IS IN THE FIRST YEAR OF THEIR 2-YEAR CYCLE, A COMPLETE SQSP PACKAGE MUST BE SUBMITTED. A COMPLETE SQSP PACKAGE WILL INCLUDE THE TRANSMITTAL LETTER, BUDGET WORKSHEETS/FORMS, STATE PLAN NARRATIVE, CAPS (INCLUDING THE MILESTONES AND THE COMPLETION DATE FOR EACH MILESTONE), THE UI IAP, ORGANIZATIONAL CHART, AND THE SQSP SIGNATURE PAGE. ONE OF THE KEY GOALS FOR THE UI PROGRAM IS TO ENSURE THAT CLAIMANTS ARE ABLE TO SUCCESSFULLY RETURN TO WORK. AS SUCH, THE SQSP STATE PLAN NARRATIVE MUST PROVIDE A DISCUSSION OF THE PLAN COORDINATION WITH OTHER WIOA COMBINED PLAN PROGRAMS TO ENSURE A COORDINATED EFFORT AND INTEGRATED SERVICE DELIVERY.

A signed copy the Transmittal letter is maintained with the State Agency and the Regional Office. The title: Application for Federal Assistance SF-424. Description: Unemployment Insurance Administration. Funding total: \$27,336,555. Project start: 10/01/2017. Project end date: 9/30/2018. Name of authorizing representative; John Pallasch. The signed copy of the SF 424 and other appropriate budget-related forms are maintained with the State Agency and the Regional Office. The Organization Chart is maintained with the State Agency and the Regional Office. The signed copy of the SQSP Signature Page is maintained with the State Agency and the Regional Office.

B. IF A STATE IS IN THE SECOND YEAR OF THE 2-YEAR CYCLE, THE STATE IS REQUIRED TO SUBMIT THE MOST RECENTLY APPROVED COMPLETE SQSP PACKAGE WITH A MODIFICATION THAT MUST INCLUDE THE TRANSMITTAL LETTER, BUDGET WORKSHEETS/FORMS, ORGANIZATIONAL CHART, AND THE SQSP SIGNATURE PAGE. THE MODIFICATION MAY ALSO INCLUDE CAPS FOR NEW IDENTIFIED PERFORMANCE DEFICIENCIES, AND ANY REQUIRED MODIFICATIONS TO EXISTING CAPS. THE CAP MUST LIST BOTH SPECIFIC MILESTONES FOR KEY CORRECTIVE ACTIONS OR IMPROVEMENT ACTIVITIES, AND THE COMPLETION DATE FOR EACH MILESTONE.

2. SUBMIT THE REQUIRED OFF-YEAR SQSP COMPONENTS AS A MODIFICATION TO THE COMBINED STATE PLAN ON THE SAME CYCLE AS THE REGULAR SQSP PROCESS WHICH MUST BE APPROVED BY SEPTEMBER 30TH EACH YEAR.

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 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	67.00	71.00	70.00	72.00
Dislocated Workers	75.00	76.00	78.00	78.00
Youth	71.00	71.00	74.00	74.00
Adult Education	Baseline	0.00	Baseline	0.00
Wagner-Peyser	67.00	67.00	70.00	70.00
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
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Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	71.50	71.50	73.00	73.00
Dislocated Workers	77.00	77.00	80.00	80.00
Youth	72.00	72.00	75.00	75.00
Adult Education	0.00	0.00	0.00	0.00
Wagner-Peyser	71.50	71.50	73.00	73.00
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	5,700.00	5,700.00	6,000.00	6,000.00
Dislocated Workers	7,100.00	7,100.00	7,400.00	7,400.00
Youth	0.00	0.00	0.00	0.00

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adult Education	0.00	0.00	0.00	0.00
Wagner-Peyser	5,700.00	5,700.00	6,000.00	6,000.00
Vocational Rehabilitation	0.00	0.00	0.00	0.00

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	50.00	55.00	55.00	58.00
Dislocated Workers	50.00	58.90	55.00	61.90
Youth	50.00	71.00	55.00	74.00
Adult Education	0.00	Baseline	0.00	Baseline
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	0.00	Baseline	0.00	Baseline
Dislocated Workers	0.00	Baseline	0.00	Baseline
Youth	0.00	Baseline	0.00	Baseline
Adult Education	56.00	56.00	57.00	57.00
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 5

KYAE completed 8-25-2016 Blank areas = Baseline

KY Skills 2018-19 56.00 negotiated

KY Skills 2019-20 57.00 negotiated

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)	0.00	Baseline	0.00	Baseline

Measure	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Line 2	0.00	Baseline	0.00	Baseline
Line 3	0.00	Baseline	0.00	Baseline
Line 4	0.00	Baseline	0.00	Baseline
Line 5	0.00	Baseline	0.00	Baseline
Line 6	Baseline	Baseline	Baseline	Baseline

User remarks on Table 6

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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

