

KENTUCKY PYS 2020-2023

# CONTENTS

Kentucky PYs 2020-2023.....	1
Overview.....	3
Options for Submitting a State Plan.....	3
How State Plan Requirements Are Organized.....	4
I. WIOA State Plan Type and Executive Summary.....	5
a. WIOA State Plan Type.....	5
Combined Plan Partner Program(s).....	6
b. Plan Introduction or Executive Summary.....	7
II. Strategic Elements.....	8
a. Economic, Workforce, and Workforce Development Activities Analysis.....	8
b. State Strategic Vision and Goals.....	31
c. State Strategy.....	34
III. Operational Planning Elements.....	39
a. State Strategy Implementation.....	39
b. State Operating Systems and Policies.....	49
IV. Coordination with State Plan Programs.....	74
V. Common Assurances (For All Core Programs).....	76
VI. Program-Specific Requirements for Core Programs.....	77
Program-specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B.....	77
Program-Specific Requirements for Wagner-Peyser Program (Employment Services).....	108
Program-specific Requirements for Adult Education and Family Literacy Act Programs....	122
Program-Specific Requirements for Vocational Rehabilitation (Combined or General).....	151
VII. Program-Specific Requirements for Combined State Plan Partner Programs.....	261
Performance Indicator Appendix.....	261
All WIOA Core Programs.....	261
Additional Indicators of Performance.....	262
Other Appendices.....	262

## 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), and
- the Wagner-Peyser Act Employment Service program (authorized under the Wagner-Peyser Act, as amended by title III),
- the Vocational Rehabilitation program (authorized under 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 State 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-IV 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, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (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 (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.)) <sup>1</sup>
- Reintegration of Ex-Offenders program (programs authorized under section 212 of the Second Chance Act of 2007 (42 U.S.C. 17532))

[1] 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 out by the Department of Housing and Urban Development 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,
  - 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 Innovation and Opportunity 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.<sup>2</sup> States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations.

**Paperwork Reduction Act:** The Paperwork Reduction Act of 1995 (PRA) provides that an agency may not conduct, and no person is required to respond to, a collection of information unless it displays a valid OMB control number. Public reporting burden for this information collection is estimated to be 86 hours per state; including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Responding to this collection is required to obtain or retain the Federal grant benefit. In addition, responses to this information collection are public, and the agencies offer no assurances of confidentiality. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Labor, Office of Workforce Investment, and reference OMB control number 1205-0522. Note: Please do not return the completed plan to this address.

[2] 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 AND EXECUTIVE SUMMARY

### A. 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 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, Dislocated Worker, Youth, Wagner-Peyser Act, Adult Education and Family Literacy Act, and Vocational Rehabilitation programs.

**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.

This is a unified plan

### COMBINED PLAN PARTNER PROGRAM(S)

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

Career and technical education programs authorized under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (20 U.S.C. 2301 et seq.)

No

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

No

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

No

Work programs authorized under section 6(o) of the Food and Nutrition Act of 2008 (7 U.S.C. 2015(o))

No

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

No

Jobs for Veterans State Grants Program (programs authorized under 38, U.S.C. 4100 et. seq.)

No

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

No

Senior Community Service Employment program (programs authorized under title V of the Older Americans Act of 1965 (42 U.S.C. 3056 et seq.))

No

Employment and training activities carried out by the Department of Housing and Urban Development

No

Community Services Block Grant (Employment and training activities carried out under the Community Services Block Grant Act (42 U.S.C. 9901 et seq.))

No

## B. PLAN INTRODUCTION OR EXECUTIVE SUMMARY

The Unified or Combined State Plan may include an introduction or executive summary. This element is optional.

Kentucky is focusing its efforts on the following four goal areas, including objectives that describe how the Education and Workforce Development Cabinet will accomplish the goals over the next four years.

### **GOAL 1: DELIVERY OF OPERATIONS:**

Deliver workforce services in a flexible, seamless manner to engage customers and effectively connect job supply and demand.

**Objective 1.1:** Ensure all workforce partners work collaboratively to deliver services and agree upon shared workforce outcomes through a statewide Memorandum of Agreement.

**Objective 1.2:** Modernize and utilize technological platforms to connect agency information systems to improve transparency and to provide consistent case management, performance reporting, and data sharing.

**Objective 1.3:** Braid internal and external funding to ensure comprehensive support services are available to customers.

### **GOAL 2: EDUCATION & WORKFORCE ALIGNMENT:**

Align education and workforce programs with labor market demands to connect job creators with qualified employees and prepare individuals for productive employment.

**Objective 2.1:** Align agency resources to support high-demand degree and credential attainment.

**Objective 2.2:** Develop partnerships and incentives to encourage lifelong learning and career development.

**Objective 2.3:** Increase post-secondary degree and credential attainment in high demand sectors.

### **GOAL 3: ENGAGEMENT & OUTREACH:**

Leverage new and existing strategic partnerships and innovative communication to engage, support and grow the workforce.

**Objective 3.1:** Develop a communications plan that promotes education and career services available to job seekers.

**Objective 3.2:** Implement accessible, digital outreach strategies to promote resources to target populations

**Objective 3.3:** Develop outreach strategies that promote resources available to employers.

### **GOAL 4: RESOURCE ALIGNMENT:**

Align internal and external resources to ensure efficient allocation across programs and initiatives.

**Objective 4.1:** Utilize shared data across the Cabinet for decision-making processes and efficiencies.

**Objective 4.2:** Ensure all funds are used to their greatest advantage.

**Objective 4.3:** Become a preferred employer within state government.

## 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 OCCUPATIONS

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

### III. EMPLOYERS' EMPLOYMENT NEEDS

With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

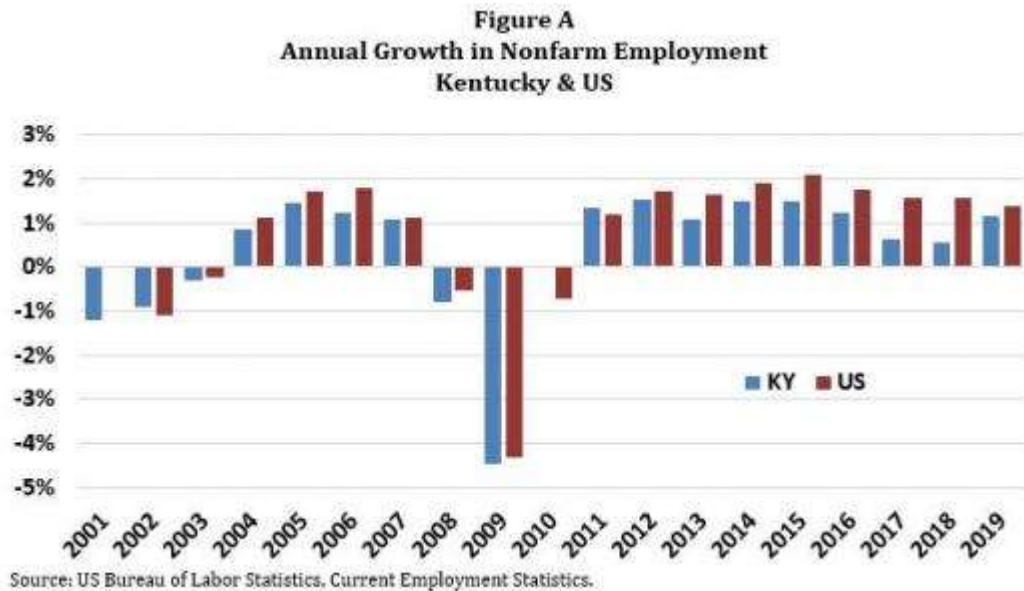
The current economic expansion is now the longest in US history, and like most areas of the US, Kentucky's economy has steadily improved over the past 10 years. This growth has caused employers to expand their payrolls and pushed the state's unemployment rate to its lowest recorded level. Many of the workers who had previously left the labor market in the years following the recession have returned, encouraged by improved prospects of finding work and higher wages.

However, while Kentucky's overall economy has grown, some areas of the state and some industries have declined. Most notable, employment in eastern Kentucky has declined. In addition, many of Kentucky's residents still face significant barriers, such as lower education levels and high rates of disabilities, that reduce labor force participation, employment, and wages. The analysis that follows examines these employment trends and illustrates how prevalent the barriers to employment are across the Commonwealth. Often the majority of Kentucky's population who face these barriers are located in urban areas. However, these barriers also affect a larger share of the populations living in the state's rural areas.



## State Employment Trends

Employment in both Kentucky and the US has increased each year since the recession ended. Figure A shows the annual growth rates of employment in Kentucky and the US. This data comes from the US Bureau of Labor Statistic's Current Employment Statistics. While Kentucky's employment initially began to recover before the rest of the nation, the state's employment has grown more slowly than the nation's since 2012.



Prior to the recession, Kentucky's manufacturing sector had been declining. However, after the recession, employment in manufacturing has increased—adding 46,200 jobs since 2010. While growth has slowed somewhat in recent years, this sector does not appear to be exhibiting the decline it faced prior to the recession. Professional and business services grew quickly in the years after the recession but appears to have declined in recent years. Growth in Kentucky's education and health care sector increase after 2015. This growth is driven primarily by improvements in the health care sector. Employment in Kentucky's information sector continues to decrease. However, this is a relatively small sector.

**Figure B**  
**Kentucky Employment**  
**by Industry**



Source: US Bureau of Labor Statistics, Current Employment Statistics.  
 Note: The scale on each chart's y-axis varies to more clearly show the changes within each industry over time.

**Table 1**  
**Change in Kentucky Employment by Industry**  
**2010-2019**

Industry	Employment 2019 (000s)	Change from 2010 to 2019	
		Total Change in Number of Jobs (000s)	Annual Average Growth Rate
Mining & Logging	9.6	-12.5	-8.8%
Construction	79.7	11.8	1.8%
Manufacturing	255.3	46.2	2.2%
Trade, Transportation, & Utilities	407.5	46.8	1.4%
Information	21.8	-2.9	-1.4%
Financial Activities	94.2	8.4	1.0%
Professional & Business Services	217.8	35.9	2.0%
Education & Health Services	288.1	33.9	1.4%
Leisure & Hospitality	201.0	33.6	2.1%
Other Services	66.7	-2.0	-0.3%
Government	312.2	-5.2	-0.2%
<b>Total Nonfarm</b>	<b>1,953.9</b>	<b>193.9</b>	<b>1.2%</b>

Source: US Bureau of Labor Statistics, Current Employment Statistics.

### Regional Employment Trends

Kentucky is divided into ten local workforce areas for administration of local workforce initiatives. These areas are shown in Figure C. The following analysis of regional employment trends uses data from the US Bureau of Labor Statistics' Quarterly Census of Employment Wages (QCEW). These data allow for a more detailed analysis of Kentucky's regions including an analysis of detailed industries, but complete data for 2019 is not yet available.

Table 2 shows employment as measured by the QCEW data at the state level. Note that the figures in Table 2 are similar to the figures reported in Table 1 but do differ slightly. These differences come from how the employment data are collected, the time period covered, and how data are reported. The state level figures in Table 2 provide a benchmark for comparing similar figures for each Local Workforce Area.

Since 2010, Kentucky employers have added an average of 21,400 jobs per year, a growth rate of approximately 1.2 percent. Three sectors declined during this period: government declined at an annual average rate of 0.7 percent; information by 2.4 percent; and mining, quarrying, and oil and gas extraction by 11.9 percent.

**Figure C**  
**Kentucky's Local Workforce Area**



**Table 2**  
**Kentucky Nonfarm Employment by Industry**

Industry	Employment 2018	Share of Total Employment	Average Annual Change from 2008 to 2018	
			Percent	Number of Jobs
Accommodation and Food Services	174,400	9%	2.0%	3,219
Administrative and Support and Waste Management and Remediation	117,400	6%	3.9%	3,834
Agriculture, Forestry, Fishing and Hunting	8,100	0%	1.8%	133
All Government	292,600	16%	-0.7%	(2,011)
Arts, Entertainment, and Recreation	22,200	1%	2.9%	576
Construction	77,000	4%	1.9%	1,375
Educational Services	12,800	1%	1.0%	128
Finance and Insurance	72,800	4%	1.1%	777
Health Care and Social Assistance	247,600	13%	1.6%	3,621
Information	20,700	1%	-2.4%	(546)
Management of Companies and Enterprises	19,100	1%	0.6%	110
Manufacturing	247,600	13%	2.2%	5,042
Mining, Quarrying, and Oil and Gas Extraction	7,100	0%	-11.9%	(1,550)
Other Services (except Public Administration)	45,900	2%	0.0%	(22)
Professional, Scientific, and Technical Services	74,700	4%	1.3%	944
Real Estate and Rental and Leasing	19,100	1%	0.8%	148
Retail Trade	213,600	12%	0.8%	1,663
Transportation and Warehousing	98,900	5%	3.8%	3,224
Utilities	3,700	0%	7.6%	203
Wholesale Trade	71,700	4%	0.7%	488
<b>All Industries</b>	<b>1,847,300</b>	<b>100%</b>	<b>1.2%</b>	<b>21,391</b>

Source: US Bureau of Labor Statistics, Quarterly Census of Employment and Wages.

Tables 3 and 4 show how employment has changed within each LDWA from 2010 through 2018. Employment in four Local Workforce Areas—Bluegrass, Kentuckiana Works, Lincoln Trail, Northern Kentucky, and South Central—grew faster than the state over this time period. EKCEP and TENCO lost employment. Employment in the EKCEP declined in most industries with mining and logging sector accounting for the largest declines.

**Table 3  
Annual Employment Growth Rates  
by Local Workforce Area and Industry  
2010-2018**

Industry	Kentucky	Bluegrass	Kentuckiana Works	EKCEP	Green River	Kentuckiana Works	Lincoln Trail	Northern Kentucky	South Central	TENCO	Other Kentucky
Accommodation and Food Services	2.0%	2.6%	2.2%	0.4%	1.4%	2.2%	2.7%	1.8%	2.9%	1.4%	1.1%
Administrative and Support and Waste Management and Remediation Services	3.9%	4.6%	5.4%	-4.7%	4.6%	3.5%	1.7%	4.9%	2.7%	3.0%	3.9%
Agriculture, Forestry, Fishing and Hunting	1.8%	0.2%	7.4%	-15.4%	8.4%	-0.3%	7.0%	-4.2%	2.5%	23.4%	4.7%
All Government	-0.7%	0.0%	-0.9%	-1.6%	-3.6%	0.0%	0.2%	-0.9%	-0.6%	-1.4%	-1.7%
Arts, Entertainment, and Recreation	2.9%	1.4%	3.6%	-5.2%	5.6%	4.3%	3.5%	4.3%	2.4%	-1.2%	1.2%
Construction	1.9%	3.6%	-0.3%	-3.9%	-0.5%	2.3%	1.0%	3.6%	1.7%	-0.8%	1.4%
Educational Services	1.0%	-0.4%	4.2%	-1.7%	1.4%	-2.2%	-2.4%	6.4%	-3.2%	-2.4%	-2.4%
Finance and Insurance	1.1%	-0.2%	-0.6%	-2.4%	2.6%	1.7%	-0.4%	1.9%	1.0%	-0.7%	1.9%
Health Care and Social Assistance	1.6%	2.1%	0.9%	1.8%	4.7%	1.3%	0.7%	2.2%	1.8%	-0.1%	0.5%
Information	-2.4%	-6.1%	-3.4%	-5.8%	-4.3%	-0.3%	-1.0%	-1.2%	-2.7%	1.3%	-3.4%
Management of Companies and Enterprises	0.6%	1.1%	-1.3%	-3.6%	-4.2%	1.9%	7.2%	-1.4%	-2.0%	1.2%	3.1%
Manufacturing	2.2%	0.9%	-0.8%	-0.4%	1.0%	-4.2%	4.7%	2.9%	2.9%	-0.5%	1.0%
Mining, Quarrying, and Oil and Gas Extraction	-11.9%	1.8%	-4.4%	-13.0%	-22.0%	-0.9%	-1.1%	-	-13.1%	-5.0%	-9.2%
Other Services (except Public Administration)	0.0%	0.2%	0.1%	-3.4%	-1.8%	0.2%	1.1%	1.2%	2.0%	-2.0%	-2.2%
Professional, Scientific, and Technical Services	1.3%	2.3%	-4.9%	-2.7%	2.8%	1.5%	-2.5%	2.4%	2.3%	-1.2%	-0.6%
Real Estate and Rental and Leasing	0.8%	0.3%	-0.1%	-2.1%	1.9%	1.0%	2.9%	1.9%	1.2%	-0.8%	-0.6%
Retail Trade	0.8%	0.8%	0.7%	-0.2%	0.3%	1.3%	0.6%	1.3%	1.4%	-0.5%	0.2%
Transportation and Warehousing	3.8%	4.3%	3.4%	-4.1%	-0.3%	4.1%	0.7%	5.7%	4.4%	-0.6%	6.0%
Utilities	7.6%	6.7%	-0.2%	14.0%	-9.0%	31.8%	-	-4.6%	-	15.5%	-9.2%
Wholesale Trade	0.7%	1.5%	-0.3%	-5.5%	-0.4%	0.8%	3.2%	1.5%	1.9%	-3.3%	-0.4%
All Industries	1.2%	1.4%	0.4%	-1.8%	0.7%	2.0%	1.6%	2.0%	1.7%	-0.4%	0.2%

Source: US Bureau of Labor Statistics, Quarterly Census of Employment and Wages.

**Table 4  
Average Annual Employment Change  
by Local Workforce Area and Industry  
2010-2018**

Industry	Kentucky	Bluegrass	Kentuckiana Works	EKCEP	Green River	Kentuckiana Works	Lincoln Trail	Northern Kentucky	South Central	TENCO	Other Kentucky
Accommodation and Food Services	3,219.4	886.7	190.7	34.1	93.4	952.5	202.0	330.3	311.8	91.2	152.4
Administrative and Support and Waste Management and Remediation Services	3,894	953	324	(162)	196	1,178	75	522	149	68	228
Agriculture, Forestry, Fishing and Hunting	133	20	16	(9)	46	(1)	17	(3)	20	1	46
All Government	(2,011)	-33	(158)	(461)	(499)	-	38	(244)	(302)	(180)	(538)
Arts, Entertainment, and Recreation	576	75	28	(15)	34	294	13	108	29	(6)	14
Construction	1,375	505	(9)	(124)	19	488	41	236	72	(26)	91
Educational Services	128	(12)	5	66	(8)	82	(5)	(31)	24	(1)	(14)
Finance and Insurance	777	(20)	(18)	(70)	88	518	(10)	118	28	(12)	72
Health Care and Social Assistance	3,621	837	140	385	530	866	63	438	241	(11)	97
Information	(546)	(298)	(43)	(80)	(27)	(24)	(12)	(19)	(28)	9	(57)
Management of Companies and Enterprises	130	29	(2)	(11)	(7)	141	33	(67)	(39)	1	10
Manufacturing	5,042	418	(115)	(17)	321	2,389	777	645	670	(49)	206
Mining, Quarrying, and Oil and Gas Extraction	(1,550)	6	(21)	(1,165)	(180)	(1)	(1)	3	(16)	(7)	(175)
Other Services (except Public Administration)	(22)	17	2	(5)	(44)	35	25	65	50	(32)	(75)
Professional, Scientific, and Technical Services	944	361	(142)	(88)	47	402	(58)	189	58	(21)	(27)
Real Estate and Rental and Leasing	148	4	(1)	(15)	12	64	19	41	11	(3)	(7)
Retail Trade	1,663	319	91	(35)	34	656	63	274	199	(47)	38
Transportation and Warehousing	3,224	899	104	(108)	(6)	1,530	12	966	305	(11)	242
Utilities	203	50	(1)	31	(23)	129	13	(12)	2	26	(12)
Wholesale Trade	488	178	(9)	(140)	(11)	195	64	163	73	(59)	(18)
All Industries	21,391	4,738	383	(2,064)	593	9,666	1,372	3,717	1,848	(267)	282

Source: US Bureau of Labor Statistics, Quarterly Census of Employment and Wages.

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

If state and local agencies can accurately identify emerging sectors and the skills these sectors will need from their employees, these agencies might be able to allocate resources to help meet these needs as they develop. Unfortunately, identifying emerging sectors is challenging as many sectors that appear to show some initial growth seem to lose momentum after a couple of years.

This analysis examines changes in employment across 3-digit NAICS codes in Kentucky to identify potentially emerging industries. This analysis used three criteria to define emerging sectors. First, employment in a 3-digit sector must be less than two percent of Kentucky's total nonfarm employment. Second, employment in the sector must have grown faster over the past three year than the state's total employment. Finally, employment in the sector must have grown in two of the past three years. This was to remove sectors that experienced a one-time large increase.

Applying these criteria to employment from 2014 to 2017 suggested several sectors that might be emerging in Kentucky. These include several subsectors of manufacturing such as plastics and rubber products; electrical equipment, appliance, and components; and fabricated metal products. Additional sectors included data processing, hosting and related services; and securities, commodity contracts, and other financial investments and related activities.

To evaluate this methodology, the same criteria were applied to data from 2011 to 2014. Employment growth from 2014 to 2017 was then analyzed for the sectors that were identified as emerging during this time period. The goal was to see whether employment continued to grow in these potentially emerging sectors. Of the 31 emerging sectors, 18, or 58 percent, continued to grow faster than the state over the next three years. Employment growth slowed for the remaining 13 sectors. Slight alterations to the criteria resulted in similar results.

These results suggest that identifying emerging sectors early is difficult to reliably accomplish, thus making it difficult for state agencies to allocate resources to training that would be specific to these industries. This also suggests that allocating resources to improving general skills that will be in demand across a boarder set of industries might be a more reliable strategy for preparing the workforce.

Employers' Employment Needs. With regard to the industry sectors and occupations identified in (A)(i) and (ii), provide an assessment of the employment needs of employers, including a description of the knowledge, skills, and abilities required, including credentials and licenses.

The US Bureau of Labor Statistics estimated that Kentucky's employment will increase by 129,000 jobs by 2026. Table 5 shows these job projections by occupational groups. Table 6 shows some of the main skills that will be needed for these new jobs.

The top four occupational groups in terms of the number of additional jobs are transportation and material moving; healthcare practitioners and technical; food preparation and service-related; and personal care and service occupations. These four occupational groups account for 64,000 new jobs. In terms of growth rates, the top four groups are personal care and service; computer and mathematical; healthcare support; and healthcare practitioners and technical occupations.

**Table 5  
Employment Projections for 2026  
by Major Occupational Group**

Major Occupational Group	Employment (000s of Jobs)			
	Current	Projected 2026	Change in Number	Percent Change
Management	102.9	112.0	9.1	8.8
Business and Financial Operations	78.0	83.9	5.9	7.5
Computer and Mathematical	31.5	36.6	5.2	16.4
Architecture and Engineering	24.6	26.2	1.6	6.5
Life, Physical, and Social Science	10.8	11.6	0.8	7.1
Community and Social Services	28.7	32.3	3.6	12.7
Legal	11.3	12.1	0.8	7.4
Education, Training, and Library	99.6	106.7	7.1	7.1
Arts, Design, Entertainment, Sports, and Media	22.6	22.9	0.2	1.1
Healthcare Practitioners and Technical	131.6	148.4	16.8	12.7
Healthcare Support	50.8	58.1	7.3	14.3
Protective Service	37.9	39.8	2.0	5.2
Food Preparation and Serving-Related	176.6	192.6	16.1	9.1
Building and Grounds Cleaning and Maintenance	60.6	67.2	6.6	10.9
Personal Care and Service	70.9	83.6	12.7	17.9
Sales and Related	195.1	196.4	1.3	0.7
Office and Administrative Support	288.2	293.0	4.8	1.7
Farming, Fishing, and Forestry	7.2	7.6	0.4	5.1
Construction and Extraction	81.1	84.4	3.3	4.1
Installation, Maintenance, and Repair	87.7	94.0	6.3	7.2
Production	207.9	206.7	(1.2)	(0.6)
Transportation and Material Moving	182.5	200.9	18.4	10.1
<b>Total all occupations</b>	<b>1,988.2</b>	<b>2,117.1</b>	<b>128.9</b>	<b>6.5</b>

Among the new computer and mathematical jobs that will be created through 2026, over half will require critical thinking skills; 45 percent will require reading comprehension; and 43 percent will require programming skills. Nearly all new jobs among healthcare occupations will require listening skills. These jobs will also require critical thinking, reading comprehension, and social skills.

Over seventy percent of new jobs created between now and 2026 will require active listening skills, 37 percent will require speaking skills, and 31 percent will require critical thinking skills. This ranking is simply based on the number of new jobs that will need each skill. It does not reflect the wages associated with the skills.

**Table 6  
Top Ten Skills**

Skill	Percent of New Jobs that Will Require Skill
Active Listening	72%
Speaking	37%
Critical Thinking	31%
Service Orientation	31%
Monitoring	21%
Coordination	19%
Reading Comprehension	18%
Social Perceptiveness	17%
Operation and Control	14%
Operation Monitoring	8%

## 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<sup>4</sup>. This population must include individuals with disabilities among other groups<sup>5</sup> in the State and across regions identified by the State. This includes—

[4] 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.

[5] 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.

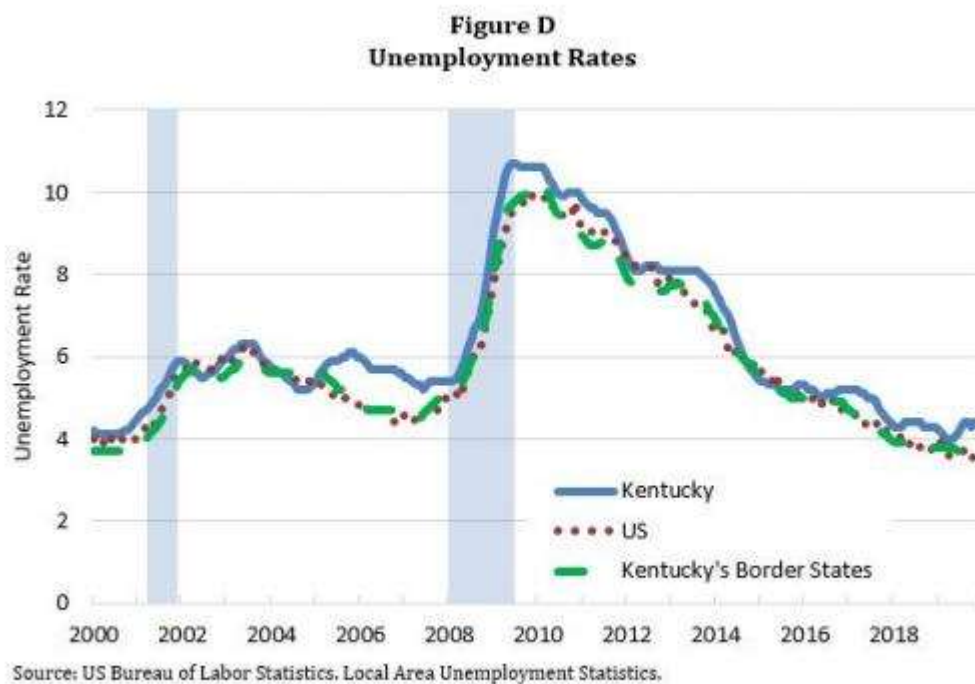
### IV. SKILL GAPS

Describe apparent 'skill gaps'.

Following national trends Kentucky's unemployment rate has steadily declined since the recession (Figure D). In 2020, the state saw its lowest level since the BLS began recording state unemployment rates in 1976. However, decreases in unemployment rates do not always reflect improvements in employment numbers. The decrease in Kentucky's unemployment rates from 2013 into 2015 was largely driven by discouraged workers leaving the labor force (Figure E). As these long-term unemployed workers stopped looking for work, they no longer counted as unemployed, which caused the state's unemployment rate to decrease.

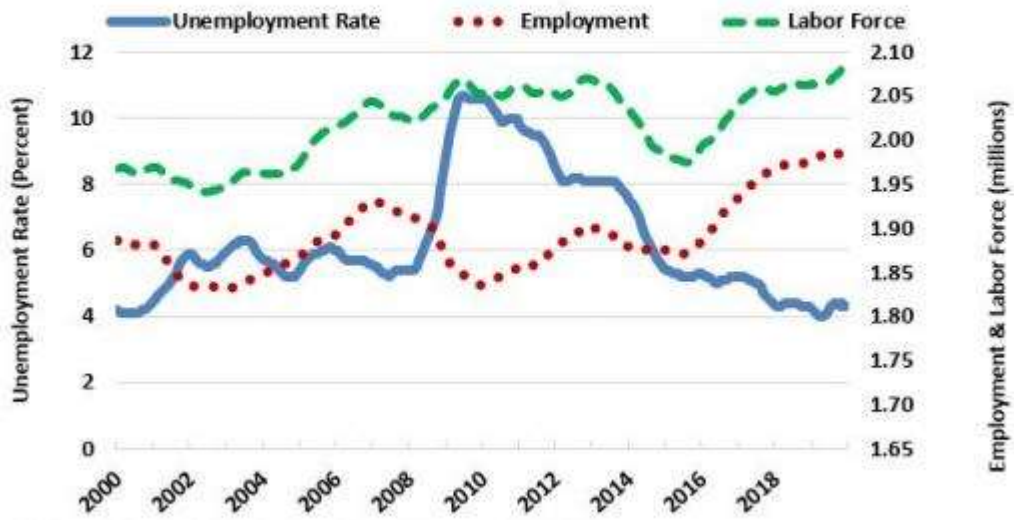
Near the end of 2015, the number of employed workers began to increase and discouraged workers began returning to the labor force. As the number of people employed increased faster than the number entering the labor force, unemployment rates continued to fall and eventually reached four percent in 2019.

Over the last few months of 2019, Kentucky's unemployment rate began to increase. This increase appears to be driven by workers returning to the labor market more quickly than workers are finding employment. The number of people employed is generally still increasing, but at a slower pace than in the past few years.





**Figure E**  
**Unemployment Rate, Employment, and Labor Force**  
**Kentucky**

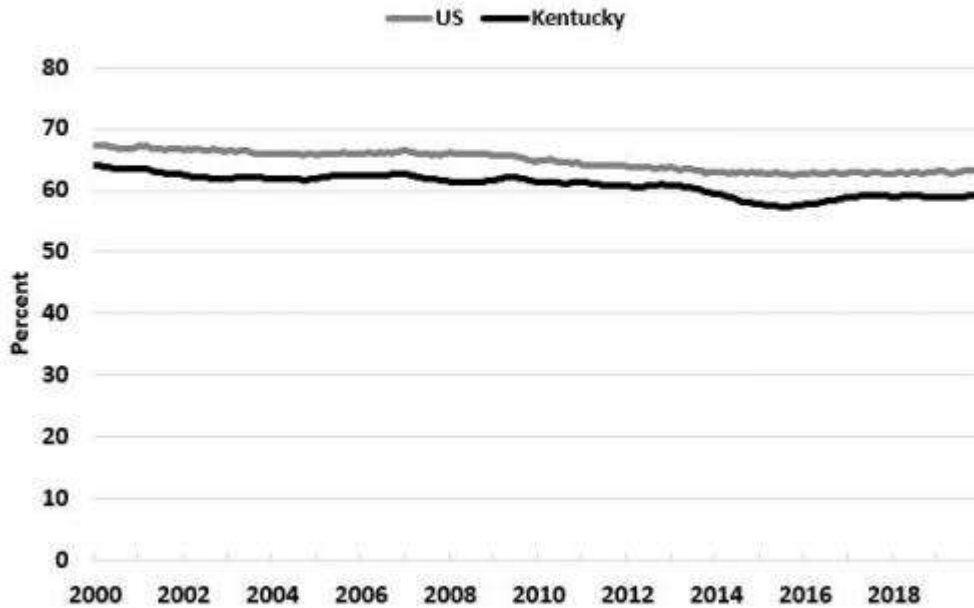


Source: US Bureau of Labor Statistics, Local Area Unemployment Statistics.

**Labor Force Participation and Barriers to Work**

The labor force participation (LFP) rate measures the percentage of the population age 16 and over who are either working or are unemployed and searching for work. LFP in the US and Kentucky has generally been declining, driven largely by the aging of the population. Kentucky’s LFP rate declined more quickly in 2013 through 2015 as workers who were unemployed for a long period stopped looking for work. Since 2015, improvements in the state’s economy have helped attract many of these workers back into the labor force. However, Kentucky’s LFP rate is still typically about 4 percentage points lower than the US rate. *See* Figure F. Several factors including educational attainment and health issues appear to contribute to this difference.

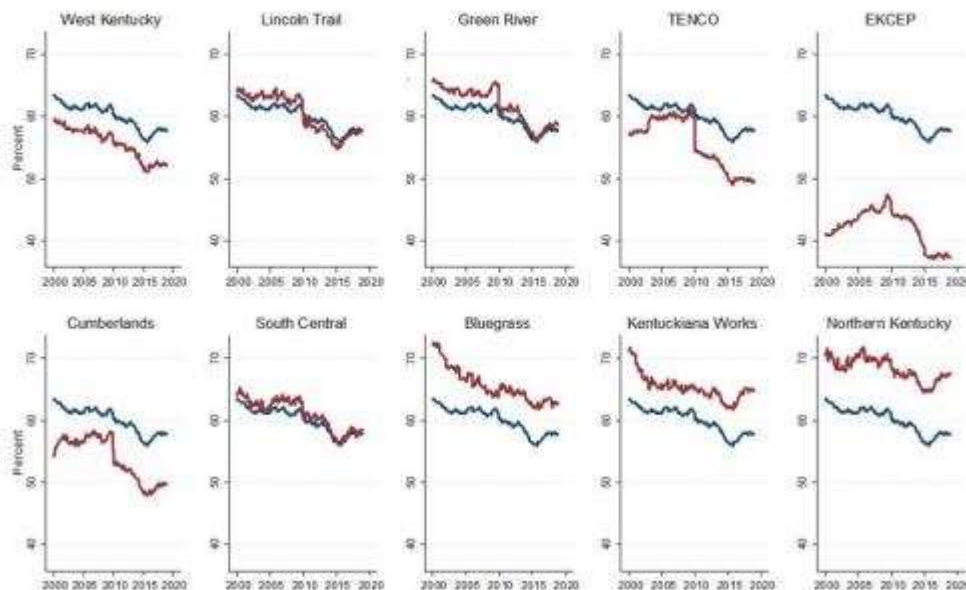
**Figure F**  
**Labor Force Participation Rates**



Source: US Bureau of Labor Statistics. Local Area Unemployment Statistics.

LFP varies significantly across Kentucky’s regions (Figure G). Urban areas including the Bluegrass, Kentuckiana Works, and Northern Kentucky LWAs have participation rates well above the state as a whole. West Kentucky, Cumberlands, TENCO, and EKCEP, however, have much lower LFP rates. These regional differences are driven by a combination of the economic conditions and the characteristics of the labor force within each region. The following section examines the prevalence of specific barriers to labor force participation in Kentucky.

**Figure G**  
**Kentucky Labor Force Participation Rate**  
**by Local Workforce Area**



**Educational Attainment.** The population in areas with low LFP tend to have lower levels of education (Table 7). While 16 percent of the state population aged 25 to 64 has less than a high

school education, the rate is 24 percent in EKCEP, 22 percent in Cumberlands, and 18 percent in TENCO. Individuals with lower levels of education are significantly less likely to work as shown in Table 8. Across the state, 39 percent of those with less than a high school education were employed. Sixty-two percent of those with a high school diploma or equivalent were employed. Employment rates among those with a college education were 77 percent.

**Table 7**  
**Educational Attainment of Population Age 25 to 64**

Local Workforce Area	No High School	High School	Some College	Associates Degree	Bachelors or Higher	Total
Bluegrass	14%	27%	25%	8%	27%	100%
Cumberlands	22%	38%	22%	7%	12%	100%
EKCEP	24%	36%	21%	8%	11%	100%
Green River	15%	35%	24%	10%	16%	100%
Kentuckiana Works	13%	27%	24%	8%	28%	100%
Lincoln Trail	15%	36%	24%	10%	16%	100%
Northern Kentucky	13%	29%	24%	8%	26%	100%
South Central	17%	35%	23%	7%	18%	100%
TENCO	18%	35%	25%	8%	14%	100%
West Kentucky	16%	34%	26%	9%	16%	100%
<b>Kentucky</b>	<b>16%</b>	<b>31%</b>	<b>24%</b>	<b>8%</b>	<b>21%</b>	<b>100%</b>

Source: Analysis of US Census Bureau, American Community Survey 5-year 2017.

**Table 8**  
**Percent Employed by Educational Attainment Aged 25 to 64**

Local Workforce Area	No High School	High School	Some College	Associates Degree	Bachelors or Higher
Bluegrass	48%	68%	73%	78%	84%
Cumberlands	29%	57%	58%	73%	81%
EKCEP	20%	45%	54%	62%	77%
Green River	43%	64%	73%	77%	82%
Kentuckiana Works	48%	67%	75%	80%	86%
Lincoln Trail	40%	66%	72%	78%	83%
Northern Kentucky	49%	70%	77%	80%	86%
South Central	43%	65%	68%	75%	84%
TENCO	31%	53%	60%	73%	80%
West Kentucky	39%	60%	66%	77%	79%
<b>Kentucky</b>	<b>39%</b>	<b>62%</b>	<b>70%</b>	<b>77%</b>	<b>84%</b>

Source: Analysis of US Census Bureau, American Community Survey 5-year 2017.

**Disability and Health.** Those with disabilities are also less likely to participate in the labor force. In Kentucky, approximately 15.8 percent of the population aged 16 to 64, or 450,700 individuals, reported having a disability that limits their activity (Table 9). Only 27 percent of disabled individuals aged 25 to 64 were employed. This is considerably lower than the 68 percent employment rates among the general Kentucky population aged 25 to 64.

**Table 9  
Self-Reported Disability**

Local Workforce Area	Prevalence of Disability (Age 16 to 64)		Employment Status (Age 25 to 64)		
	Number	Percent of Population with Disability	Employed	Unemployed	Not in Labor Force
Bluegrass	66,900	12.5%	31%	4%	65%
Cumberlands	40,200	19.9%	21%	3%	76%
EKCEP	67,300	27.8%	17%	4%	79%
Green River	22,700	16.9%	30%	3%	67%
Kentuckiana Works	82,000	12.6%	32%	6%	62%
Lincoln Trail	29,500	16.9%	32%	5%	63%
Northern Kentucky	34,200	11.6%	35%	5%	60%
South Central	31,900	16.7%	27%	4%	69%
TENCO	34,600	19.8%	22%	3%	75%
West Kentucky	41,300	16.0%	26%	4%	70%
<b>Kentucky</b>	<b>450,700</b>	<b>15.8%</b>	<b>27%</b>	<b>4%</b>	<b>69%</b>

Source: Analysis of US Census Bureau, American Community Survey 5-year 2017.

Approximately eight percent, or 18,500, of Kentucky’s residents aged 16 to 19 reported having a disability (Table 10). EKCEP has the highest disability rates in Kentucky at 11.4 percent. The Bluegrass LWA has the lowest at seven percent.

**Table 10**  
**Youth Disability Rates**  
**Age 16 to 19**

Local Workforce Area	Number	Percent of Population with Disability
Bluegrass	3,300	7.0%
Cumberlands	1,400	8.7%
EKCEP	2,100	11.4%
Green River	900	8.3%
Kentuckiana Works	3,700	7.5%
Lincoln Trail	1,200	8.5%
Northern Kentucky	1,700	7.3%
South Central	1,400	7.7%
TENCO	1,200	8.4%
West Kentucky	1,700	8.1%
<b>Kentucky</b>	<b>18,500</b>	<b>8.0%</b>

Source: Analysis of US Census Bureau, American Community Survey 5-year 2017.

Other health factors can also affect labor force participation. For example, recent research from the University of Kentucky estimated that diabetes reduces Kentucky employment by 15,700 workers (Clark et al. 2019).[1] Several studies have recently examined the impact that opioid abuse has on labor force participation. Krueger (2017) estimated that opioid abuse reduced the US LFP rate by 0.6 percentage points for men and 0.77 percentage points for women.[2] Aliprantis and Schweitzer (2018) found a much larger effect that suggested a 10 percent increase in opioid prescribing was associated with a reduction in 0.5 percentage point reduction in LFP among men and 0.14 percent reduction among women.[3] Based on this research, the University of Kentucky’s Center for Business and Economic Research estimated that increases in opioid prescribing in Kentucky were associated with reduction in labor force participation rates of 1.3 to 3.1 percentage points for Kentucky residents aged 24 to 54 (Clark et al. 2019).[4] This amounts to approximately 23,100 to 55,200 fewer workers in the Commonwealth.

**Older Workers.** Approximately 19 percent of Kentucky’s population are over the age of 64 (Table 11). While the majority of Kentucky’s older population lives in urban areas, older residents account for a large share of the population in rural areas. Labor force participation is naturally low among the older population, but many continue to work, either out of preference or need. Approximately 15 percent of residents over the age of 64 are employed or looking for work in Kentucky.

**Table 11**  
**Population Aged 65 and Over**

Local Workforce Area	Number	Percent of Area's Population Who are Age 65 and Over	Employment Status (Aged 65 & Over)		
			Employed	Unemployed	Not in Labor Force
Bluegrass	112,700	17.4%	17.4%	0.6%	82.0%
Cumberlands	54,900	21.4%	12.4%	0.2%	87.4%
EKCEP	61,500	20.2%	8.6%	0.4%	91.0%
Green River	35,600	20.9%	13.7%	0.1%	86.2%
Kentuckiana Works	146,000	18.4%	17.0%	0.6%	82.4%
Lincoln Trail	38,900	18.2%	14.4%	0.3%	85.3%
Northern Kentucky	60,600	17.1%	16.8%	0.6%	82.6%
South Central	44,700	18.9%	14.3%	0.3%	85.4%
TENCO	46,500	21.0%	10.5%	0.3%	89.2%
West Kentucky	71,200	21.6%	13.1%	0.5%	86.4%
<b>Kentucky</b>	<b>672,200</b>	<b>19.1%</b>	<b>14.5%</b>	<b>0.5%</b>	<b>85.0%</b>

Source: Analysis of US Census Bureau, American Community Survey 5-year 2017.

**English Learners.** Approximately 3.7 percent of Kentucky's residents age 16 to 64 have limited English proficiency (Table 12). Labor force participation among those with limited English proficiency is higher than the general population. However, there are significant difference in employment across regions. Nevertheless, limited proficiency with the English language can limit a workers ability to find certain types of employment and earn higher wages.

**Table 12**  
**Limited English Proficiency**



Local Workforce Area	Prevalence of Limited English Proficiency (Age 16 to 64)		Employment Status (Aged 25 to 64)		
	Number	Percent of Population	Employed	Unemployed	Not in Labor Force
Bluegrass	25,500	4.8%	73%	4%	24%
Cumberlands	4,000	2.0%	56%	2%	42%
EKCEP	2,400	1.0%	54%	4%	42%
Green River	2,600	1.9%	61%	4%	35%
Kentuckiana Works	31,500	4.9%	77%	4%	19%
Lincoln Trail	6,200	3.5%	60%	5%	35%
Northern Kentucky	10,100	3.4%	82%	4%	15%
South Central	9,200	4.8%	76%	4%	21%
TENCO	3,300	1.9%	57%	5%	38%
West Kentucky	9,500	3.7%	58%	4%	38%
<b>Kentucky</b>	<b>104,300</b>	<b>3.7%</b>	<b>71%</b>	<b>4%</b>	<b>25%</b>

Source: Analysis of US Census Bureau, American Community Survey 5-year 2017.

**Homelessness.** The U.S. Interagency Council on Homelessness reported that over 4,000 individuals in Kentucky are homeless on a typical day. Of these, approximately 534 experience chronic homelessness. The US Department of Education estimates that nearly 28,000 Kentucky students experienced homelessness during the 2016-2017 school year.

**Native Americans.** Kentucky has a relatively small Native American population. Data from the U.S. Census Bureau’s American Community Survey suggests that less than one percent of Kentucky’s residents were Native American. Approximately 53 percent of Kentucky’s Native American population aged 25 to 64 were employed—lower than the employment rate for the general population.

**Long-term Unemployment.** The slow recovery after the recession caused many workers to be unemployed for prolonged periods. This can negatively affect workers’ ability to find employment as skills can depreciate over time. Employers might also be concerned that long-term unemployment might signal concerns regarding a worker’s productivity.

Table 13 shows when individuals who were unemployed last worked. The estimates only include those age 25 to 64. Thirty-one percent of unemployed workers were unemployed for one to five years. Another 11 percent were unemployed for more than five years. This indicates that approximately 38,000 workers who are searching for employment have been unemployed for more than a year.

**Table 13**  
**Long-term Unemployed**  
**(Aged 25 to 64)**

Local Workforce Area	When Last Worked			Total
	Past 12 Months	1-5 Years	Over 5 Years	
Bluegrass	65.4%	28.0%	6.6%	100%
Cumberlands	45.9%	38.6%	15.4%	100%
EKCEP	42.2%	40.0%	17.8%	100%
Green River	69.2%	24.2%	6.6%	100%
Kentuckiana Works	61.7%	26.8%	11.5%	100%
Lincoln Trail	56.7%	29.0%	14.4%	100%
Northern Kentucky	63.7%	30.6%	5.7%	100%
South Central	60.0%	30.6%	9.4%	100%
TENCO	53.7%	34.6%	11.7%	100%
West Kentucky	57.1%	32.0%	10.9%	100%
<b>Kentucky</b>	<b>58.2%</b>	<b>30.9%</b>	<b>10.9%</b>	<b>100%</b>

Source: Analysis of US Census Bureau, American Community Survey 5-year 2017.

**Veterans.** Among Kentucky residents aged 18 to 64, approximately 5.3 percent are veterans. See Table 14. Labor force participation among veterans is similar to the general population with approximately 67 percent employed and 3.9 percent unemployed and looking for work. The Lincoln Trail LWA is home to a disproportionate share of veterans. Veteran’s living in this area are more likely to work than in the state as a whole. Fewer veterans live in the EKCEP and TENCO and those who do are less likely to work.

**Table 14  
Veterans**

Local Workforce Area	Veterans (Age 18 to 64)		Employment Status (Aged 25 to 64)		
	Number	Percent of Population	Employed	Unemployed	Not in Labor Force
Bluegrass	25,200	4.9%	70.5%	4.6%	24.9%
Cumberlands	8,400	4.3%	56.1%	2.6%	41.3%
EKCEP	8,000	3.5%	48.5%	4.0%	47.5%
Green River	6,200	4.8%	69.5%	2.5%	28.0%
Kentuckiana Works	32,200	5.2%	69.3%	3.9%	26.8%
Lincoln Trail	18,400	11.0%	71.5%	3.6%	24.9%
Northern Kentucky	17,200	6.1%	73.3%	4.6%	22.0%
South Central	8,300	4.5%	67.4%	3.6%	29.0%
TENCO	7,900	4.7%	57.4%	5.8%	36.8%
West Kentucky	14,700	6.0%	62.5%	2.8%	34.6%
<b>Kentucky</b>	<b>146,500</b>	<b>5.3%</b>	<b>67.0%</b>	<b>3.9%</b>	<b>29.1%</b>

Source: Analysis of US Census Bureau, American Community Survey 5-year 2017.

**Poverty / Low-income.** The 2020 poverty guidelines published by the U.S. Department of Health and Human Services classifies a family of four as living below the poverty level if its income is equal to or lower than \$26,200. In Kentucky, 17.9 percent of the population aged 16 to 64 live below the poverty line. Another 18.5 percent have family incomes of 200 percent of the poverty. Table 15 shows poverty rates for those aged 16 to 64 within each LWA.

Not surprisingly, employment and labor force participation is less common among individuals in families with lower incomes (Table 16). Just over 44 percent of Kentucky residents aged 25 to 64 who live at 200 percent of poverty or lower are employed. Over 80 percent of those with incomes over 200 percent of poverty were employed. These poverty statistics reflect the cumulative effects of various barriers to employment.

**Table 15  
Poverty Levels**

Local Workforce Area	Percent of Population with Family Income as a Percent of Federal Poverty Guidelines		
	100 Percent or Lower	101 to 200 Percent	Over 200 Percent
Bluegrass	17.6	17.0	65.3
Cumberlands	25.5	23.7	50.7
EKCEP	30.6	23.9	45.5
Green River	17.2	19.0	63.7
Kentuckiana Works	13.6	15.7	70.7
Lincoln Trail	14.4	18.1	67.5
Northern Kentucky	11.2	14.7	74.1
South Central	19.0	21.2	59.8
TENCO	21.9	20.3	57.8
West Kentucky	18.2	20.7	61.1
<b>Kentucky</b>	<b>17.9</b>	<b>18.5</b>	<b>63.6</b>

Source: Analysis of US



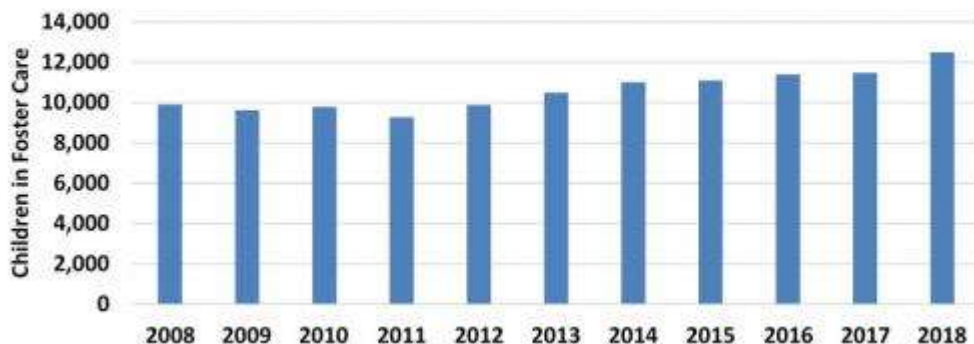
**Table 16**  
**Labor Force Participation and Employment of**  
**Those Living at or Below 200 Percent of Poverty**

Local Workforce Area	Employment Status (Aged 25 to 64)		
	Employed	Unemployed	Not in Labor Force
Bluegrass	51.7	8.0	40.4
Cumberlands	36.1	7.1	56.8
EKCEP	28.1	7.0	64.9
Green River	47.4	6.2	46.4
Kentuckiana Works	51.3	9.1	39.5
Lincoln Trail	47.4	7.1	45.5
Northern Kentucky	50.9	7.8	41.3
South Central	45.4	6.1	48.5
TENCO	37.5	6.7	55.8
West Kentucky	43.7	7.2	49.0
<b>Kentucky</b>	<b>44.2</b>	<b>7.5</b>	<b>48.3</b>

Source: Analysis of US Census Bureau, American Community Survey 5-year 2017.

**Foster Care.** The Kentucky Citizen Foster Care Review Board reported that 12,493 Kentucky children were in foster care in 2018. See Figure H. Eleven percent of foster children aged out of the system in 2017 and 2018. Foster children will likely face different challenges than the rest of the population as they attempt to gain a postsecondary education, develop skills, and enter the labor force.

**Figure H**  
**Children in Foster Care**  
**Kentucky**



Source: Kentucky Citizen Foster Care Review Board Annual Reports 2008 through 2018

**Ex-offenders.** According to the Kentucky Department of Corrections, in 2019 there were over 42,000 individuals who were on probation, parole, or some other form of supervision. Half of these individuals were on parole. See Table 17. Finding employment is one of the main challenges these individuals will face as they try to reenter society.

**Table 17**  
**Ex-offenders**

<b>LWA</b>	<b>TOTAL</b>
Bluegrass	6,225
Cumberlands	3,009
EKCEP	3,773
Green River	2,647
Kentuckiana Works	9,836
Lincoln Trail	2,614
Northern Kentucky	4,094
South Central	3,317
TENCO	1,972
West Kentucky	4,772
Unknown	10
<b>Total</b>	<b>42,269</b>

Education is one of the most important determinants of an individual’s employment and earnings. Kentucky has generally lagged behind the nation in this area. Table 18 summarizes education levels in the US and Kentucky for those ages 25 to 64. While approximately 32 percent of US residents have at least a Bachelor’s degree, this figure is only 25 percent for Kentucky’s residents. A larger share of Kentucky’s population have a high school education or less.

**Table 18**  
**Educational Attainment**  
**(Aged 25 to 64)**

<b>Education</b>	<b>U.S.</b>	<b>Kentucky</b>
No High School	11.5%	12.3%
High School	26.0%	32.1%
Some College	21.3%	21.9%
Associate Degree	9.0%	9.2%
Bachelor's and Beyond	32.3%	24.6%
<b>Total</b>	<b>100.0%</b>	<b>100.0%</b>

Source: Analysis of US Census Bureau, American Community Survey 5-year 2017.

This educational attainment gap between Kentucky and the nation will likely affect the types of jobs Kentucky can attract. Table 19 shows occupational projections for 2026 for the US and Kentucky by educational requirements for entry-level positions. Again, Kentucky is expected to add 126,8000 additional jobs, and thirty-four percent of those jobs likely require some type of post-secondary education. A larger share of the job growth, 41 percent, in the US will require a postsecondary education. States with populations that have less education will be less competitive attracting firms that require a highly skilled workforce. As jobs that require more education typically pay higher earnings, this skills gap will contribute to slower wage growth for the state.

**Table 19**  
**Occupational Projections for 2026**  
**by Educational Requirements**

Education Requirements	U.S.		Kentucky	
	Growth	Share	Growth	Share
No formal educational credential	2,373,000	20.6%	44,500	35.1%
High school diploma or equivalent	3,142,800	27.3%	27,800	21.9%
Postsecondary nondegree award	1,064,200	9.2%	10,400	8.2%
Some college, no degree	162,000	1.4%	1,400	1.1%
Associate's degree	396,700	3.4%	3,700	2.9%
Bachelor's degree	3,376,000	29.3%	29,800	23.5%
Master's degree	447,100	3.9%	5,000	3.9%
Doctoral or professional degree	555,900	4.8%	4,400	3.5%
<b>Total</b>	<b>11,517,700</b>	<b>100.0%</b>	<b>126,800</b>	<b>100.0%</b>

Source: Analysis of US Census Bureau, American Community Survey 5-year 2017.

[1] Clark, Michael W., Jenny Minier, Charles Courtemanche, Bethany Paris, Michael Childress. The Economic Impact of Diabetes in Kentucky. University of Kentucky, Center for Business and Economic Research, June 2019.

[2] Krueger, A. B. (2017). **Where Have All the Workers Gone? An Inquiry into the Decline of the US Labor Force Participation Rate. Brookings papers on economic activity, 2017(2), 1-87.**

[3] Aliprantis, D., & Schweitzer, M. E. (2018). **Opioids and the Labor Market. Federal Reserve Bank of Cleveland. Working Paper 18-07.**

[4] Clark, Michael W., Jenny Minier, Charles Courtemanche, Bethany Paris, Michael Childress. The Effects of Opioids on Kentucky's Workforce. University of Kentucky, Center for Business and Economic Research, Sept 2019.

## 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 (a)(1)(B)(iii) above, and the employment needs of employers, as identified in (a)(1)(A)(iii) 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 <sup>6</sup> and optional one-stop delivery system partners.<sup>7</sup>

[6] 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.

[7] Workforce development activities may include a wide variety of programs and partners, including educational institutions, faith- and community-based organizations, and human services.

#### 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), directly above.

#### C. STATE WORKFORCE DEVELOPMENT CAPACITY

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

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 certified Kentucky Career Centers (KCC) are the storefront, but the Workforce Innovation and Opportunity Act's (WIOA) core and optional one-stop partner services reach into communities as well. An analysis of partner programs is provided below.

#### **Employment Services**

Career centers offer a full array of employment services to help adults and dislocated workers. Unemployment Insurance (UI) claims can be made via the Internet or through a dedicated call center. UI is currently reallocating staff resources to address identified problem areas (e.g., claim processing times and assistance line wait times) by placing local field staff in hubs around the state to assist people with filing UI claims. Staff assisted reemployment services are also provided to UI claimants through case management activities such as assessment, individual employment plans, provision of labor market information and reemployment 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 use 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.

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, including resume building. If customers need individualized career or training services, they are referred to core and/or other partners to meet their identified needs. WIOA staff-assisted services focus on providing comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which includes assessment tools, interviewing and evaluation, development of an individual

employment plan, individual and group counseling, career planning, internships and work experiences that are linked to careers, and English language acquisition and integrated education and training programs

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.

### **Kentucky Skills U**

Kentucky Skills U (KYSU/Skills U) dedicates multiple resources to support instructors in providing 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 and that are critical to workplace success across all sectors and all levels of jobs.

To further support the acquisition of employability skills, KYSU 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.

### **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 support 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, community and technical colleges, baccalaureate institutions, short term training programs, intensive training programs offered by community rehabilitation programs (CRPs) and other providers, and individualized training through supported employment providers. OVR can also provide 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 KYSU, 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, also provides disability awareness training to employers.

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 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 and assist with developing soft skills, such as being on time for work, filling out a timesheet, using email, and dealing with co-workers and supervisor.

OVR also provides training directly at the residential training center it operates, the Carl D. Perkins Vocational Training Center (CDPVTC). Soft skills are taught as a part of the Work Adjustment Program (WAP) at the center. CDPVTC 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.

Finally, 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.

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.

- Weaknesses:
  - KEE Suite is a web-based system that the Commonwealth uses for its WOIA data collection and reporting, Wagner Peyser employment services case management, Trade Adjustment Act and overall reporting activities. To date, the Commonwealth continues to experience issues with KEE Suite and continues to work on various fixes. While not ready to abandon KEE Suite for another platform just yet, that decision must be made sooner rather than later.
  - 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 improving and broadening the approach to data collection and analysis, the creation and implementation of a set of statewide performance metrics measureable at all career centers, in addition to the federal performance measures, is important and needed.

- Focus Suites is viewed as a weakness because it is a dated system, that does not have mobile compatibility and increasingly difficult for users to navigate.
- Strengths:
  - The KYSTATS Longitudinal Data System continues to be a real strength for Kentucky, as well as a true commitment to cross-cabinet collaboration and to collaboration and service integration among WIOA partners.
  - Kentucky continues to make progress in aligning its workforce and educational programs with the needs of employers, through the work of the Kentucky Workforce Innovation Board (KWIB), the Kentucky Department of Education, the Kentucky Community and Technical College System (KCTCS), and the core WIOA partners.
  - Staff assistance with filing UI claims has been brought back into the career centers, allowing customers to get face-to-face help with the filing process. This approach is a strength because it will decrease mistakes with the filing process, which in turn will decrease claim processing times and result in faster payment to qualified claimants.
  - Kentucky established a Talent Pipeline Management system with KY Chamber to track real-time data related to industry demand and educational supply.
  - Kentucky is the leader in its selected indicators that were adopted for reporting performance for Effectiveness in Serving Employers. Kentucky adopted the following two indicators: the penetration rate and the repeat customer rate.
  - *State Workforce Development Capacity*. Provide an analysis of the capacity of State entities to provide the workforce development activities identified in (A), above.
  - Kentucky has strong partnerships and a network of certified career centers that assist with 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. Moreover, as discussed above, there currently technical difficulties limiting 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.

### 2. GOALS

Describe the goals for achieving this vision based on the analysis in (a) above 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 to employment<sup>8</sup> and other populations.<sup>9</sup>

(B) Goals for meeting the skilled workforce needs of employers.

[8] 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.

[9] Veterans, unemployed workers, and youth and any other populations identified by the State.

### 3. PERFORMANCE GOALS

Using the tables provided within each Core Program section, 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.)

### 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.

**Vision and Goals:** Kentucky envisions creating a workforce development system that aligns education with industry demands, prepares Kentuckians for future work, and drives economic development. Kentucky has identified four key areas that it must engage to create its ideal workforce development system:

1. Employers – Actively engage employers to drive Kentucky’s workforce development system.
2. Education – 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. 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.



Furthermore, Kentucky has outlined four goals, including objectives to obtain these goals, to assist in achieving its mission:

**GOAL 1: DELIVERY OF OPERATIONS.** Deliver workforce services in a flexible, seamless manner to engage customers and effectively connect job supply and demand.

- - - Objective 1.1: Ensure all workforce partners work collaboratively to deliver services and agree upon shared workforce outcomes through a statewide Memorandum of Agreement (MOA).
    - Objective 1.2: Modernize and utilize technological platforms to connect agency information systems to improve transparency and to provide consistent case management, performance reporting, and data sharing.
    - Objective 1.3: Braid internal and external funding to ensure comprehensive support services are available to all customers.

**GOAL 2: EDUCATION & WORKFORCE ALIGNMENT.** Align education and workforce programs with labor market demands to connect job creators with qualified employees and prepare individuals for productive employment.

- - - Objective 2.1: Align agency resources to support high-demand degree and credential attainment.
    - Objective 2.2: Develop partnerships and incentives to encourage lifelong learning and career development.
    - Objective 2.3: Increase post-secondary degree and credential attainment in high demand sectors.

**GOAL 3: ENGAGEMENT & OUTREACH.** Leverage new and existing strategic partnerships and innovative communication to engage, support and grow the workforce.

- - - Objective 3.1: Develop a communications plan that promotes education and career services available to job seekers.
    - Objective 3.2: Implement accessible, digital outreach strategies to promote resources to target populations.
    - Objective 3.3: Develop outreach strategies that promote resources available to employers.

**GOAL 4: RESOURCE ALIGNMENT.** Align internal and external resources to ensure efficient allocation across programs and initiatives.

-

○

- Objective 4.1: Utilize shared data across the Cabinet for decision-making processes and efficiencies.
- Objective 4.2: Ensure all funds are used to their greatest advantage.
- Objective 4.3: Become a preferred employer within state government.

**Performance Goals and Assessment:** Kentucky will build a workforce investment assessment system that combines the results of independent review with the collection of common performance measures and then align 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 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 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.

Additionally, KYSTATS is a distinct entity housed within the Kentucky Education and Workforce Development Cabinet tasked with the development, maintenance, and utilization of the Kentucky Longitudinal Data System (KLDS). KYSTATS is a wonderful resource and legislatively authorized to both collect and utilize data statewide from education and training programs encompassing early childhood through K-12, postsecondary, and workforce as well as develop state level metrics and evaluate and conduct research on education and workforce programs (KRS 151B.131 – 151B.134). All data integrated into the KLDS is linked across education and workforce sources through rigorous matching algorithms, which ultimately enables KYSTATS to report on education and employment outcomes across all sources of data. *See Economic and Workforce Analysis supra.*

### 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)

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)

The Kentucky Workforce Innovation Board (KWIB) is a 27-member, employer-led advisory body that advises the Governor on workforce issues and guides the strategic direction of the Commonwealth's workforce system. The mission of the KWIB is "to be a leader and catalyst in creating a comprehensive, customer-driven workforce development system that meets the changing needs of job seekers, incumbent workers and employers." Through data analysis, policy recommendations, and dialogue at the local, state, and regional levels, KWIB members serve as stewards of workforce development throughout the Commonwealth. Starting in 2017, the KWIB responded to concerns over Kentucky's workforce participation rate, educational attainment statistics and public health indicators by revisiting its workforce strategy and developing recommendations to support a lifetime continuum of training, preparation, and investment for citizens. The objective of this effort was to create a common direction for workforce development, and align workforce assets across the Commonwealth to support Kentuckians in achieving and sustaining economic self-sufficiency throughout their working lives. Through an environmental scan of Kentucky's labor market data, over 600 entities and/or individuals consisting of citizens, providers, customers, employers and workforce development leaders across the Commonwealth the following vision and strategic goals were developed to guide Kentucky's workforce partners:

- **Employer Engagement:** Actively engage employers to drive Kentucky's workforce development system. As consumers of the Kentucky's workforce and education system's human capital, employers must be deeply invested in the development of training and curriculum that shapes their future employees. The Commonwealth encourages employers (large and small) to assume leadership roles in workforce development programming at all points along the workforce lifecycle, from early childhood education through postsecondary study and upskilling of later-career individuals. The role of the employer may vary across workforce settings, ranging from providing on-site childcare for employees with pre-school-aged children, to educating teachers and parents about the opportunities available in advanced industries, to informing technical education curriculum with industry-specific requirements, to employing high school or postsecondary interns and apprentices, to actively recruiting qualified candidates facing barriers to employment. Across all of these activities, consistent industry input and guidance throughout the skills development continuum is essential to align the training of workers to the skills they will need to succeed in the workplace now, and into the future.
- **Education Completion and Attainment:** Align and integrate P-12, postsecondary, and adult education to provide lifelong opportunities for Kentuckians that prepare them for the rapidly shifting realities of work in the future. Employer engagement in the design and delivery of workforce development programs represents a catalyst for system change, one that is fundamental to the realization of a future in which the Commonwealth workforce system consistently delivers highly trained and flexible workers that create value for employers (as a direct result of their upfront contributions to program design). While a balance must continually be struck between filling immediate vacancies and skills gaps, and preparing the workforce to adapt to the technological disruptions of the future, employers are most qualified to steer the direction of education and training so that workforce programs produce the qualified workers they seek, both now and in the future.

Investments in education and training are generational prospects that take significant time to come to fruition; that said, dynamic changes in technology and the labor market require that

words like “upskilling” and “lifelong learning” become part of every Kentuckian’s vocabulary. To put education into perspective, today’s preschoolers are merely 12 years away from becoming our co-workers, and the jobs they seek may bear little resemblance to the workplace, as we know it. The Commonwealth must strive to instill a culture of lifelong learning among its residents, setting them up for success by encouraging continuous personal growth and achievement, integrating infrastructure for lifelong skills development, and eliminating gaps between education systems and the job market.

- **Workforce Participation:** Increase Kentucky’s workforce participation by creating opportunities, incentivizing workforce participation, and removing employment barriers for Kentuckians. For many Kentuckians, work is not only a source of income, but also a source of professional accomplishment, personal growth, and community. Workforce participation therefore represents a stabilizing factor in Kentuckians’ lives, an environment that regulates daily life and provides a stepping-stone to wealth creation, achievement, and personal fulfillment. At some point, however, most Americans will encounter a potentially destabilizing situation, such as a layoff or termination, a debilitating injury or illness, a criminal conviction, or other life-impacting event that results in a period of unemployment. For many Kentuckians, what begins, as a temporary setback on the road of life can become a long-term roadblock – within the Commonwealth, with a significant portion of folks having exited the labor force altogether.

Many individuals derive self-worth and identity from their work; therefore, it is no surprise that protracted periods of unemployment are correlated with depression, substance abuse, and negative health outcomes. Kentucky has one of the lowest labor force participation rates and health rankings in the nation. Therefore, it is the Commonwealth’s overarching priority to uncover and remediate the factors that cause workers to become discouraged and opt out of work.

- **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. Workforce development is a matrixed function within government, touching numerous agencies and programs across multiple Cabinets, and intersecting with industry and the providers with whom service delivery is coordinated. While a high degree of engagement across sectors and administrative divisions is necessary to administer effective workforce programs, inconsistency in defining the workforce system, lack of resource alignment across its participants, and competing priorities amongst stakeholders result in ambiguous goal-setting, siloed activity, and decisions driven more by funding sources and reporting requirements than by impact on the populations served.

As an outcome of resource alignment, a Memorandum of Agreement (MOA) (Encompassing all Goals for the support of the local Kentucky Career Center system) will be established. Its purpose is to establish cooperative and mutually beneficial relationships among the required WIOA partners and other partners whose programmatic and financial participation have been determined to be vital to accomplishing the Governor’s education, workforce and economic goals. This MOA also sets forth the relative responsibilities of the partners as they relate to the planning and implementation of the comprehensive and holistic workforce system in Kentucky at both the state and local levels. To ensure the maximum flexibility for all partners under this agreement, it is agreed that the partners may enter supplemental, agency-specific state or local agreements that further or complement this agreement. At a minimum, the partners to this MOA will agree to enforce the aspects of this agreement at the local level.

For the Commonwealth to enact its ambitious workforce agenda and affect substantive change, the system itself and the programs within it must be clearly and consistently defined, the resources invested to support it identified, and organizational structures aligned to promote consistent approaches and prevent working at cross-aims. By giving workforce development administrative structure and naming its subsidiaries, the Commonwealth can move beyond workforce as a concept and accelerate its strategy to get Kentuckians back to work and earning competitive wages.

Collectively, all partnering programs are designed to meet the needs of job seekers, students and employers in relation to their individual needs as well as meeting the demands of the economic vitality of their respective region. An educated, adaptable, qualified labor market is the primary objective for workforce development in Kentucky; this sustained improvement of the Commonwealth's economy is accomplished through the alignment of business personnel needs and skills training. This collaborative strategy includes a partnership of local and state workforce development organizations dedicated to providing proactive workforce development and skill development resources to all customers. This strategy offers a streamlined approach to assisting customers with equipping them with the many resources available by leveraging all partner resources.

Adopting a portfolio approach to workforce investment that is informed and driven by industry, and aligned to the workforce lifecycle will move Kentucky beyond the vague notion of a workforce development "system" – and towards a more dynamic, defined workforce marketplace, one where industry growth and hiring trends drive responsive policy interventions, and both employers and job seekers experience improved hiring, employment, and wage outcomes as a result of their engagement. In preparing its own strategic plan, KWIB engaged in extensive cross-sector dialogue between Kentucky's business, government, and education leaders, whose perspectives informed its content.

Beyond the logistics of how the KWIB's strategy is implemented, or how progress is measured, the most important aspect of the strategic plan is that the time to take action is NOW. Thus, the Governor created the KYWorks Collaborative which has been charged with implementation of the plan as well as significant deliverables such as: 1) Benefit Cliff and Sustainability Analysis; 2) Resource Funding Report for education and workforce development; 3) State Memorandum of Agreement for all Collaborative members and 4) Reporting of Local Boards to the KWIB on a quarterly basis. You may find more information out about the Collaborative at [https://kwib.ky.gov/Documents/KentuckyWorks\\_Collaborative\\_EO.pdf](https://kwib.ky.gov/Documents/KentuckyWorks_Collaborative_EO.pdf).

Kentucky's workforce challenges are not unique compared to those of its neighbors, or the nation as a whole; what differentiates the Commonwealth today is a recognition of the critical need to take immediate action, and the breadth of relationships that have been forged between leaders of the private and public sectors to act on the Commonwealth's commitment to its workforce.

With regard to the strategic plan as well as the work of the KYWorks Collaborative, specific actions have been outlined to take place which result in partner entities working together to accomplish the success we want to realize. Below are the actions that have been and will be taken to align programs, integrate customer service models and work within the system of career centers (comprehensive, affiliate and access sites) to serve Kentuckians.

### **Resource Alignment**

- 1st Quarter 2019: Began creation of a resource map of all federal and state funding, mapped by entity, by population and by source

- 2nd Quarter 2019: KY Works Collaborative was created which includes all members of the education, workforce and economic development system
- 3rd and 4th Quarter 2019: Analyzed data and metrics collected related to the 9 populations identified, and found gaps in funding assistance to support those populations in becoming self-sustainable
- 1st Quarter 2020: Studying the leveraging of resources by analyzing resource silos
- 2nd Quarter 2020: Initialize study of Kentucky Career Center Resources available by priority population which will assist in establishing gaps in the system for services
- 3rd Quarter 2020: Establish the MOA as related to programmatic and financial logistics of the system.

#### **Workforce Participation:**

- 1st Quarter 2018: Created and analyzed a matrix of barriers and opportunities related to nine established populations
- 2nd Quarter 2019: Created a strategic alliance with Human Development Institute to progress work forward with disability community
- 3rd Quarter 2019: Analyzed and initiated data work for KY benefit cliff analysis and self-sustainability studies
- 3rd Quarter 2019: Analyzed and tracked workforce participation rates along with other key trending data and metrics on Workforce Dashboard created by KY Center for Statistics
- 1st and 2nd Quarter 2020: Incorporating metrics associated with priority populations onto Dashboard

#### **Employer Engagement:**

- 1st Quarter 2018: Established a county level presentation to engage with local stakeholders about employer engagement and demand/supply balance (WorkReady Communities)
- 2nd Quarter 2018: Overhauled career technical education certification requirements to be locally and industry driven
- 3rd Quarter 2018: Overhauled Perkins leadership funding process to include employer participation
- 4th Quarter 2018: Launch of Talent Pipeline Management partnership with KY Chamber
- 2nd Quarter 2019: Began work-based learning team and championing efforts with industry recruitment
- 1st Quarter 2020: KYCOVI starts analysis of employer demanded credentials

#### **Education Attainment and Completion:**

- 1st Quarter 2018: Completed 10 industry led career pathways for education transition

- 4th Quarter 2018: Established Talent Pipeline Management system with KY Chamber to track real- time data related to industry demand/ educational supply
- 2nd Quarter 2019: Established metrics on the Dashboard, allowing tracking of credential completions and outcomes as related to supply, demand and overall health of the education and workforce system
- 3rd Quarter 2019: Established strawman for KY Credentials of Value Institute (KYCOVI) which includes all levels/partners of education to align transitional career pathways for students
- 1st and 2nd Quarter 2020: Begin Work-Based Learning Championing

### 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).

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 WIOA. 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. Andy Beshear is currently being advised by the KWIB, which was created by Executive Order in July 2015. In turn, the KWIB is being advised by an executive committee and several standing committees. The executive committee provides overall direction to the KWIB. Standing committees are 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 WorkReady Kentucky strategic plan so that it continues to align with this state plan. The new administration and the KWIB are working to manage and update the plan and planning process.

The KWIB will also 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 updating the current KWIB strategic plan.

## 2. IMPLEMENTATION OF STATE STRATEGY

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

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

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

The Kentucky workforce system aligns programs strategically via its organizational structure (Titles I, III and IV in same Department, KWIB participation and Cabinet-level discussions and project development, as well as Kentucky Career Center system) in an attempt to effectively provide services to business customers and job seekers.

A critical component of this alignment effort is the partnership between the local workforce development boards and the state agencies (Office of Vocational Rehabilitation, Department of Workforce Investment, and Kentucky Skills U). 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. 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.

Alignment among program and partners is the result of a comprehensive approach to WIOA service delivery and implementation. Again, each of the 10 local areas must have at least one comprehensive KCC office that provides physical access to core WIOA services.

KCC has also established reciprocal referral services for individuals with disabilities. OVR has implemented its own information and referral system to ensure that individuals with disabilities will be provided 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 Skills U (formerly KY Adult Education) provides information to local programs to assist individuals with barriers to employment to access the services for which they are eligible.



For example, GED Plus 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, a partnership between the Kentucky Community and Technical College System (KCTCS) and Skills U, 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. 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 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.

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.

## 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.

Kentucky continues to make progress in aligning its workforce and educational programs and pathways with the needs of employers, through the work of the KWIB, the Kentucky Department of Education, KCTCS, and the core WIOA partners. Further aiding alignment, the registered apprenticeship program has transitioned from the Labor Cabinet to the Education and Workforce Development Cabinet with the goal of expanding registered apprenticeships. In that vein, the one-stop partners will facilitate Apprenticeship Accelerator events at their career centers. An Accelerator is a concentrated meeting with employers to educate them about the apprenticeship registration process, and they include presentations from apprenticeship, local high schools, Kentucky Community and Technical College System, colleges, Business Services team members to show all aspects of registering and the benefits to do so. Finally, The Education and Workforce Development Cabinet has also expanded its partnership with the Justice Cabinet to offer re-entry services 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, and this effort is a critical component to ensuring the KCC'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 goals for this project.

Specifically, the Kentucky Career Centers continue to improve their efforts of coordination of services through cross training of program knowledge to all staff across all programs in order to ensure the customer can receive the basic information without having to see multiple staff. This cross training is aligned and coordinated through the One Stop Operator and are based on the needs of not only the individuals, but staffing knowledge as well.

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). In addition, 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 Department of Workforce Investment (DWI) in partnership with local and state workforce organizations is dedicated to providing proactive business services and industry skills development. Through local Kentucky Career Center Business Service networks, this partnership has laid a foundation for coordinated business services that leverage the assets of the Office of Employer and Apprenticeship Services (OEAS).

Kentucky Career Center Business Services offer a streamlined approach to assisting businesses with recruiting talent, training new and existing employees, and developing tomorrow's

workforce. At its core, the Business Service strategy consists of five primary organizations who provide direct resources and services to businesses:

- Local Workforce Development Boards (LWDB)
- Kentucky Education and Workforce Development Cabinet (EWDC)
- Kentucky Cabinet for Economic Development (CED)
- The Kentucky Chamber's Workforce Center (Workforce Center)
- Kentucky Community and Technical College System (KCTCS)

These partnering agencies strive to provide unified, efficient, quality and seamless workforce services and resources to new, existing and expanding companies within the Commonwealth.

The Kentucky Career Center Business Service strategy has four primary components:

- Identify a single point of contact for business development within each WIOA region
- Streamline workforce resource delivery
- Unify and coordinate outreach and information
- Leverage multiagency data sharing systems

The Kentucky Career Center Business Service employers' strategic objectives are:

- Create a valued workforce development system for employers.
- Establish a clear channel for employer engagement in workforce development services.
- Increase the number of employers participating in work-based learning experiences and apprenticeships, while also establishing employer champions.
- Engage employers in education efforts from P-12 through postsecondary study.
- Leverage employer data on workforce projections and training needs, using the talent pipeline management process of the Kentucky Chamber of Commerce and the local area business service network.

Successful employer engagement in the workforce system would include:

- An increase in employer engagement in education and workforce development, scaling to 3x current levels and mirroring that of neighboring states
- A projected (5x) increase in the number of registered apprenticeships and work-based learning opportunities sponsored by employers
- An established set of best practice industry exposure experiences aligning P-12 delivery with industry needs in local workforce regions
- At least 40% of Kentucky youth participating in work-based learning during their P-12 years to gain invaluable exposure to workplace skills early in life
- Streamlined business services team efforts by workforce region which focus on business retention and expansion via quality delivery of workforce services

- Establishment of 50 localized statewide talent pipeline management system consortia, which assist in delivery of real-time data, allowing for better alignment of supply and demand in the workforce

The structure of the business service is comprised of three categories: resource alignment, employer engagement, and service delivery. Category one consists of one representative from each of the state-level core partners. These agencies collaborate to ensure state administered employer resources are aligned so that companies receive unified and coordinated information and services related to their workforce development plan points.

Category two includes the local Business Services team leads as well as OEAS workforce consultant staff dedicated to employer engagement as the primary function of their job. These organizations must work together to ensure that companies receive unified and coordinated information and services related to their workforce development needs. All partners also coordinate with their regional and local colleagues to ensure there is shared information among agencies.

Category three consists of the state team that includes core partners from the EWDC, CED, KCTCS, and the Workforce Center. These organizations are responsible for delivering resources and services to employer customers.

Additional partners such as the Council on Postsecondary Education (CPE) and Kentucky Department of Education (KDE) – Career & Technical Education (CTE) serve in support roles at the local and state level in order to provide opportunities for employers to participate in curriculum development. Particularly, the use of the WIN career readiness system allows a consistent and holistic approach to career readiness with both cognitive and essential soft skill development from secondary through postsecondary education.

The partnership 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. Kentucky has resources that allow flexible and customizable training specific to company needs, through such options as reimbursable grants and tax credits for classroom training, on-the-job training, tuition and certification training, entry-level and skills-upgrade training. Additional support comes through incentives targeting job seekers with barriers, such as Work Opportunity Tax Credit (WOTC), Federal Bonding, Kentucky Unemployment Tax Credit, and partner specific workforce solutions.

In 2018, the Kentucky Education and Workforce Development Cabinet (EWDC) announced the transition of the Division of Apprenticeship from the Kentucky Labor Cabinet to EWDC's Office of Employer and Apprenticeship Services within the Department for Workforce Investment. This service, in cooperation with the U.S. Office of Apprenticeship and Training, oversees the Commonwealth's registered apprenticeship program. The goal of the transition is to increase the program's momentum by harnessing EWDC's existing statewide network to connect employers with potential employees and to provide increased apprenticeship opportunities for Kentuckians. There are over 4,000 apprentices in Kentucky in 300+ different programs currently representing 147 unique occupations.

The Registered Apprenticeship model is a flexible, employer-driven approach that provides high-quality job training and produces skilled, competent employees for Kentucky employers. The division is responsible for registering apprenticeship programs that meet federal standards, issuing nationally recognized and portable Certificates of Completion to apprentices, and promoting the development of new programs through marketing and technical assistance.

Core programs and partners gained access to a business customer relationship management system based on a Salesforce platform. Phase 1 allowed shared access to employer contacts and business needs, and Phase 2 gave the partnership the ability to add and assess employer programs and resources. This platform allows the tracking of business engagement and reporting for the aligned goal of furthering business services, and is the tool that encompasses the Kentucky Integrated Business Engagement System (KIBES).

An innovative proactive approach to align business needs to core partner services is realized through data accessible in the Dun & Bradstreet (D&B) Market Insight System. This data serves to identify businesses that are either in a growth pattern, a stable state, or on a potential downturn, signaling the necessity for early intervention for layoff aversion strategies. D&B applies two leading indicators of a business' financial growth outlook:

- Financial Stress Score provides predictive insights of the businesses that are most likely to fail within the next 12-18 months. Conversely, the Financial Stress Score enables strategic targeting of companies in strong financial condition and candidates for expansion leaning incentives
- Material Change/Opportunity Segment follows real-time business activity and operating signals to determine what businesses are demonstrating in the moment growth characteristics or showing signs of contraction or declining business activity

OEAS gathers this real time monthly data from D&B, filtered by LWDB, and distributed accordingly to provide a targeted information for all the local partners to evaluate and initiate business engagement processes.

Further engagement consists of leveraging and expanding the partnership's efforts. 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 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. In fact, fifteen of the 16 community colleges in Kentucky are fiscal agents for the AEFLA grant funds.

KYSU collaborated with KCTCS to create a new program called "GED@+Plus". The GED@+Plus program creates an accelerated option for providing education and training for adult learners through an integrated pathway model that allows students to learn academic and occupational skills at the same time. The GED@+Plus program targets working age adults who do not have a high school diploma or its equivalent. The program co-enrolls participants seeking a high school equivalency (HSE)/GED@ diploma in a KYSU program and in one of the state's top five industry sectors, allowing participants to earn both a HSE/GED diploma and a short-term (i.e., one 16-

week semester or less) certificate. GED®+Plus participants qualify for scholarships through the WRKS initiative to pay for their tuition in college classes. Skills U has 27 local providers who collaborate with the 16 KCTCS colleges to offer programs designed to meet labor market needs and increase credential attainment for adults. KYSU leadership meets quarterly with KCTCS to discuss marketing strategies, enrollment trends, and student success outcomes for GED®+Plus participants.

The Commonwealth initiated a WRKS that is dedicated to funding tuition for up to 60 credit hours of occupational training, including 350 programs, in Kentucky's in-demand sectors: advanced manufacturing, informational technology and business, healthcare, transportation and logistics, and construction trades. It also provides an annual stipend of up to \$400 for "mandatory fees". HSE/GED®-seeking students are eligible for this scholarship. Sixteen colleges and more than 70 campuses may extend GED+Plus offerings.

While the WRKS provides \$400 per year for mandatory fees, students frequently find course required books, supplies, equipment, etc. costs prohibitive. Therefore, for the first semester of GED®+Plus, KYSU committed to contributing to the costs associated with these items. Additionally, Kentucky Community and Technical College System consigned \$400 for the first 1,000 enrollees. Both partners are advocating for workforce partners to consider committing funding toward auxiliary course requirements as well as tuition. KYSU plans to offer several defined time periods in which the GED® testing fees will be waived. These measures will assist in removing barriers to enable students to remain co-enrolled and accelerate earning a HSE/GED® diploma and occupational credential.

#### 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.

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 in the Eligible Training Provider Listing (ETPL). 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, dba Kentucky Skills U

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.

#### 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, enhancing community and technical college partnerships to increase training and development options for KCC customers remains a significant need. This is an area of focus with the goal of strengthening 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 is building on the initial success of the GED Plus credential initiative and taking additional steps to more fully engage KCTCS and the CTE programs of local districts and the KDE.

KDE also supports the development of career pathways through the Carl D. Perkins State Plan.

#### 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 is to expand their use of alternate training modalities, specifically employer-driven and work-based models, as well as registered apprenticeships, on-the-job training, and customized training.

##### **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. The apprenticeship 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, dba Kentucky Skills U (KYSU)**

KYSU, an agency in the Department of Workforce Investment (DWI), 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 KYSU, which services 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.

### **GED Plus**

KCTCS and KY Skills U have partnered to bring students an innovative GED® program where students can co-enroll in both Skills U and short-term KCTCS classes and earn their GED® plus a college certificate tuition-free in one of the five top state sectors -- Advanced Manufacturing, Allied Health, Business and Computer Science, Construction and Trades, and Logistics and Transportation.

### **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. KYSU 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.

KYSU plays an active role in several initiatives in the Commonwealth. KYSU 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. KYSU 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. KYSU includes the NCRC as a performance target and will continue to focus on it as a stackable credential throughout the students’ educational journey. KYSU 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 KYSU programs are available to provide services in cases where potential or current employees are eligible for adult education.

KYSU also 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 correctional institution populations; however, adult educators support those educational experiences, offering evening classes for offenders.

## **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.

With the implementation of the current Kentucky Strategic Plan, a priority is the development of a unified and collaborative approach to service delivery in the strategic partnership model. It



is critical that all the government agencies work to meet the employment needs of business and industry by working together, taking a solutions-based approach. The Kentucky Center for Workforce Statistics (KYSTATS) assists in collecting and reporting WIOA performance outcomes through the Kentucky Workforce Dashboard at [https://KYSTATS.ky.gov/Reports/Tableau/KWD\\_2019](https://KYSTATS.ky.gov/Reports/Tableau/KWD_2019). Furthermore, KYSTATS is exploring the existing co-contracting partnership between OEAS and CED for access to the D&B data. The Commonwealth's goal is to create networking opportunities, bring awareness to the services each partnering agency delivers, and assemble the full array of services delivered to customers in a manner that is efficient and effective.

A common pain point in economic development is the skills deficiency in the current workforce, which is being addressed through cross-agency training solutions targeting strategic sectors and supported through a combination of programs and incentives. This effort is coordinated with CED and KYSTATS complementing our WIOA Title I Adult and Dislocated Worker - Wagner Peyser co-enrollment policy and service delivery approach, thus ensuring that services to career center customers are comprehensive. WIOA Title II Adult Education are provided through "Kentucky Skills U."

Additionally, through the Office of Employer and Apprenticeship Services (OEAS), the workforce consultant team is establishing an operational partnership with the Kentucky Cabinet for Economic Development (CED). Integrated into the CED business development and recruitment strategy, the workforce consultant team will provide project specific analysis of labor market information, the workforce and education ecosystem, and an overview workforce resources available to employers. Upon the project's decision to locate or expand, the workforce consultant will be responsible to align workforce partners to deliver services and resources.

## 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—

Currently, the Commonwealth of Kentucky, Department for Workforce Investment is exploring options for a new case management system because the current system (KEE Suite) lacks desired comprehensiveness. With regards to Labor Exchange services, the system of use is Focus Suites. KEE Suite is utilized for Title I and Title III programs, KARES is utilized for the Title II program, and CMS is utilized for the Title IV program. The Commonwealth is reviewing systems which will allow for the seamless integration of all programs. In the meanwhile, DWI continues to merge data files in order to accomplish the coordinated implementation of the state strategies.

### 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.)

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.
- 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.

Currently, the Commonwealth of Kentucky, Department for Workforce Investment is exploring options for a new case management system because the current system (KEE Suite) lacks desired comprehensiveness. With regards to Labor Exchange services, the system of use is Focus Suites. KEE Suite is utilized for Title I and Title III programs, KARES is utilized for the Title II program, and CMS is utilized for the Title IV program. The Commonwealth is reviewing systems which will allow for the seamless integration of all programs. In the meanwhile, DWI continues to merge data files in order to accomplish the coordinated implementation of the state strategies.

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

Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers.<sup>10</sup>

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

In 2018, Kentucky implemented local performance metrics 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. Also, UI assistance has been brought back into the career centers, allowing customers to get face-to-face assistance with filing their UI claims. Customers may also use computers available at the career center to file their unemployment claims and receive assistance from a call center.

Currently, the Career Development Office (CDO) and the Office of Vocational Rehabilitation (OVR) are supported by case management systems that respond to requests for the following programs: • Wagner Peyser Labor Exchange (KEE Suite-Kentucky Engagement Enterprise Suite) • 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 • 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:

KEE Suite is a Salesforce platform system a web-based system for its Workforce Innovation and Opportunity Act data collection and reporting, Wagner Peyser employment services case management, Trade Adjustment Act and overall reporting activities.

Focus Suites 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 CDO 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.

Also important to note is that unemployment insurance claimants who are required to perform work searches are strongly encouraged to create a KEE Suite 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 DWI 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.

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.

The Kentucky Adult Education Reporting System (KAERS) is a nationally-recognized student management system designed and maintained through Kentucky Adult Education and the Commonwealth Office of Technology. 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 KYSTATS.

The Department for Workforce Investment implemented a new case management system on October 1, 2018. KEE Suite was launched as an integrated Wagner Peyer, WIOA and Trade System with the vision of incorporating more partners in the future. Though there have been several problems with implementing KEE Suite, the need for an integrated case management system is clear.

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. KYSTATS 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)). KYSTATS currently collects data from key state agencies, such as KYSU, 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 KYSTATS' Web Intelligence Business Objects Platform (WEBI). Additionally, KYSTATS

has the ability to facilitate conversation and set common metrics for education and workforce programs (151B.133(5)).

From the Office of Employer and Apprenticeship Services perspective, while the various agencies share many customers, the 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:

### **Focus Suites**

Focus Suites 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 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. The Focus Suite shares 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.

### **Labor Insight**

Labor/Insight is another Burning Glass Technologies application used by 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.

### **WOTC**

The Kentucky WOTC Online System is used by private sector businesses and companies who may act as the employer's agent. The KY WOTC Online System allows businesses and their consultants to enter tax credit applications (and submit the applications, for legal forms holders), track the status of submitted applications, print letters and certifications, and view any power of attorney that may exist.

### **KIBES**

Kentucky Integrated Business Engagement System (KIBES) is a tool and resource to help manage business customer engagement as required by WIOA. Through the integrated tool on the Salesforce platform, partners engaged with business are able to track progress from the initial engagement to ongoing business services, thus allowing a clear picture of progress. Further, shared insight and resources can be accessed by partner staff allowing better communication and business services execution.

### **WIN Career Readiness System**

The Kentucky Career Readiness course and credential measures three foundational components: Applied Mathematics, Reading for Information, and Locating Information. These cognitive skills are considered to be foundational skills for work readiness.

The Kentucky Essential Skills Credential addresses skills including cooperating with others, resolving conflicts and negotiating, solving problems and making decisions, and taking responsibility for learning. Together these two credentials qualify an individual to be “work ready” for most employers’ needs.

### **KY National Career Readiness System**

The National Career Readiness Certificate (NCRC), a product of ACT, demonstrates a person’s work-readiness level. The KY NCRC system tracks all earned certificates by partnership members. Small and large businesses have experienced dramatic drops in turnover after using NCRC as a screening tool for many of their jobs. The objective insight provided into the job candidates helps make better hires, as well as spending less on training and retaining employees long term. There are currently over 160 thousand NCRC’s in Kentucky.

An Employer may either "require" or "prefer" a NCRC. In order to "require" a NCRC or other WorkKeys assessments, the job must be profiled. For Employers who seek to "prefer" the NCRC as a condition of hire, it is recommended that the Employer cross reference the desired WorkKeys assessments to the O'NET code of the position to be filled.

### **Dun & Bradstreet**

The Dun & Bradstreet solution for Kentucky includes two analytical scores: Financial Stress and Material Change / Opportunity Segment. Both scores are available in D&B’s Market Insight where D&B data is updated on a monthly basis. The monthly Market Insight data is filtered according to LWDB and shared with local partners for dissemination and to provide a target list of potential businesses to engage with, especially those businesses are display characteristics of early signs of decay and those that are experiencing growth, as both instances require a workforce intervention to assist the business.

### **Federal Bonding**

All Kentucky Career Centers and partner programs have access to a google docs design online form to request a Federal Bonding program fidelity bond to be issued to a business for hiring individuals from an untapped labor pool. This no cost, efficient, streamlined system allows for the business services network to better serve our customers.

## **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**

All active Kentucky policies, guidance documents, and procedures may now be found on the KWIB’s “WIOA Planning & Policy” page: <https://kwib.ky.gov/About/Pages/WIOA.aspx>. This webpage also contains a link to a “Table of Kentucky Workforce Policies, Guidance and Procedures”, which is a spreadsheet with embedded links to each specific document. The table has also been included as part of Kentucky’s State Plan filing.

Regarding specific policies, Kentucky's co-enrollment policy addresses the required co-enrollment of participants under WIOA Title I Adult and Dislocated Worker programs and Wagner-Peyser. All adults and dislocated workers who receive Kentucky Career Center services other than self-service and informational activities will be co-enrolled in Wagner Peyser and WIOA. Customers will be co-enrolled through an automated process in the state's official system of record. Staff shall ensure the correct activities are recorded for the respective programs and verify DOB/Vets information in the system of record. Customers will then be co-enrolled and counted in both Wagner Peyser and WIOA performance measures. Kentucky Career Center customers who are being served in other programs, such as SNAP E&T or Medicaid, will not be co-enrolled in Wagner Peyser and WIOA until a qualifying activity triggers co-enrollment.

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 the system of record. If the customer is receiving services at a Career Center, staff will log into the system of record and select the DOB/Vets Verification tab in the Customer Detail module. As part of the Welcome, Orientation, and Assessment, the staff will verify the customer's DOB and Vets information, if applicable. Staff will also record any activities that have been completed. Then an overnight batch process will look for activities that trigger co-enrollment and the customer will be enrolled in both WIOA and Wagner-Peyser.

Furthermore, in 2018, Kentucky undertook two major initiatives that will continue to guide the reform of system operations and policies:

- The establishment of the KWIB Strategic Plan: An Urgent Call to Action, and
- A fundamental review of WIOA policies and guidance by the Education and Workforce Development Cabinet (EWDC).

Activity stemming from these initiatives directly affects the planning and operational documents fundamental to WIOA. Because of the necessary overlap of activities, the Department of Workforce Investment created a timeline of activities on the state and local levels through 2020 that focused on two major planning requirements: (1) the timing and contents of the update of the local plan as required by WIOA Sec. 108(a) and (2) a new round of MOU /IFA development. Kentucky is also focusing on the creation of a Memorandum of Agreement (MOA) to establish cooperative and mutually beneficial relationships among the required WIOA partners and other partners whose programmatic and financial participation have been determined to be vital to accomplishing the Governor's education, workforce and economic goals.

In March 2020, DWI finalized Guidance No. 20-001 (entitled "Kentucky Career Center One Stop Certification"), which sets out the criteria and procedures for local workforce boards to evaluate and certify a Kentucky Career Center. Through the evaluation and certification process, the Local Workforce Development Boards should track the effectiveness of the KCCs in the system. Continuous improvement requires appropriate modifications that are a result of customer feedback to improve the quality of services that are being delivered. The KCC must have a process in place for customers to provide feedback and a protocol to review the feedback on a consistent basis. The process is designed to heighten the quality of services that are being delivered in a local area. The ultimate goal is the transformation of the workforce system – expanding employer engagement, workforce participation, connecting customers with

education and training opportunities, and aligning resources amongst workforce partners. WIOA requires two parts for the evaluation criteria. The first is Effectiveness, which includes customer satisfaction and Physical and Programmatic Accessibility. The second is Continuous Improvement, which includes meeting performance standards. The KWIB has added a third part -- Strategic Planning and Innovation.

It is the responsibility of the LWDB to evaluate and certify any Comprehensive Career Center, Affiliate Career Center and Access Points in its respective local area. The LWDB must adopt the established KWIB certification criteria and may establish additional criteria for KCC certification. The KWIB/DWI has established a fourteen (14) step certification process in Guidance No. 20-001 that will result in a certification determination by the LWDB.

DWI is currently working on reviewing and updating many of its policies and regularly conducts Policy Team meetings to accomplish this goal. The policies that have been finalized as part of this latest intensive review process are Supportive Services, Need to Train, ETPL, One Stop Certification, Kentucky Youth Manual, and Pell Grant.

### 3. STATE PROGRAM AND STATE BOARD OVERVIEW

#### A. STATE AGENCY ORGANIZATION

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

The Governor serves as the grant recipient for the Commonwealth. The Governor appoints all members of the KWIB who -- in conjunction with the Governor -- provide leadership across the workforce system. The Department of Workforce Investment thru the Kentucky Education and Workforce Development Cabinet, on behalf of the Governor, administers and oversees the WIOA programs and holds primary responsibility and accountability for oversight of Kentucky's workforce development system. The Governor has designated ten (10) Workforce Development Areas and the Chief Elected Officials within those areas to act as grant recipients. Leadership from the State and Local Boards are strengthened by requiring WIOA core partners to have representation on all workforce boards. The partnership is further supported by an executive order, which has mandated and non-mandated partners as a team under the auspices of the Kentucky Works Collaborative. Furthermore, a statewide Memorandum of Agreement that will tie all stake holding partners together for delivery of a comprehensive workforce and education system is currently in development.

The organization chart for Education and Workforce Development Cabinet can be found at <https://personnel.ky.gov/DHRAOrgCharts/OC-51.pdf>.

The organization chart for the Department of Workforce Investment can be found at <https://personnel.ky.gov/DHRAOrgCharts/OC-51531.pdf>.

A map of the local workforce areas can be found at [https://kwib.ky.gov/Local-Boards/Documents/Local\\_WI\\_Areas\\_Map.pdf](https://kwib.ky.gov/Local-Boards/Documents/Local_WI_Areas_Map.pdf).

#### B. STATE BOARD



Provide a description of the State Board, including—

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 scheduled for early spring. At this session an in-depth review of the workforce issues facing the Commonwealth will occur, including a discussion of the Kentucky Plan to deal with the Opioid Crisis. Additionally, the Board will work to develop strategies to implement the vision set forth by the new gubernatorial leadership.

#### I. MEMBERSHIP ROSTER

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

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.

Chairman Kevin Smith, Beam Suntory

Lieutenant Governor Jacqueline Coleman (non-voting)

Secretary Larry Hayes, Economic Development (non-voting)

Secretary Larry Roberts, Labor Cabinet (non-voting)

Jason Glass, Kentucky Department of Education (non-voting)

J. Michael Brown, Secretary of Executive Cabinet

Heidi Margulis, Humana

Jaqueline Korengal, Office of Adult Education

Lori Ulrich, Fleming-Mason Energy

Sadiqa Reynolds, Louisville Urban League

Beau Matthews, Superintendent of Barren County School District (non-voting)

Terry Sexton, Boilermakers

Ryan Holmes, EHI Consultants

Scott Pierce, Operating Engineers  
Cora McNabb, Office of Vocational Rehabilitation  
Kurtis Mishler, AxiomOne  
President of Kentucky Community and Technical College System (non-voting)  
Michael Buckentin, Logan Aluminum  
Beth Davidsson, Kentucky Chamber of Commerce  
Senator Jimmy Higdon  
Representative Bobby McCool  
Kim Menke, Toyota  
Michael Hale, Barren County Judge Executive  
Sharon Price, Community Action  
Todd Dunn, UAW  
Rob Southard, Southern Star Central Gas Pipeline  
Lynn Parrish, BitSource  
Deputy Secretary Mary Pat Regan, Education and Workforce Development Cabinet  
Aaron Thompson, Council on Post-Secondary Education (non-voting)  
Tony Georges, UPS  
Karen Trial, Hitachi  
Julie Whitis, Ignite Institute (non-voting)  
Amy Lutrell, Goodwill  
Carla Webster, Xerox  
Suhas Kulkarni, Indus, Inc.  
Jonathan Webb, AppHarvest  
Robert Blythe, Mayor of City of Richmond  
Dianne Owen Four Rivers Scholarship Foundation  
Keith Sparks, Enerfab

## 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 scheduled for early spring. At this session an in-depth review of the workforce issues facing the Commonwealth will occur, including a discussion of the Kentucky Plan to deal with the Opioid Crisis. Additionally, the Board will work to develop strategies to implement the 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.

KYSTATS 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 its strategic vision and goals, 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.

KYSTATS 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.

KYSTATS 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 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

The Kentucky Career Centers are certified every three years. In order to obtain such certification, the Local Workforce Development Boards must complete a comprehensive review of the programs and centers. Each board selects a review committee to complete this task. In addition, ongoing reviews and monitoring take place throughout the year to ensure program compliance is being met.

### 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.

KWIB, in partnership with the Education and Workforce Development Cabinet and numerous partner cabinets, agencies and outside organizations, have engaged in an aggressive effort to implement the strategic initiatives outlined in the WorkReady Strategic Plan, which was approved by the preceding Governor in 2018. In January 2020, following a review of progress to date, the newly elected Governor Beshear also approved the plan to continue to move forward. The plan serves as a blueprint for transforming Kentucky's workforce services and is 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, assessments will be occurring on several levels for the core programs in several areas.

In order to address problem areas identified by prior assessments as well as provide continuous oversight and assessment of current programs, the Governor is creating a working group called the Kentucky Works Collaborative. This group will be responsible for implementing the strategic plan and assessing the workforce system as related to its defined metrics and deliverables. Already, the workforce dashboard, created in 2019, assists with the continuous assessment of programs and deliverables, which then shapes the Commonwealth's strategies going forward. The dashboard can be viewed at <https://kystats.ky.gov/Reports/Reports>.

Additionally, the Commonwealth has established multiple committees to work on and achieve milestones as related to our four major identified objectives: Employer Engagement, Education Completion and Attainment, Workforce Participation and Resource Alignment. These committees have access to analysis tools that are continuously being built out to provide more relevant and focused information, which in turn is used to shape strategies and initiatives. By Winter 2020, the Commonwealth will have a finalized resource alignment map of all federal and state funds allocated to special populations; a benefit cliff analysis calculator; a self-sustainability calculator; a GIS map of all credentials from secondary and post-secondary education entities; and a modified strategic plan which addresses the COVID-related events and economic changes that are happening in the Commonwealth.

Our strategy and approach ensures we are using all WIOA programs and collaborating resources to effectively address the gaps in services identified through previous assessments as well as to achieve greater access and effectiveness of the programs. The assessments and metrics, which we continuously review, helps to guide us along the way.

### 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.

KYSTATS and state agencies will partner on a comprehensive approach to evaluation and research. KYSTATS 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. Kentucky is currently participating in a DOL sponsored cohort training which will provide more insight to evaluating quality programs.

## 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

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)

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)

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. 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

During grant year 2020-21, Kentucky Skills U (KYSU/Skills U) will develop a new competitive application process for federal AEFLA funding to determine the eligible providers that will be awarded funds starting July 1, 2021. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate the applicants' ability to produce measurable skill gains and other defined metrics. Through this process, KYSU will identify, assess, and award multi-year grants 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). This is a regional approach to funding distribution, meaning applicants are required to select what counties they want to provide services for and apply for a "service area." Funding will be distributed based on population needs (i.e., those without a high school diploma/ equivalent) and performance, which is based on a funding model that includes federal (i.e., Measurable Skill Gains) and state performance goals (i.e., high school equivalency diplomas).

All KYSU RFAs 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 RFAs 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 in 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.

Eligible applicants must meet or exceed a demonstrated effectiveness criterion/threshold set by the state. If the eligible applicant meets or exceeds the demonstrated effectiveness eligibility criterion, the applicant may advance to a subsequent review process and its application scored by a review panel. If the applicant does not meet or exceed the eligibility criterion, its application will not be reviewed for funding consideration. The state will adhere to the regulations in 34 CFR 463.24 which identify how to determine an applicant is an organization of demonstrated effectiveness.

## II. 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 KYSU Requests for Awards (RFAs) 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 RFAs 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 in



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.]

### C. VOCATIONAL REHABILITATION PROGRAM

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.

Effective October 1, 2018, Kentucky 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.

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.

KYSTATS 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)). KYSTATS currently collects data from key State agencies, such as KYSU 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 KYSTATS’ Web Intelligence Business Objects Platform (WEBI). Additionally, KYSTATS 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 KYSU 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.

KYSTATS 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))

KYSTATS 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 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.

##### 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.

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

KYSTATS recently began working with DWI to gather data and report on ETA 9171. Data on individual participants is collected from all Eligible Training Providers (ETP) that report to DWI. The DWI supplements this information with Participant Individual Record Layout (PIRL) data. KYSTATS, through the state longitudinal data system (KLDS) is able to match this information with postsecondary data from the Council on Postsecondary Education (CPE) and wage data from the Labor Market Information branch (LMI), part of KYSTATS.

For each core program, the data on entering, continuing and completing postsecondary education or entering or remaining in employment will be evaluated. Employment rates in the second and fourth quarters after program exit will be determined for each program to determine their success in entering or remaining in employment. Rates can also be summarized at the state and regional levels. By examining wage and employment data, KYSTATS can determine if employment is maintained throughout the four quarters. Kentucky has joined the SWIS system to help with out-of-state employments outcomes. For those continuing their education, data from CPE will show if the participant completed further credentials, including certificates, licenses or degrees.

The benefit of using the KLDS is that as individuals attain additional marketable skills, changes in their employment and wages can also be evaluated over time. In addition, Kentucky can determine the extent to which persons receiving training and education services are obtaining employment in industries and sectors related to their programs of study. Furthermore, KYSTATS has the capability with the KLDS to develop additional outcome measures, such as wage progression, to help determine the effectiveness of strategies such as career pathways.

In addition to using the federal performance measures prescribed in WIOA to evaluate the core programs, Kentucky will work with the regions to discuss development of additional indicators as needed to meet local needs. The goal of any such measure would be to provide information to allow the workforce development boards to make more informed decisions about programming and the use of funds to meet local demand. Kentucky will develop additional performance measures to the degree they provide meaningful and actionable information and data can feasibly be collected.

Finally, KYSTATS can work with local partners and relevant stakeholders to conduct program evaluation and research that examines program impacts on wages and employment, using rigorous statistical methodology to compare the labor market outcomes of individuals who participate and complete relevant programs with similar individuals who do not participate and complete these programs.

#### 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 records and UI claimant data. Requests for access follow a stringent process that is examined first by the Department of Workforce Investment, Office of Unemployment Insurance. 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 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 (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist.

"Priority of Service" means that veterans and eligible spouses are given priority over non-covered persons for the receipt of employment, training, and placement services provided under a qualified job training program. This "priority" allows a veteran or an eligible spouse to either receive access to a service earlier in time than a non-covered person or, if the resource is limited, the veteran or eligible spouse receives access to the service instead of or before the non-covered person.

It is the responsibility of the public workforce system to provide priority of service for all veterans and eligible spouses who receive services under any qualified job training program, including career assistance provided under workforce services.

For a service such as classroom training or other training services, priority of service applies to the selection procedure as follows.

- First, if there is a waiting list for the formation of a training class or other training services, then priority of service requires a veteran or other eligible to go the top of that list.
- Second, priority of service applies up to the point at which an individual is both approved for funding and accepted or enrolled in a training class. Priority of service is not intended to allow a veteran or eligible spouse to "bump" the non-covered person from that training class.

It is important to distinguish between the identification of a veteran for priority of services and the verification a veteran's status or the verification of an eligible spouse. If an individual self-identifies as a veteran or eligible spouse, at the American Job Center (i.e., Kentucky Career Center), that individual should be provided with immediate priority in the delivery of employment services. When a veteran or eligible spouse undergoes eligibility determination for enrollment (e.g., in WIOA Adult Program), it is appropriate to initiate verification of veteran status. The only employment services that require prior verification of eligibility for priority of service are those that require a commitment such as classroom training.

American Job Centers (AJCs) (i.e., the Kentucky Career Center) must ensure that veterans and eligible spouses are identified at the "point of entry" (e.g., reception area, resource area, Websites, Self Service and informational bulletin boards etc.). When identifying veterans and eligible spouses, the AJC's and other grantees and sub-grantees must ensure that veterans and eligible spouses are made aware of:

- Their entitlement to priority of services;
- The full array of employment, training and placement services available; and
- Applicable eligibility requirements for programs and services.

### **Procedure to Ensure Priority of Service at Kentucky Career Centers**

1. Identify veterans and eligible spouses when they visit service delivery points.

2. Display signs that clearly describe the priority of services and the registration process. This information must also be conveyed when veterans and eligible spouses access services electronically or by telephone.

3. It is neither necessary nor appropriate to require verification of the status of a veteran or eligible spouses at the point of entry.

4. If a person self identifies as a veteran or eligible spouse immediate priority of service is required.

5. Monitoring the priority of services will be done at the point of entry and during training or employment services.

#### **Definitions of Eligibility for Priority of Service for Veterans and Eligible Spouses:**

- **Eligible Veteran**, as specified in 38 U.S.C. 101(2), means a person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable.
- **Eligible Spouse**, as defined at section 2(a) of the JVA (38 U.S.C. 4215 [a]), means the spouse of any of the following:
  - Any veteran who died of a service-connected disability;
  - Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
    - Missing in action;
    - Captured in line of duty by a hostile force; or
    - Forcibly detained or interned in line of duty by a foreign government or power.
- Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; or
- Any veteran who died while a disability was in existence.

#### **Disabled Veterans' Outreach Program (DVOP) Referral Process:**

The Intake Staff at the Kentucky Career Centers are the first points of contact and will identify eligible veterans or eligible spouses with significant barriers to employment. Persons who self-identify at the point of entry and who have not already been determined to be eligible for DVOP services will be asked to fill out the Veteran Information Form to determine eligibility. The Veteran Information Form asks for an answer of "yes" or "no" to all significant barriers and additional designated populations in accordance with VPL 03-14, including changes 1&2, and VPL 03-19. When filling out the Veteran Information Form:

1. Answering "yes" to any of the questions in the section Barriers to Employment would indicate that the veteran or eligible spouse is eligible for DVOP services.
2. In the section 2020 Poverty Guidelines, the Poverty Guidelines chart is updated yearly in accordance with US DOL. This information can be located at <https://aspe.hhs.gov/poverty-guidelines>. A veteran or eligible spouse who is within the guidelines indicates that they are eligible for DVOP services.

The Intake Staff determines if the individual meets the criteria and eligibility requirements for DVOP services. Those that are eligible for DVOP services are referred to the DVOP. In the event that a DVOP specialist is not available, the veteran or spouse will be referred to the appropriate Wagner-Peyser or WIOA staff in addition to scheduling or referring to an available DVOP specialist by appointment.

**Significant Barriers to Employment** as outlined by VPL 03-14, including changes 1&2, and additional designated populations as outlined in VPL 03-19 include:

- A special disabled or disabled veteran, as those terms are defined in 38 U.S.C § 4211(1) and (3); special disabled and disabled veterans are those:
  - who are entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or,
  - were discharged or released from active duty because of a service-connected disability;
- A homeless person, as defined in Sections 103(a) and (b) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. I 1302(a) and (b)), as amended;
- A recently-separated service member, as defined in 38 U.S.C § 4211(6), who has been unemployed for 27 or more weeks in the previous 12 months;
- An offender, as defined by WIOA Section 3 (38), who is currently incarcerated or who has been released from incarceration;
- A veteran lacking a high school diploma or equivalent certificate; or
- A low-income individual (as defined by WIOA Section 3 (36));
- A veteran lacking a high school diploma or equivalent certificate; or
- Veterans aged 18-24;
- Vietnam-era Veterans;
- Eligible Transitioning Service Members, Spouses, and Caregivers
  - Transitioning members of the Armed Forces who have been identified as in need of intensive services (now referred to as Individualized Career Services)
  - Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities (MTF) or warrior transition units (WTU); and
  - The spouses or other family caregivers of such wounded, ill, or injured members.

Again, eligible veterans and eligible spouses who are determined to have a significant barrier to employment are referred to a DVOP specialist. Additionally, any eligible veterans or eligible spouses who are part of a designated additional population will be referred to the DVOP. These referrals will be made following an initial identification of a 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 eligible, they are presented with a screen defining priority of service and directed to their local career center for further information on services and programs.

### **Monitoring:**

The State Veterans' Program Coordinator analyzes the Performance Report for Jobs for Veterans' State Grants data generated by the Workforce Integrated Performance System (WIPS) quarterly, to include Sections:

1. Summary Information,
2. Participant Summary and Service Information,
3. Employment Barrier,
4. Core Indicators of Performance, and
5. Veterans' Priority of Service.

The generated data from the reports include covered entrants from point of entry, services provided and distinguishes from veterans and eligible spouses. The Quarterly Manager's Reports on Services to Veterans, along with onsite office validations and desk audits, are used to ensure compliance with this directive and other guidance as given by DOL ETA, VETS, and the Kentucky Education & Workforce Development Cabinet.

### **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 Title II.

Career Centers are accessible so that all customers can fully use services and resources. 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.

DWI will comply with the provisions of the Americans with Disabilities Act (ADA) and applicable federal regulations 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 Centers 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 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, DWI 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.

A statewide Memorandum of Agreement between Kentucky Workforce System Partner Programs for the Integrated Workforce System is nearing completion and execution. The purpose of this Memorandum of Agreement (MOA) between state-level workforce system partner programs is to establish cooperative and mutually beneficial relationships and successfully accomplish the following:

1. Streamlining statewide identification and sharing of common core services by function rather than by agency;
2. Effective blending of funds by function rather than agency to the extent not inconsistent with federal law;
3. Participation in a common and coordinated system of referral;
4. Participation in a common case management system; and
5. Achievement of established performance goals grouped by function rather than by agency, as defined by the Kentucky Workforce Innovation Board and the Education and Workforce Development Cabinet.

The MOA will define roles and responsibilities for the local staff and contractors, including providing the following workforce services in the KCC system:

1. Assisting individuals in obtaining employment that leads to self-sufficiency;
2. Providing employers with access to qualified and appropriately skilled employees who have been assessed, trained and possess appropriate credentials and certifications;
3. Delivering effective programs offered through a seamless and integrated workforce development delivery that eliminates duplication of services;
4. Reducing administrative costs and accommodating the needs of employers;
5. Holding participant organizations accountable for costs, appropriate use of state and federal funding, performance, and metrics; and
6. Reacting to the current demand for skilled workers by specific industries and identified sectors of unfilled jobs.

The MOA will also identify the roles and resources that workforce system partner programs will contribute to integrate service delivery and support operations of the KCC system in all areas of the state. It also is intended to reflect state programs' commitments and activities to work in collaboration to implement the following priorities of the state's workforce strategic plan:

1. Employers - Actively engage employers to drive Kentucky's workforce development system.

2. Education - 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. 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.

The long list of partner entities, state agencies, and programs that will be parties to this MOA includes:

Education and Workforce Development Cabinet

Department of Workforce Investment

Kentucky Center for Statistics

Kentucky Department of Education

Kentucky Cabinet for Economic Development

Kentucky Community & Technical College System

Kentucky Labor Cabinet

Cabinet for Health and Family Services

Department for Community Based Services

Department for Aging and Independent Living

Division of Disability Determination Services

Kentucky Justice and Public Safety Cabinet

Kentucky Workforce Innovation Board

Kentucky Council on Post-Secondary Education Conference of Presidents

Kentucky Commission on Military Affairs

Kentucky Chamber of Commerce

Kentucky Housing Corporation

Job Corps

Kentucky Association of Counties

Kentucky League of Cities

Kentucky Association of Area Development Districts

National Federation of Independent Businesses

Kentucky Human Development Institute

These parties will commit to providing integrated delivery of comprehensive workforce services in Kentucky to the job seeker and business customer in a welcoming, inclusive environment.

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

The Unified or Combined State Plan must include assurances that:

The State Plan must include	Include
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	Yes

The State Plan must include	Include
compliance with the uniform administrative requirements under WIOA section 184(a)(3);	
7. The State has taken the appropriate action to be in compliance with WIOA section 188, Nondiscrimination, as applicable;	Yes
8. The Federal funds received to carry out a core program will not be expended for any purpose other than for activities authorized with respect to such funds under that core program;	Yes
9. The State will pay an appropriate share (as defined by the State board) of the costs of carrying out section 116, from funds made available through each of the core programs;	Yes
10. The State has a one-stop certification policy that ensures the physical and programmatic accessibility of all one-stop centers with the Americans with Disabilities Act of 1990 (ADA);	Yes
11. Service providers have a referral process in place for directing Veterans with Significant Barriers to Employment (SBE) to DVOP services, when appropriate; and	Yes
12. Priority of service for veterans and eligible spouses is provided in accordance with 38 USC 4215 in all workforce preparation, development or delivery of programs or services funded directly, in whole or in part, by the Department of Labor.	Yes

## VI. PROGRAM-SPECIFIC REQUIREMENTS FOR CORE PROGRAMS

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

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

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

#### A. GENERAL REQUIREMENTS

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

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

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.

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.

With the support of EWDC, Kentuckiana Works is working to operationalize the Bi-State Plan with Region 10 Workforce Board from Indiana to advance the regional workforce. This as an example of how partnerships can advance a region’s workforce. This Plan is the first of its kind to merge interstate regions into one designated workforce hub. This significant collaboration exists between local areas Indiana Region 10 and Kentuckiana Works in order to develop the regional plan around the Louisville metropolitan area, which includes urban and rural sprawl in southern Indiana. The Bi-State Regional Plan creates an innovative picture of the region’s economy and workforce environment through rural-urban, Indiana-Kentucky strategies to attain regional goals and objections.

**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. 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.

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.

## 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.

(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 by the Governor may submit an appeal to the State Board. 29 U.S.C. § 3121(b)(6)

(2) The appeal shall be filed no later than thirty (30) 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 appeal shall be filed no later than thirty (30) days after receipt of written notification of the denial from the State Board. The appeal 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 appeal shall be simultaneously provided to the State Board in care of the Executive Director, Kentucky Workforce Innovation Board, 500 Mero Street, Frankfort, Kentucky and the Department of Workforce Investment, 500 Mero Street, 4th Floor, Frankfort, Kentucky 40601

(6) On appeal, the United States Department of Labor Secretary shall consider whether:

(i) the unit or grant recipient was not accorded procedural rights under the appeal process set forth in the State Plan, or

(ii) the unit or grant recipient meets the requirements for designation as a local area under 29 U.S.C. § 3121, as appropriate.

(7) The appeal 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).

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

(1) The Governor, through assistance of the Kentucky Workforce Innovation Board, will make the final determination of each required partner's proportionate share of statewide infrastructure costs under the State funding mechanism.

(2) Any required partner may appeal the Governor's determination on the basis of a claim that:

(a) The Governor's determination is inconsistent with the proportionate share requirements of 20 CFR 678.735(a) or;

(b) The Governor's determination is inconsistent with the cost contribution caps described in 20 CFR 678.735(c) and 678.738.

(3) The process will ensure resolution of the appeal in order to ensure the funds are distributed in a timely manner, consistent with the requirements of 20 CFR 683.630.

(4) An appeal must be made within sixty (60) days of the Governor's determination and must be submitted formally, in writing, by registered mail no later than the 60th day from the date of



receipt of the notice of denial or revocation. The appeal must be submitted to the State Board in writing.

(5) The appeal must be signed/submitted by the chief executive officer of the one-stop partner submitting the appeal.

(6) The appeal must specify the circumstances and details of the appeal.

(7) The appeal may be made only on the ground that the Governor's determination is inconsistent with proportionate share requirements in NPRM §678.735(a), the cost contribution limitations in §678.735(b), or the cost contribution caps in §678.735(c).

(8) The State Board will consider and rule on the appeal in writing within sixty (60) days of receipt.

## 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

All active Kentucky policies, guidance documents, and procedures may now be found on the KWIB's "WIOA Planning & Policy" page: <https://kwib.ky.gov/About/Pages/WIOA.aspx> (including one-stop documents). This webpage also contains a link to a "Table of Kentucky Workforce Policies, Guidance and Procedures", which is a spreadsheet with embedded links to each document in the table. DWI is currently working on updating many of these policies. Additionally, the Grievance, Complaint, and Appeal Procedures for Kentucky's Workforce Innovation and Opportunity Act Programs that are outlined above can be found at the table provided at this link as well.

### 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

For Governor's Set Aside Funding, Kentucky supports system transformation and innovation by reviewing real time data, results of current and recent projects to identify those that have positive outcomes and could benefit from additional resources. Kentucky also prioritizes technology infrastructure to ensure that both individual and employer services are supported by modern, integrated contact and customer management platforms and by staff and customer training. Leadership will identify new areas of interest and priorities that also will be addressed using set aside funding.

DWI allocates funding to the local areas for Rapid Response services. 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 plan for and respond to as quickly as possible following either an announcement of a closure or layoff, mass job dislocation resulting from a disaster, natural or otherwise; and delivery of services to enable dislocated workers to transition to new employment as quickly as possible.

The state Rapid Response unit within the Office of Employer and Apprenticeship Services (OEAS) ensures that Rapid Response is provided by the LWDB, who serves as the primary contact for all Rapid Response activities. Each LWDB area has a Rapid Response team responsible for the coordination of employment transitioning supportive services.

OEAS receives information of impending layoffs via WARN Act notices, media releases, the governor's office and referral for services from supporting partners, i.e. CED, Labor Market Information programs, local boards and chief elected officials. OEAS 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. The LWDB coordinator is responsible for reporting activities through KIBES, a comprehensive integrated management and reporting system that allows partners to share activities.

Whenever possible all contact occurs prior to a layoff date, and is onsite at the company 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 team discusses resources and services available to help the employer manage the layoff and identify the specific needs of the affected employees. OEAS provides the local Rapid Response team a D&B customized list of employers with a like NAICS code and growth potential that are in proximity of the affected business. This information is to be used as resource for targeted hiring efforts and to assist in the re-hiring of the affected workforce.

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 OEAS, CDO, KY Skills U, CPE, OVR
- State and local health and family services programs
- Local health departments
- Trade Adjustment Assistance Program (if qualified)
- The USDOL Employee Benefit Security Administration
- LWIOA one-stop system Dislocated Worker Program services

Rapid Response services are designed to be seamless with other local one-stop services. Employees and employers receive one-stop service information during their respective service sessions. 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.

Furthermore, statewide layoff aversion strategies are 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 business' needs. Kentucky's state Rapid Response functions as a service of the Business Services Teams within OEAS 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 through partnerships with CED, the Labor Market Information, local boards and chief elected officials to meet the needs of the employer and employee. This positive, proactive business-friendly service is promoted when layoff aversion services can provide labor pool data to CED.

Moreover, targeting businesses that display early signs of decay to avoid layoffs is also possible through Dun & Bradstreet Market Insight. By pairing Financial Stress and Material Change/Opportunity Segment Scores, local Rapid Response teams can understand the current trajectory as well as the future outlook of businesses in their region. For example, does a company show Low Financial Stress and Growth Material Change? Or, is an employer in a Medium Financial Stress and Contraction Material Change category? Having this insight can help the team build a thoughtful business engagement strategy and anticipate what resources an employer may need, such as training, equipment, and/or funding. As an early warning mechanism, OEAS distributes monthly reports detailing business whom are an opportunity or layoff aversion.

#### 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/](http://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. These guidelines will be followed with the agency 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 trainings.

## B. ADULT AND DISLOCATED WORKERS 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.

As the Education and Workforce Development Cabinet works to place more emphasis on work-based learning, we continue to work with employers who can include both a training and educational component to the job. We continue to revamp all programs, WIOA Title I and Trade, to include more on-the-job training, work experience, and registered apprenticeship opportunities

### 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. In fact, Registered Apprenticeship has transitioned from the Labor Cabinet's Department of Workplace Standards to the Education and Workforce Development Cabinet's Department of Workforce Investment. This administrative move will harness EWDC's existing statewide network to connect employers with potential employees and to provide increased apprenticeship opportunities for Kentuckians. It will also enhance the pathway from education to workforce by giving employers quicker access to a large pool of skilled professionals. Currently, there are over 2,000 apprentices in Kentucky in over 200 programs representing over 100 different occupations.

An administrative regulation (787 KAR 3:010) recently promulgated by the EWDC set new standards for registration of apprenticeship programs in Kentucky in order to safeguard the welfare of apprentices, promote apprenticeship opportunities, and to extend the application of those standards by prescribing policies and procedures concerning the registration of

acceptable apprenticeship programs with the Office of Employer and Apprenticeship Services. These standards cover the registration, programmatic review, cancellation, and deregistration of apprenticeship programs and of apprenticeship agreements.

Finally, the one-stop becomes a registered sponsor of apprenticeships in the form of an Intermediary. They register the apprentices, help them to receive the Related Technical Instruction and work with employers to place them in the jobs the employers need. They monitor the apprentices' progress and present them with their certificate when the apprentice completes, or they place the apprentice into a position with a registered employer and they transfer the apprentice into their program.

### 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).

In August 2015, Kentucky unveiled its 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 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 entire process is conducted completely online and can be used from a wide array of platforms and machines. 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>). Step 2: Complete the provider application. Step 3: Complete program application. Step 4: Register and upload student level data with the Kentucky Center Workforce Statistics (KYSTATS). Note: KEWES 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. KYSTATS 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, KYSTATS was the ideal partner for DWI 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 KYSTATS already has access to that data.

Specifically, the Kentucky Career Center's guidance for Eligible Training Provider List (ETPL) Application and Approval Process states as follows:

## **ETPL Application Process**

The application process begins with the submission of three types of information:

1. Information regarding the Training Provider Agency or Entity
2. Information about Program Offerings
3. Student Data Collection

For information referenced in numbers 1 and 2, the information is collected via the ETPL website (<https://etpl.ky.gov>). The third piece is collected through a partner agency, the Kentucky Center for Statistics (KYSTATS).

The following is an overview of the steps required for completing the application process:

1. **Creation of ETPL Account:** Using the ETPL website (<https://etpl.ky.gov>), providers create an account to access the system. Providers must provide basic information such as Federal Employee Identification Number, email and designation of 'provider type.' Providers fall under one of four categories:
  1. HEA Title IV Funded School
  2. Proprietary School
  3. Registered Apprenticeship
  4. 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).

**Please Note:** Any private, for-profit provider of training classes within Kentucky must have registered and received a proprietary license issued by the Kentucky Commission on Proprietary Education before they may be included on the ETPL. More information about the Kentucky Commission on Proprietary Education can be found at <http://www.kcpe.ky.gov/>.

Upon creation of the ETPL account, the provider submits the necessary information to the state's ETPL Coordinator. Once the information is reviewed and the account is approved by the Coordinator, the provider receives approval to access the ETPL site.

1. **Completion of the Provider Application:** The Provider Application is located within the ETPL website and captures pertinent information about the provider. Providers must successfully complete this step before training programs will be considered for approval and inclusion. Information collected on the application includes:
  - Year institution/entity established
  - Proprietary license number (if applicable)
  - Refund policy information
  - Narrative discussions regarding ability to provide training to individuals who are employed; ability to provide training to those with barriers to employment; how the provider is partnered with local business; and how training services align with local, in-demand industry sectors and in-demand occupations
  - Compliance with the 1990 Americans with Disabilities Act (ADA)
  - Provider's ability to provide an accessible training site to those with limited mobility

- How provider collects student data (required for WIOA reporting)
  - A copy of the provider's Equal Opportunity Employment Plan
  - A copy of the provider's Limited English Proficiency Plan (LEP)
1. **Completion of Program Application\***: Providers must complete an application for each program they wish to be included on the ETPL. Information collected for each program includes:
- a. Program name
  - b. CIP code
  - c. Training program description
  - d. Date program established
  - e. Tracking plan to gather student data (required for WIOA)
  - f. HEA status (approved or not)
  - g. Degree or certificate awarded
  - h. Length of training program
  - i. Availability of online program
  - j. Costs of training program (tuition, textbooks, supplies, fees, miscellaneous costs)
  - k. Address of training program (Providers with programs at multiple locations/campuses do not have to submit multiple applications; instead, they can list multiple locations for each program.) Please note that -- regarding WIOA performance indicators -- "Degree or Certificate Awarded" is the field designed to capture 'credential attainment' for each program submitted. In most areas of Kentucky, training investments have been explicitly linked to target industry sectors and high-demand occupations. These investments are individual training accounts (ITAs), and an area of focus for the Career Centers has been 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" industry-recognized credentials, which can act as a bridge to attainment of post-secondary credentials. Moreover, registered apprenticeships, on-the-job training, and customized training are all approaches that can be targeted for increased use and expansion in partnership with post-secondary institutions like KCTCS and others. The Commonwealth, its 10 LWDA Boards, its Council on Postsecondary Education and its Kentucky Adult Education Office (Skills U) work together to ensure sufficient numbers and types of training providers and programs are available to maximize customer choice while maintaining the quality and integrity of training services. DWI will use the information provided in the ETPL applications to inform customers and stakeholders about these choices and their attendant quality through the ETPL website, the KYSTATS website and other related public materials as well as the ETP annual performance report. Regarding the ETP annual performance report, as discussed above, KYSTATS has the authority to collect and link data to evaluate education and workforce efforts in the Commonwealth



and develop reports and provide statistical data about these efforts. Because of its expertise in data collection and an established systemic infrastructure, KYSTATS was the ideal partner for DWI to timely and accurately collect data to be used for the ETP annual performance report. Providers are given detailed instructions on how to register, as well as templates for submitting data. Currently, ETPs submit annual performance data in January. A provider commits a substantial violation of the requirement to timely and accurately submit all required information when the required annual report is not submitted.

2. **Register with and upload student data to KYSTATS:** The KYSTATS website, <https://kystats.ky.gov>, gives detailed instructions on how providers can register and submit student level data. **PLEASE NOTE:** In-state colleges and universities that submit their student level data to the Council on Postsecondary Education (CPE) are exempt from this step because KYSTATS already has access to CPE's information.

*\*Application Process for Registered Apprenticeship (RA) Programs:* Because of the difference in the nature and oversight of the programs, the path for application to ETPL is somewhat different for Registered Apprenticeship Programs. By WIOA statute (Section 122), all Registered Apprenticeship Programs that express interest in being listed on ETPL must be included. Registered Apprenticeship Providers still must create an account and register on the ETPL website. However, they do not have to complete the Provider Application as their inclusion in the state's RA listing serves as approval. Once the RA program applies—and inclusion is verified on the state RA list -- the program will be approved by the state's ETPL Coordinator and placed on the ETPL website. *See Application Process for Registered Apprenticeship programs infra.*

### **ETPL Approval Process**

Once the provider has completed all necessary application steps, the state ETPL Coordinator will review and approve programs. Programs that meet all requirements, and that fall within one of the in-demand industry sectors utilized by the ten local workforce development areas, will be approved. Programs that do not meet all requirements, or that fail to send complete information, will be placed in pending status until the issues can be resolved or requirements can be met. Programs that fall under the 'proprietary' category can also be placed in pending status if there is an issue with their good standing with the Kentucky Commission on Proprietary Education. Once issues are resolved, the proprietary school can be placed in good standing.

### **Removal from the ETPL**

Removal from the ETPL may occur for various reasons, including

1. Training Provider representatives may, in writing, request to have their school and/or program removed from the ETPL for any reason at any time, and the ETPL Coordinator will oversee that removal within 15 days.
2. Training Providers that willfully and knowingly submit false information will be removed and will be notified of the removal in writing by the ETPL Coordinator within 15 business days.
3. Training Providers that fail to meet required Subsequent Eligibility Requirements will be removed and will be notified of the removal in writing by the ETPL Coordinator within business 15 days.

4. Training Providers that fail to maintain required certifications and licenses will be removed and will be notified in writing of the removal by the ETPL Coordinator within 15 business days.

Written appeals related to the removals described above in subsections (b), (c), and (d) will be accepted by the ETPL Coordinator for up to 15 days following the date of the removal notification. Said Coordinator will respond with a final decision within 15 business days.

A provider commits a substantial violation when the required annual report is not submitted.

### **Subsequent Eligibility Determination**

Programs will be evaluated on a biennial basis to determine subsequent eligibility based on student performance data. In order to remain on the list, providers must maintain a completion rate of 20% and an entered employment rate of 50%.

Importantly, the coronavirus pandemic has again brought to light that rural citizens of Kentucky continue to struggle with access to digital services. While institutions of higher education have assisted in bringing better and wider delivery of digital services to rural areas, certain pockets of the state still have little to no access. In these circumstances, participants need access to local options that present little to no transportation obstacles, which is another long-standing concern for some of these rural areas. Access to local options is also an obstacle for many in our urban areas, but for different reasons. Urban areas typically offer reliable digital access, but the cost to that access and to enter training programs that depend on reliable access is sometimes too expensive for potential participants. In these circumstances, participants need a wide variety of available programs as do their rural counterparts. In both cases, DWI staff and providers are cognizant of the requirement to develop and offer programs that are accessible and tailored to the needs of each region in the Commonwealth. Programs that do not meet this criteria will not maintain their eligibility.

Regarding data collection, ETPL data collection is done in partnership with the Kentucky Center for Statistics ([www.kystats.ky.gov](http://www.kystats.ky.gov)). ETPL data provided through that partnership is available to other state agencies via the KYSTATS website.

### **Program Performance Listing on ETPL (Program Report Card)**

In allowing for greater informed consumer choice, the following performance data for each program will be displayed with the program listing:

1. completion rate (number completed);
2. entered employment rate (employed second quarter after exit);
3. employment retention rate (employed fourth quarter after exit);
4. average earnings (median earnings second quarter after exit); and
5. skills credential.

### **Optional Local Board Performance Standards**

Local boards, with the creation and implementation of local written policy, have the option of requiring higher levels of performance for programs, as well as requesting additional performance information from providers.

### **Submission of Student Level Data**

Training Providers will be required to submit student level data on ALL participants in listed programs each year for inclusion on ETPL. This information will be submitted through the KYSTATS website, <https://kystats.ky.gov>. Programs cannot be approved until data submission has been accepted and passed necessary validation of completion. The list of required data is found on the KYSTATS website. All data must be submitted no later than January 31<sup>st</sup> of the following program year.

### **Exclusions from Performance Calculations**

Individuals may be excluded from performance if they did not complete the course/program due to any of the following: 1) institutionalized; 2) health/medical or family care; 3) deceased; or 4) member of military forces called to active duty.

### **Utilizing Out-of-State Training Providers**

Kentucky allows out-of-state schools/programs to apply to be on the ETPL if the school or program accepts Kentucky Educational Excellence Scholarship funding ([www.kheaa.com](http://www.kheaa.com)). Out-of-state providers must apply individually to be placed on Kentucky's ETPL

### **Compliance and Monitoring**

Training Providers that receive federal financial assistance under WIOA Title I must comply with the Americans with Disabilities Act (ADA) of 1990 and the nondiscriminatory and Equal Employment provisions of federal law. Compliance for both is monitored through the application process and a desk review of submitted documents and plans. Performance monitoring of providers will take place through the yearly submission of student data and subsequent analysis.

### **Application Process for Registered Apprenticeship Programs**

Minimal information, such as occupation(s), name and address of the Registered Apprenticeship program sponsor, Related Technical Instruction provider and location, method and length of instruction, and number of active apprentices, is required for Registered Apprenticeship programs to be placed on the ETPL. Registered Apprenticeship programs on the ETPL are available to every LWDA in the Commonwealth. Registered Apprenticeships will remain on the ETPL as long as the program is in good standing with United States Department of Labor (USDOL)/ Office of Apprenticeship (OA) or until the sponsor notifies the state that it no longer wants to be included on the ETPL. Guidance has been provided to Local Workforce Development Boards (LWDBs) on how to implement priority of service of the adult and veteran populations.

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. Local areas must have written policies that delineate how they will give priority of service and must adhere to these policies. DWI 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 information about requesting funds, funds not subject to transfer, considerations, and monitoring.

#### C. WITH RESPECT TO YOUTH WORKFORCE INVESTMENT ACTIVITIES AUTHORIZED IN SECTION 129 OF WIOA—

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.[11]

[11] 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 both at the state and local level to ensure the youth elements are being made available to all youth and that youth are meeting 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.

Developing youth programs to specifically target the out-of-school youth population remains a focal point of the state youth program design and the KWDB's strategic plans have combined 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. Events coordinated between local boards, educational partners, and employers frequently take place around the state to ensure Kentucky's youth are aware of industry needs. The Commonwealth continues to emphasize career pathway development and talent pipeline management in order to leverage and align core programs. Kentucky is planning to build a state-level work-based learning continuum with consistent definitions, performance metrics and high-quality service indicators across multiple state level partners. 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. Additionally, resources will 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. [12]

[12] Sec. 102(b)(2)(D)(i)(I)

The Commonwealth supports the local workforce areas in designing youth programs tailored to the needs of in-school and out-of-school youth in their local communities. Stated in the regulations at 20 CFR 681.420 (b), the KWDB's must describe the design framework for the youth program and ensure the availability of the 14 program elements amongst their service delivery plan. There must also be a formal partnership agreement in place between the local boards and all service providers incorporated in their framework. Monitoring and technical assistance continue to be provided to guarantee that local area policies and procedures meet requirements of the WIOA youth program design. Dedicated DWI youth program staff disseminate updates and guidance from the U.S. Department of Labor and others. Performance information, reports and trainings are provided to staff. Best practices are shared at all levels, including presentations at regional DOL events.

The paid and unpaid work experience program element is commonly executed throughout the Commonwealth. WIOA and 20 CFR § 681.590(a) require that a minimum of 20 percent of local area funds for Title I Youth Program be spent on work experience. This, in turn, has created an avenue to appropriate valuable pre-apprenticeship programs and work based learning opportunities around the state; collaborations with Advantage Alliance Kentucky, AMTECK, Metalsa, KY Fame, and TRACK are few examples that display accomplishment of this program element.

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 lack 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.

“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 DWI 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).)

Not applicable

4. A DESCRIPTION OF THE ROLES AND RESOURCE CONTRIBUTIONS OF THE ONE-STOP PARTNERS.

Not applicable

5. THE COMPETITIVE PROCESS USED TO AWARD THE SUBGRANTS AND CONTRACTS FOR TITLE I ACTIVITIES.

Not applicable.

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.

Not applicable

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.

Not applicable

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.

Not applicable

#### 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:
  - A. MONITOR THE PROGRESS IN IMPLEMENTING THE WAIVER;
  - B. PROVIDE NOTICE TO ANY LOCAL BOARD AFFECTED BY THE WAIVER;
  - C. PROVIDE ANY LOCAL BOARD AFFECTED BY THE WAIVER AN OPPORTUNITY TO COMMENT ON THE REQUEST;
  - D. ENSURE MEANINGFUL PUBLIC COMMENT, INCLUDING COMMENT BY BUSINESS AND ORGANIZED LABOR, ON THE WAIVER.
  - E. COLLECT AND REPORT INFORMATION ABOUT WAIVER OUTCOMES IN THE STATE'S WIOA ANNUAL REPORT.
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.

### **Requested Waiver**

The Commonwealth of Kentucky is requesting a waiver of the required collection and reporting of performance-related data on all students participating in training programs listed on the Commonwealth's Eligible Training Provider List (ETPL), as outlined in the Workforce Innovation and Opportunity Act (WIOA) Sections 116 and 122.

### **Background**

Since the passage of WIOA in 2014, Kentucky has worked diligently to understand and implement the new provision regarding Eligible Training Providers. To this end, on July 1, 2016 the Commonwealth released the attached ETPL policy and subsequently created a user-friendly online portal for the submission, review, and approval of eligible training programs and providers. While we recognize the value and importance of monitoring provider performance and sharing this information with our customers, requiring training providers to produce data on all individuals instead of just WIOA-funded customers places an undue burden on providers to collect, enter, and report excessive data.

Despite our efforts, we have faced numerous challenges while working to fully implement the WIOA ETP requirements, which include:

- Requiring training providers to provide data on all individuals instead of simply WIOA-funded participants has dissuaded some providers from seeking inclusion on the ETPL to the detriment of customer choice.
- Local workforce board lack of commitment and adoption of cohort and/or customized to ensure that each area has sufficient numbers of, and diversity of, training providers necessary to create an effective marketplace of training programs that are responsive to employer needs and provide high-growth jobs in targeted sectors for customers.
- Reducing the burden on training providers to submit performance information to the state which may not be readily accessible.
- Lack of control or oversight of non-WIOA students attending training, so complete and accurate information is very difficult to ascertain.
- Proprietary schools do not currently have a statewide system to report student data, and as such, there is no way to automatically match students with other data sources to calculate outcomes. This results in a large reporting burden on these types of training providers.
- Proprietary schools would have to collect sensitive information, such as social security numbers, etc., on all students for the state to match wage and earnings information on students utilizing ETPL programs, which may leave students open to identity theft, privacy considerations, etc.
- Many of the students attending Kentucky's career and technical college system, as well as other training providers, may do so on an episodic basis and not necessarily with the sole intent of achieving a degree or credential. If these students are not WIOA-funded, it is unfair for these students to lower the training providers overall performance data.
- Collecting, validating, and providing information on eligible training programs to WIOA participants in a way that helps them make good decisions about how to use their individualized training accounts or other federal training dollars.

### **Actions to Remove Barriers**

Currently there are no state or local statutory or regulatory barriers to implementing the requested waiver. Kentucky regulations and policy statements are in compliance with current federal law.

### **Proposed Goals and Outcomes of Waiver**

The Commonwealth firmly believes that, if granted, this waiver will greatly improve the quality and selection of training available to our customers.

- Greater utilization of the ETPL by individuals pursuing training in Kentucky related to high demand jobs in targeted sectors.
- Better overall performance outcomes, including obtained employments, for individuals pursuing training via ITAs.
- Increased usage and success of cohort and/or customized training to improve relationship between training received and high-growth job in a targeted sector thereby increasing “consumer choice”.
- Enhanced ability of local boards to respond quickly and efficiently to immediate local job seeker and employer needs.
- More training providers will likely lead to greater choice, increased competition, and lower cost options.

### **Individuals Impacted by the Waiver**

Individuals who:

- access WIOA training services at one of the Commonwealth’s Kentucky Career Centers via individual training account (ITA),
- Trade Adjustment Assistance (TAA) or other federal funds,
- KCC partners and staff,
- subcontracted service provider staff, and
- training providers will benefit from this waiver.

### **Monitoring Progress and Implementation**

Annual WIOA on-site programmatic reviews will include an evaluation on adherence to state and federal policies, as well as how waivers are impacting local programs to ensure programmatic goals and outcomes are being met.

State staff involved with the administration of the ETPL and performance reporting will periodically examine the appropriateness and the effectiveness of this waiver. This strategy ensures that the goals described above, as well as those outlined in the State’s Unified Plan, are consistent with established objectives of the WIOA and federal and state regulations.

### **Notice to Local Boards and Public Comment**

In accordance with the WIOA Regulations at 20 CFR 676.135, Kentucky is submitting its Unified State Plan by April 1, 2020, which is subject to the requirements outlined in the WIOA Regulations at 20 CFR 676.130(d) for public review and comment. As such, Kentucky’s waiver is has been posted on our website for comment and review by required parties and the general public.

A copy of this waiver request was provided to all local workforce development boards and their associations. Any comment received will be forwarded to the USDOL and included as a modification to the state’s Unified Plan. Further, the impact of this waiver on the state’s performance will be addressed in the State’s WIOA Annual Report.

## **Supplemental Information for the Requested Waiver**

1. **The State must show evidence that the State met its goals (performance results) for its last waiver approval as well as the following:** For program year 2018, Kentucky's performance results were as follows:

### **Overall State Indication Scores:**

Employment Rate (Q2): 109%

Employment Rate (Q4): 107%

Median Earnings: 96%

Credential Attainment: 120%

### **Overall State Program Scores:**

Adult: 118%

Dislocated Workers: 123%

Youth: 98%

a. **Evidence the ETP data collection and reporting requirements are limiting choice (not enough providers).** Currently, the ETP contains more than 1,000 listings, but a close examination of those records reveals that certain sectors occur more often on the list; and within those sectors, geographic disparity exists. For example, in the past six months, 22 programs within the Healthcare sector have been added to the ETP. That is more than any other sector. While that is encouraging at first glance, the programs tend to represent geographic locations that lie within our most populous cities and counties. More Healthcare training programs are needed in our less populated areas so that more choices are available to participants. Another sector that needs focus during this time of waiver is Information Technology (IT). While we see some growth in IT programs, they are primarily in those same high-population areas. This pandemic illustrates that technology has forever changed how we address even our most basic of needs, including education and training. This waiver should afford time to work with providers to develop more programs in more locations and to consider the development of online and hybrid programs.

b. **Discuss how the State intends to use all student data for the purposes of continued provider eligibility.** Programs will be evaluated on a biannual basis to determine subsequent eligibility based on student performance data. In order to remain on the list, providers must maintain a completion rate of 20% and an employment rate of 50% with the entered employment being specifically tied to the training program the student completed.

c. **Discuss any special circumstances – especially those which would benefit WIOA priority populations, (example: such inclusion of tribal community colleges/providers on the ETP like South Dakota did)** The current pandemic has brought to light again that rural citizens of Kentucky continue to struggle with access to digital services. While institutions of higher education have assisted in bringing better and wider delivery of digital services to rural areas, certain pockets of the state have little to no access. For this circumstance, participants need access to local options that present little to no transportation obstacle, which is another long-standing concern for some of these locales. Access to local options is also an obstacle for many in our urban areas, but for different reasons. Urban areas typically offer reliable digital

access, but the cost for that access--and the cost to enter training programs that depend on reliable access--is sometimes too expensive for potential participants. In this circumstance, participants need as much a variety of programs as do their rural counterparts. In both cases, DWI staff and providers need to be cognizant of the need to develop and offer programs that assist participants in making an informed decision. Thus, this circumstance, too, depends on an awareness of which sectors are realistic options for the locale's participants. This waiver would allow time for renewed staff training on this awareness.

**d. Their plan for improving data collection so as to not need the waiver in the future (per TEGL 8-19)** KY Stats, Kentucky's Center for Statistics, assists with the collection and analysis of data. Recent reporting efforts with KY Stats staff reveal that certain fields within the current ETP application need to be better defined or expanded. Discussions have already begun on how this can be addressed as programming for a new Case Management System (CMS) begins.

**e. As a renewal - Evidence or discussion of how the waiver improves consumer choice (such as how many providers the state was able to add to the list because of the waiver)** In the midst of this pandemic, providers (some already listed on the ETP; some newly inquiring about being added to it) are asking DWI staff how they can best prepare to meet training needs post-pandemic. While much is unknown about how society will function post-pandemic, this waiver would allow time to address the ETP concerns raised in the above paragraphs as well as concerns yet to be raised. Although it is nearly impossible to estimate an exact number of new providers, this coming year will afford the opportunity to encourage many to join the ETP.

#### TITLE I-B ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient;	Yes
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist;	Yes
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	No
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes

The State Plan must include	Include
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

#### ADULT PROGRAM PERFORMANCE INDICATORS

#### Performance Goals for the Core Programs

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);

- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the 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.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	68.0	68.0	69.0	69.0
Employment (Fourth Quarter After Exit)	66.0	66.0	69.0	69.0
Median Earnings (Second Quarter After Exit)	5,400.0	5,400.00	5,700.0	5,700.00
Credential Attainment Rate	54.0	54.0	57.0	57.0
Measurable Skill Gains	50.0	50.0	55.0	55.0
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

#### DISLOCATED PROGRAM PERFORMANCE INDICATORS

##### **Performance Goals for the Core Programs**

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);



- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the

core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the 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.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	72.0	72.0	73.0	73.0
Employment (Fourth Quarter After Exit)	70.0	70.0	72.0	72.0
Median Earnings (Second Quarter After Exit)	7,000.0	7,000.0	7,200.0	7,200.00
Credential Attainment Rate	61.0	61.0	63.0	63.0
Measurable Skill Gains	50.0	50.0	55.0	55.0
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

#### YOUTH PROGRAM PERFORMANCE INDICATORS

##### **Performance Goals for the Core Programs**

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers

indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the 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.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	62.0	62.0	66.0	66.0
Employment (Fourth Quarter After Exit)	67.0	67.0	69.0	69.0
Median Earnings (Second Quarter After Exit)	3,000.0	3,000.00	3,700.	3,700.00
Credential Attainment Rate	50.0	50.0	55.0	55.0
Measurable Skill Gains	50.0	50.0	55.0	55.0
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

### 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 STAFF

1. DESCRIBE HOW THE STATE WILL STAFF THE PROVISION OF LABOR EXCHANGE SERVICES UNDER THE WAGNER-PEYSER ACT, SUCH AS THROUGH STATE EMPLOYEES, INCLUDING BUT NOT LIMITED TO STATE MERIT STAFF EMPLOYEES, STAFF OF A SUBRECIPIENT, OR SOME COMBINATION THEREOF.

The Commonwealth of Kentucky, Career Development Office currently staffs the provision of labor exchange services with merit staffing as well as Federally Funded Time Limited staff. It is the goal of the Career Development Office that future staffing will occur with subrecipient staff

as we develop and implement a plan to outsource Wagner-Peyser services to the Local Workforce Development Areas. As a result, the Commonwealth wishes to implement the flexibility of the *Wagner-Peyser Act Staffing Flexibility* final rule after July 1, 2020 and will submit the pertinent State Plan Modification once approved, which will include an implementation strategy for same.

2. 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 group of separate 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.

*Kee Suite*

Kee Suite is the complete case management system for Workforce Case Managers to manage work requirements for citizens looking to meet their SNAP/Medicaid requirements and for job seekers looking for help with services and career guidance.

Citizen Connect - Citizens reports work requirement activities, citizens may complete tasks, takes tests, complete registration, and have full access to their information

Business Connect – Business partners post opportunities for WIOA citizens and citizens receiving Medicaid to fulfill PATH requirements. Training providers post Offerings and enroll citizens in WIOA training.

Staff Connect - Staff register citizens, conduct assessments, determine WIOA eligibility, create employment plans, manage a citizen's case, and add services to citizen's profile.

*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. 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.

*Reemployment Services and Eligibility Assessments (RESEA)*

The Reemployment Services and Eligibility Assessments (RESEA) program is a grant program for states to assist individuals receiving unemployment insurance (UI) benefits.

The UI program is a required partner in the broader public workforce system and provides unemployment benefits to individuals who have lost their employment through no fault of their own and who otherwise meet initial and continuing UI eligibility requirements. Beginning in 2005, the U.S. Department of Labor, Employment and Training Administration funded the voluntary UI REA program to address individual reemployment needs of UI claimants, as well as prevent and detect improper benefit payments. In 2015, the Reemployment Services and

Eligibility Assessment RESEA program replaced the REA program providing greater access to reemployment services in addition to services previously provided under the REA program.

In FY 2018, amendments to the Social Security Act permanently authorized the RESEA program and implemented several significant changes including formula-based funding and a series of requirements intended to increase the use and availability of evidence-based reemployment interventions and strategies. The permanent RESEA program has four purposes:

1. Reduce UI duration through improved employment outcomes;
2. Strengthen UI program integrity;
3. Promote alignment with the vision of the Workforce Innovation and Opportunity Act (WIOA); and
4. Establish RESEA as an entry point to other workforce system partners.

Kentucky Career Center hubs conduct a weekly Kentucky Career Center orientation (KCCO). RESEA participants are required to attend these orientation. Kentucky Career Center partners work together in collaboration presenting the career center respective portfolio of products and service offerings. In addition, these orientations are open to all customers who have an interest in hearing/learning about career center services.

#### *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 EWDC'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.

From Unemployment Insurance's (UI) perspective, as people begin utilizing career centers for UI assistance, while they are in the building the staff can direct them to other employment services offered by the state. The plan involving increasing foot traffic in career centers is discussed in greater detail below.

**3. 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**

UI and Workforce Employment Services both are under the umbrella of the Department of Workforce Investment. Professional staff members in each area communicate as needed and coordinate any UI law, program or service changes. Kentucky Career Center staff primary focus is assisting job seekers re: job search and potential training opportunities. Customers can utilize the career center for filing UI claims and/or requesting UI benefit checks; however, they are required to contact the call center in Frankfort re: any questions and/or concerns re: their UI claim. 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.

Importantly, UI is currently reallocating staff resources to address some problem areas. Specifically, the claim processing times and our assistance line wait times. As part of this UI is now placing local field staff in hubs around the state to assist people with filing UI claims. Part of this effort includes working with the local staff and training them in identifying UI issues or problems in the applications. Many of the claims that need to be adjudicated result from individuals who do not fully understand how to complete the application. By placing staff in local offices where they can work directly with claimants, we believe we will decrease mistakes which will decrease claim processing times and result in more timely payment of benefits.

Regarding the decision to place Unemployment Insurance staff back into the Kentucky Career Centers, this decision was grounded in the fact that many of the customers coming into the Career Centers required hands-on assistance with filing for unemployment or requested information regarding their unemployment claims, and it became clear that the Commonwealth needed dedicated staff at the Career Centers to provide assistance with Unemployment Insurance issues. In addition, this change allows the customer to receive the full gamut of services that are provided at the Career Centers, and staff can easily direct customers to other employment services offered by the Commonwealth. The Local Workforce Development Areas have begun a cross training initiative across all programs and staff to ensure that everyone has the basic knowledge of each program in order to assist and refer the customer when necessary.

**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.

Each Hub has dedicated phone lines located in the lobbies that directly dial the Unemployment Insurance Call center in order for claimants to receive direct contact with customer service representatives that can assist with issues, provide answers, or refer to additional services. The

Call center is also equipped to assist Spanish speaking customers as well as hearing-impaired customers.

There is also the option on the website for customers to email their issues or questions about their claims directly to customer service representatives with UI services.

As mentioned above, the UI office is now engaged in a multi-step rollout to increase UI trained staff in career centers. Under this new plan individuals will now be able to walk into a career center and received assistance in completing UI applications, and they are able to ask questions about the status of the claims. Additionally, the UI office intends to increase over time, the number of staff dedicated to assisting in UI claims. The initial roll out starts with dedicating 12 staff members to UI claims in career centers. It is our hope that as people find out that career centers can now assist in filling out application and answering questions, the foot traffic in the career centers will significantly increase. Additional staff will be added in phases over time depending on volume. The state is also identifying local and regional offices that are not "one-stop-shops" that could benefit from UI services, and additional staff will be allocated as needed.

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

As we place UI staff in career centers we anticipate an increase in foot traffic through the career centers. When people come in for UI assistance we are then better able to direct them other employment resources offered by the state. As discussed above, UI services were not previously offered in career centers. Offering UI services will drive foot traffic into career centers thereby increasing career centers ability to offer additional services.

#### 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 WP staff. Kentucky is currently exploring options to allow LWDAs to procure Wagner-Peyser services for their career centers going forward.

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 Focus Assist and Kee Suite 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.

\*RESEA selects UI claimants identified as likely to exhaust their UI prior to gaining employment. These identified individuals are required to attend an in-person workshop at the Hub at approximately their 4th week of filing for UI benefits. This connects the individuals with Wagner Peyser staff at the center and allows them to receive more intensive reemployment services. The staff work with the individuals on ensuring they have a searchable resume, complete an assessment, provide labor market information, and refer to employment or other services.



## 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.

\*When claimants file their claim through the online system they are automatically pre-registered in the Focus Career website. The customers will be prompted to complete the full registration in Focus at the end of the filing process. This requires customers to either create or upload a resume to their account.

## 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 are completed electronically during their bi-weekly payment request 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 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 and Skills U 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 jobseekers.

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 AN ASSESSMENT OF NEED. AN ASSESSMENT NEED DESCRIBES 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.

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 Commonwealth 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 12 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.

2. 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. The months of increased agricultural activity in Kentucky are from July-December, and the geographic areas for prime activity are mainly in the Central and Western regions.

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.

3. 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

During the peak seasons, Kentucky has approximately 9,000 Visa workers, 20,000 seasonal workers, and approximately 10,000 migrant workers. During the low season, there are approximately 1,500 Visa workers, 2,500 seasonal workers and approximately 2,500 migrant workers. Mexico is the predominate country of origin of the MSFW in Kentucky, and most of these workers speak Spanish. Staff members provide outreach to MSFWs at various KCC offices across the state.

#### 4. 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:

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.

##### 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.

Kentucky Career Centers also provide 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, which allows employers to search online for qualified candidates.

B. PROVIDING TECHNICAL ASSISTANCE TO OUTREACH STAFF. 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 AND EMPLOYMENT-RELATED LAW COMPLAINT SYSTEM ("COMPLAINT SYSTEM" DESCRIBED AT 20 CFR 658 SUBPART E), 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.

All outreach staff are included in trainings provided by the Career Development Office as well as the Department of Workforce Investment. In addition, staff register to attend webinars on Workforce GPS. They are provided any technical assistance needed. Training modules and tools are provided by the National Monitoring Advocate Team.

### 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.

All staff are included in trainings provided by the Career Development Office as well as the Department of Workforce Investment. In addition, staff register to attend webinars on Workforce GPS. They are provided any technical assistance needed.

### 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.

All staff are included in trainings provided by the Career Development Office as well as the Department of Workforce Investment. In addition, staff register to attend webinars on Workforce GPS. They are provided any technical assistance needed.

### 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 fulltime 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.

KCC services are available to all MSFW participants, including vocational rehabilitation; blind services; employment and basic 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.

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

Describe the State agency's proposed strategies for:

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

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

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

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 which 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 FOR U.S. WORKERS (ARS) 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.

## 6. 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.

No comments were received regarding the AOP as part of the public comment period for this State Plan.

### C. DATA ASSESSMENT

Review the previous four years Wagner-Peyser data reports on performance. Note whether the State has been meeting its goals to provide MSFWs quantitatively proportionate services as compared to non-MSFWs. If it has not met these goals, explain why the State believes such goals were not met and how the State intends to improve its provision of services in order to meet such goals.

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. Kentucky continues to work towards better integrity of its data to ensure the accuracy.

Kentucky continues to work towards better integrity of its data to ensure the accuracy.

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.

Again, 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.

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:

The State Plan must include	Include
1. The Wagner-Peyser Act 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. If the State has significant MSFW one-stop centers, the State agency is complying with the requirements under 20 CFR 653.111, State Workforce Agency staffing requirements;	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 Act services, Adult and Dislocated Worker programs and Youth Programs under Title I; and	Yes
4. SWA officials: 1) Initiate the discontinuation of services; 2) Make the determination that services need to be discontinued; 3) Make the determination to reinstate services after the services have been discontinued; 4) Approve corrective action plans; 5) Approve the removal of an employer’s clearance orders from interstate or intrastate clearance if the employer was granted conditional access to ARS and did not come into compliance within 5 calendar days; 6) Enter into agreements with State and Federal enforcement agencies for enforcement-agency staff to conduct field checks on the SWAs’ behalf (if the SWA so chooses); and 7) Decide whether to consent to the withdrawal of complaints if a party who requested a hearing wishes to withdraw its request for hearing in writing before the hearing.	Yes

WAGNER PEYSER PROGRAM PERFORMANCE INDICATORS

## **Performance Goals for the Core Programs**

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:



- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the 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.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	55.0	55.0	58.0	58.0
Employment (Fourth Quarter After Exit)	60.0	60.0	63.0	63.0
Median Earnings (Second Quarter After Exit)	5,400	5,400.00	5,500	5,500.00
Credential Attainment Rate	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Measurable Skill Gains	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

## 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 and activities under title II of WIOA, the Adult Education and Family Literacy Act (AEFLA).

### A. ALIGNING OF CONTENT STANDARDS

Describe how the eligible agency has aligned 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 Common Core State Standards developed by National Governors Association (NGA), Council of Chief State School at all educational levels (P-12), postsecondary and adult education. KYSU 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 decades) to pursue postsecondary education and training, as well as career aspirations.

KYSU’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 (HSE) Diploma. Together, these provide KYSU’s students the same opportunities for college and career readiness as graduating high school seniors.

Consequently, KYSU is part of an effort to create a seamless system for students to move from adult education to earning their GED®/HSE diplomas and then, subsequently, 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, KYSU employs comprehensive, job-embedded, and intense professional learning (PL) (using professional learning communities [PLCs] and offering professional growth electives) that encapsulates standard-based andragogy, academic content, contextualization of instruction, digital literacy integration (e.g., EdReady), effective instructional strategies, and instructional leadership. KYSU PL offerings are available via face-to-face, online, and blended formats.

KYSU continues its partnerships with the Adult Education Academy at Morehead State University to provide instructional leadership and assistance to instructors focusing on Reasoning through Language Arts and Mathematics, and the National Center for Families Learning (NCFL) to provide curricula development and facilitation of online courses, including English Language Acquisition (ELA). Both partners are integral to the development and execution of professional learning communities targeting innovative practices.

KYSU continues to develop standard-based tools to assist instructors with aligning academic and workforce preparation instruction. An Instructional Framework Series was designed in FY18-19 to provide a common instructional foundation for all of Kentucky's adult education providers. Local adult educators (who successfully aligned instruction with College and Career Readiness Standards [CCRS], student assessment criteria, and program performance metrics) provided the impetus for this project. Building upon local providers' input, a state-level team designed the series to align all instruction statewide with the Literacy Information and Communication System (LINCS) Professional Development Center Self-Assessment Tool, the LINCS Adult Education Teacher Competencies, the Data Recognition Corporation Test of Adult Basic Education (TABE) 11/12 Blueprints (based on the College and Career Readiness Standards), and the GED® High Impact Indicators.

The Mathematics and Reasoning through Language Arts (RLA) Frameworks were constructed to provide uniformity and ease of use. A CCRS Key was placed in the framework's introduction to assist users in understanding standards abbreviations; color-coding was used to signify the type and percentage of standards-based content at each TABE Level; and a horizontal crosswalk was used to illustrate specific CCRS applications aligned with specific hyperlinked instructional resources.

The English Language Proficiency (ELP) Instructional Framework was developed in FY 18-19 to continue the same uniformity and ease of use associated with the Mathematics and RLA Frameworks. The resources in the ELP Standards (ELPS) Instructional Framework were organized in two ways. First, each ELP Standard was listed with level descriptors, aligned competencies, and resources. Second, resources were listed by proficiency level. The ELPS Framework was based on the five proficiency levels identified in the LINCS ELPS for Adult Education. As with the previous frameworks, the ELPS Framework was designed to ensure conformity in standards-based instruction.

Standard-based instruction continues to be supported and improved through development and sharing of resources and tools, sharing of best practices, and input and feedback from the field.

KYSU plans to continue to align professional learning, tools, and resources to the LINCS repository resources. Additionally, KYSU has committed to adopting more and various instructional technologies to accommodate the needs of students. An instructional technology senior associate has conducted statewide Google Classroom trainings and has been tasked with examining the use of instructional technology currently, determining the best courses of action forward, and analyzing gaps in instructor competencies. An Instructional Technology Framework predicated on LINCS adult education teacher competencies has also been shared with educators. Comprised of detailed screenshots and video tutorials, the framework represents another avenue by which to engage students.

## B. LOCAL ACTIVITIES

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide 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.

**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.

- Competitive process Section III(b)5.B.(i)]: During grant year 2020-21, KYSU will develop a new competitive application process for federal AEFLA funding to determine the eligible providers that will be awarded funds starting July 1, 2021. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate the applicants' ability to produce measurable skill gains and other defined metrics. Through this process, KYSU will identify, assess, and award multi-year grants 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 Section III(b)5.B.(ii)]: All KYSU RFAs 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 RFAs 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 in 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.]

The RFA will underscore criteria for individual eligibility of adult education services, which includes:

- 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:
  - Basic-skills-deficient;
  - Lacking a secondary school diploma or its recognized equivalent, and have not achieved an equivalent level of education; or
  - 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:*

○ Standards-based 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:*

○ 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:*

○ 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 (IELCE):*

○ 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

\*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.

*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

*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

*Workforce Preparation:*

KYSU 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 [WIN]) purchased with KYSU's and DWI's incentive funds, students, while in a program of study, may earn a governor-endorsed Kentucky Essential Skills Certificate (KESC). The KESC is achieved through formative and summative assessments. Once students have passed the four WIN workforce preparation courseware modules (Conveying Professionalism, Communication, Critical-Thinking, and Collaboration) they are eligible to take a proctored summative assessment, which, upon passing, qualifies them to receive a KESC. Consequently, with all programs contextualizing standards-based, academic instruction, they need only to add training (occupational) partner activities, using common learning objectives and aligned curricula, to extend their efforts to implement Integrated Education and

Training models and/or provide adult education support within more expansive career pathways programs. The state further benefits from the WIN courseware's purchase because, along with workforce preparation, additional courseware pathways include: career readiness certification test preparation and college and career readiness standards instruction.

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 Kentucky College Readiness Certificate and/or high school equivalency diploma. Therefore, currently, programs are equipped to provide workforce preparation activities.

*Integrated Education and Training (IET):*

With the advent of the Work Ready Kentucky Scholarship (WRKS) and subsequent initiation of various eligible co-enrollment models, e.g., career pathways that are eligible for Ability to Benefit (AtB) financial aid and other non-AtB eligible and/or abbreviated pathways, partners agreed to launch one overarching initiative to capture all co-enrollment programs targeting adults – GED® +Plus. The student outcome goal remains the same; earn a GED®/HSE diploma and, at a minimum, one industry-recognized credential in a sector supported by the Work Ready Kentucky Scholarship.

KYSU collaborated with KCTCS to create a new program called “GED®+Plus”. The GED®+Plus program creates an accelerated option for providing education and training for adult learners through an integrated pathway model that allows students to learn academic and occupational skills at the same time. The GED®+Plus program targets working age adults who do not have a high school diploma or its equivalent. The program co-enrolls participants seeking a high school equivalency (HSE)/GED® diploma in a KYSU program and in one of the state's top five industry sectors, allowing participants to earn both a HSE/GED diploma and a short-term (i.e., one 16-week semester or less) certificate. GED®+Plus participants qualify for scholarships through the WRKS initiative to pay for their tuition in college classes. Skills U has 27 local providers who collaborate with the 16 KCTCS colleges to offer programs designed to meet labor market needs and increase credential attainment for adults. KYSU leadership meets quarterly with KCTCS to discuss marketing strategies, enrollment trends, and student success outcomes for GED®+Plus participants.

- New Language
- The Commonwealth initiated a Work Ready Kentucky Scholarship by Governor's Executive Order that is dedicated to funding tuition for up to 60 credit hours of occupational training services, including 350 programs, in Kentucky's in-demand sectors: advanced manufacturing, informational technology and business, healthcare, transportation and logistics, and construction trades. It also provides up to \$400 for “mandatory fees” associated with occupational training service costs. HSE/GED®-seeking students are eligible for this scholarship. Sixteen colleges and more than 70 campuses may extend GED+Plus

offerings. (These funds are not AEFLA, Title II funds.)

While the WRKS provides \$400 per year for mandatory fees, students frequently find occupational training service cost requirements, e.g., books, supplies, equipment, etc., prohibitive. Therefore, for the first semester of GED®+Plus, KYSU committed to contributing to the occupational instructional training service costs in excess of mandatory fees. Additionally, Kentucky Community and Technical College System consigned \$400 for the first 1,000 enrollees. Both partners are advocating for workforce partners to consider committing funding toward required occupational training service cost requirements as well as tuition. KYSU plans to offer several defined time periods in which the GED® testing fees will be waived. These measures will assist in removing barriers to enable students to remain co-enrolled and accelerate earning a HSE/GED® diploma and occupational credential.

○

In addition to GED+Plus, KYSU continues to explore ways in which to partner with alternative organizations from the community and technical colleges (e.g., YouthBuild’s construction training) to offer core adult education services concurrently with occupational skills training. While these services may not include all the wraparound support services as a fully articulated career pathway program, defined in WIOA Section 3 (Def. 7), they provide an opportunity for adult education providers to partner with training organizations to accelerate student learning by attaining adult education contextualized academic support and aligned occupational skills training simultaneously.

KYSU plans to provide intensive technical assistance to providers more frequently to ensure IET programming adheres to common learning outcomes and integrated academic education and occupational skills training. Additionally, the KYSU strategic partnerships unit has already forge relationships with local workforce innovation boards (LWIB) and Kentucky Career Centers to offer students opportunities to engage in work-based learning activities leading to potential job placements with community employers.

KYSU wants to grow and expand the concept of IET in Kentucky beyond GED®+Plus 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.

### 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.

- Competitive process Section III(b)5.B.(i)]: During grant year 2020-21, KYSU will develop a new competitive application process for federal AEFLA funding to determine the eligible providers that will be awarded funds starting July 1, 2021. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate the applicants' ability to produce measurable skill gains and other defined metrics. Through this process, KYSU will identify, assess, and award multi-year grants 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 Section III(b)5.B.(ii)]: All KYSU RFAs 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 RFAs 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 in 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.]

With the reauthorization of WIOA, the RFA process included and 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 GED®/HSE;
- Appropriate instructional accommodations for inmates identified with learning differences/disabilities;
- Workforce preparation activities as defined above; and
- Transition coaching and CCR-standards-based instruction.

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.

KYSU approaches corrections educational services through increasing educational levels and equipping inmates 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.

#### *Local Corrections Education*

In local areas where full-service jails exist, adult education providers are required to partner with their local jailer to offer incarcerated adults contextualized (workforce preparation skills), standards-based academic instruction (a minimum of 10 hours of instruction per week is recommended, however, discretion is given to the adult education program director to determine if less than 10 hours of instruction per week is sufficient time to advance students). Local providers serve in 69 jails. It is 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.

#### *State Correctional Institutions*

Historically, the DOC employed KCTCS instructors to provide educational services in the 12 state correctional institutions. Currently, instructors are directly employed by the 12 institutions and primarily provide instruction during daytime hours. Four counties within four regional service areas serve inmates at five state institutions, primarily during evening hours. Correctional adult education students must meet the same eligibility criteria as any other adult student as described above.

While KYSU understands the value of other services, including integrated education and training, career pathways, concurrent enrollment, and peer tutoring; KYSU services focus on adult education and literacy activities, including preparation for earning a GED®/HSE diploma and preparation for incarcerated adults to transition with employability/essential skills. However, KYSU appreciates the benefits an accelerated

co-enrollment program may have for inmates and have initiated preliminary discussions around the GED®+Plus model. While inmates may currently have an opportunity to avail themselves of vocational/occupation skills training, they most often must pursue these offerings subsequent to earning their GED®/HSE. A co-enrollment program may permit inmates, especially those nearest release, to accelerate the process of earning both a GED®/HSE diploma and industry-recognized technical/occupational credential. Additionally, where situationally feasible, instruction may include peer tutoring.

As re-entry services for ex-offenders has become a priority for DOC, KYSU has been diligent in identifying ways to recruit incarcerated individuals and re-entering ex-offenders without a GED®/ HSE diploma. KYSU partnered with DOC re-entry services to establish a referral system through probation and parole officers. Local program directors and regional probation and parole officers were invited to a joint “kickoff” event where they introduced themselves and were provided planning time to determine locally effective processes. In general, when ex-offenders are released and/or are required to meet with probation officers, they are given local adult education contact information and a referral to seek services. The probation officer also alerts the adult education provider through email and provides the individual’s contact information. The provider is obligated to contact the ex-offender up to three times within a 30-day period. If the ex-offender does not seek adult education services, the adult education provider alerts the probation officer for further follow-up.

While these steps have increased referrals, not all referrals seek services and of those who do seek services, they are plagued with insufficient hours of study to attain educational advancements. Therefore, KYSU continues to work closely with DOC to modify and refine the referral process to ensure better outcomes.

Our ultimate goal in partnering with DOC is to ensure all incarcerated individuals without a high school diploma or its equivalent earn a HSE credential – preferably prior to release. If a credential is not earned prior to release, partners need to make inmates aware of services at local learning centers upon their release. The potential impact on recidivism rates could be significant.

Unfortunately, Kentucky is a leading state in the opioid addiction epidemic. However, KYSU has connected with recovery programs through Strategic Partnership Coordinators (SPCs). Because recovery residents may be subject to restrictions to remain on campus and often do not possess a high school diploma or its equivalent, local KYSU providers are realizing efficiencies by serving cohorts of recovering clients on campus versus in-center instruction. (See also State Leadership, Alignment).

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

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, including how 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.

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.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to 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.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to integrate with the local workforce development system and its functions to carry out the activities of the program.

Adult ELLs, 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.

Priorities for the Commonwealth focus on increasing ELLs' abilities to read, write, speak, and comprehend English, in addition to building mathematical skills through 231 funding. Academic instruction is supported by adult education College and Career Readiness (including ELP standards) standards-based instruction in an effort to retain and transition ELL students into adult education (Literacy, ABE, ASE).

Programs' short-term, educational goals for ELLs 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 is facilitated by these instructional enhancements; advancing into adult education instruction will appear seamless to the student.

As ELLs anticipate transitioning to adult basic education, they set longer-term goals of earning a GED® diploma and transitioning 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.

As a result of the Request for Application released in spring 2018, three counties applied for and were awarded Section 243 funding. In FY18-19, KYSU served 497 IELCE English language learners (ELLs) and attained 279 measurable skills gains in the following three Kentucky counties: Fayette, Jefferson, and Warren.

For eligible IELCE applicants of the RFA, the service area for which they were applying for core services funds must have met a minimum of 2,000 ELLs. Applicants were required to submit separate forms describing the program's plan of service and indicate how resources would be allocated in the budget and budget narrative. The eligible applicants were required to provide the three (3) most recent fiscal years' data indicating the ELL total population, number of ELLs enrolled the previous three (3) years, and the projected number of ELL enrollments.

KYSU reinforced communication of IELCE requirements in the RFA. Eligible applicants were asked to describe the student experience, including recruitment, intake and orientation; program design, classes, curriculum, and use of technology; roles and responsibilities of staff and partner service providers; education services, including literacy and ELA and integrated instruction on rights and responsibilities of citizenship and civics participation; student transition from ELA to ABE and integrated education and training opportunities and employment outcomes; standards-based instruction, including workforce preparation, earning a KESC, sector occupational contextualizing, co-enrollment workforce training and placement opportunities; in-demand sector pathway, why it was selected, and who would provide workforce training; recognized credential associated with occupational training or student's educational and/or career advancement; employer investment; and the process for workforce partners to place students into unsubsidized employment. As a result of effective monitoring practices, KYSU has realized that not all IELCE program components are fully integrated in the three programs funded as a result of the spring 2018 grant competition. Three intensive program director informational and technical assistance (TA) sessions have been hosted by KYSU. Subsequently, the three programs have been asked to submit a plan detailing (in cases where appropriate) improvements in their programs' designs. These plans will be used to continue to monitor progress and inform future RFA parameters for program design success.

KYSU's purchase of Burlington English positively contributes to IELCE participants' blended instructional experience, civics education, and career exploration. The courseware is CASAS-aligned and provides academic instruction for ELL students. Of particular interest is its inclusion of soft skills, career exploration courses, and comprehensive technical/professional learning support services.

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.

- Competitive process Section III(b)5.B.(i)]: During grant year 2020-21, KYSU will develop a new competitive application process for federal AEFLA funding to determine the eligible providers that will be awarded funds starting July 1, 2021. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate the applicants' ability to produce measurable skill gains and other defined metrics. Through this process, KYSU will identify, assess, and award multi-year grants 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 Section III(b)5.B.(ii)]: All KYSU RFAs 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 RFAs 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 in 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.]

Following the RFA competition and based on the Census Bureau's American Community Survey (ACS), 5-year estimate (2013-17) of Ability to Speak English, KYSU funded three IELCE providers – Bluegrass Community and Technical College (BCTC), Jefferson Board of Education, and Southcentral Kentucky Community and Technical College (SKYCTC).

As a result of Kentucky Skills U's (KYSU/Skills U) spring 2018 Request for Application's (RFA) emphasis on regional service areas, there are 27 local fiscal agents across the state. Three of these fiscal agents applied for and were awarded Section 243 Integrated Education Literacy and Civics Education (IELCE) grant funding. Skills U recognized that with the reauthorization of the Workforce Innovation and Opportunity Act (WIOA), the IELCE program was a significant departure from prior English Literacy and Civics grant's programming. Therefore, the Program Administration and Accountability (PPA) team, using Office of Career, Technical, and Adult Education (OCTAE) resources, conducted technical assistance sessions specifically targeting IELCE program and Integrated Education and Training (IET) models, which included step-by-step law, regulation, and policy reviews, as well as participant interaction using scenarios and discussion to facilitate providers' understanding and recognition of programming components.

During 2019-20, the PPA team conducted a thorough evaluation of the three local Skills U IELCE programs. Consequently, it became apparent there was not a common understanding of how best to implement the IELCE program.

One provider's fiscal agent had instituted an organization-wide restructuring, including hiring a new program director. With this restructuring, institutional knowledge of IELCE program implementation was lost. However, the new program director is eager to serve students in innovative ways, has gratefully accepted TA, and acknowledges it will take time to mobilize improvements in the program. A second provider did not have a clear understanding of IELCE's integration and assimilation goals. The third provider's IELCE program served as an example of appropriate integration and implementation of English Language Acquisition, workforce preparation, civics and citizenship preparation, and access to occupational sector co-enrollment opportunities. Additionally, the provider recognizes the importance of retaining English Language Learners (ELLs) to transition them to Adult Basic/Secondary Education and facilitate the goals of attaining a high school equivalency and technical credential through KY's GED®+Plus program.

Therefore, the PAA team held an IELCE workshop with these three providers. Common agenda items for the workshop included:

Program updates (i.e., contact hour reports, level gains, GED attainment, transition to postsecondary/employment, etc.); Budget review; Program design (i.e., program offerings, partnerships, staffing, barriers to implementation, etc.); Effective implementation of workforce preparation and sector occupational contextualizing and co-enrollment in workforce training, and Recruitment and retention strategies.

After the workshop, the PAA team scheduled individual technical assistance trainings with each of the IELCE providers to address barriers to implementation, assist with program design and staffing needs, and provide other recommendations for improvement. The team used the following resources to guide the programmatic review: “Building Opportunities through Integrated English Literacy and Civics Education: IELCE Self-Assessment Too;” “Quick-Reference Guide to Using LINCS;” and Program Memorandums OCTAE/DAEL 15-7, 17-2 and 19-2.

Following the individual technical assistance sessions, each of the three local providers were required to submit a one-page proposal outlining their revised program design, program goals, curriculum and course syllabus, staffing allocations, partnerships to support workforce preparation and training needs, and any changes to their budget. Obviously, two providers had improvements that are more significant in their proposals than the third.

The PAA team conducts bi-monthly check-ins (January, March and May) to ensure strategies are being implemented and producing the desired outcomes. At fiscal year-end (2019-20), each IELCE provider will be required to submit a one-page narrative and evaluation logic model to show evidence of demonstrated effectiveness. The evaluation logic model will serve as a monitoring tool for the PAA team to assess performance outcomes, ensure compliance, address barriers to implementation, provide technical assistance, and identify key strategies and best practices to support IELCE programming.

Describe how the State is progressing towards program goals of preparing and placing IELCE program participants in unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency as described in section 243(c)(1) and discuss any performance results, challenges, and lessons learned from implementing those program goals;

IELCE program students have access to GED®+Plus, which is a co-enrollment integrated education and training program offered in partnership between Kentucky Community and Technical College System (KCTCS) and described below.

KYSU collaborated with KCTCS to create a new program called “GED®+Plus”. The GED®+Plus program creates an accelerated option for providing education and training for adult learners through an integrated pathway model that allows students to learn academic and occupational skills at the same time. The GED®+Plus program targets working age adults who do not have a high school diploma or its equivalent.

The program co-enrolls participants seeking a high school equivalency (HSE)/GED® diploma in a KYSU program and in one of the state’s top five industry sectors, allowing participants to earn both a HSE/GED® diploma and a short-term (i.e., one 16-week semester or less) certificate. GED®+Plus participants qualify for scholarships through the Work Ready Kentucky Scholarship (WRKS) initiative to pay for their tuition in college classes.

Skills U has 27 local providers who collaborate with the 16 KCTCS colleges to offer programs designed to meet labor market needs and increase credential attainment for adults. KYSU leadership meets quarterly with KCTCS to discuss marketing strategies, enrollment trends, and student success outcomes for GED®+Plus participants.

The Commonwealth initiated a WRKS that is dedicated to funding tuition for up to 60 credit hours of occupational training, including 350 programs, in Kentucky’s in-demand sectors: advanced manufacturing, informational technology and business, healthcare, transportation and logistics, and construction trades. It also provides an annual stipend of up to \$400 for

“mandatory fees”. HSE/GED®-seeking students are eligible for this scholarship. Sixteen colleges and more than 70 campuses may extend GED®+Plus offerings.

In addition to GED®+Plus, KYSU continues to explore ways in which to partner with alternative organizations from the community and technical colleges (e.g., YouthBuild’s construction training) to offer core adult education services concurrently with occupational skills training. While these services may not include all the wraparound support services as a fully articulated career pathway program, defined in WIOA Section 3 (Def. 7), they provide an opportunity for adult education providers to collaborate with training organizations to accelerate student learning by attaining adult education contextualized academic support and aligned occupational skills training simultaneously.

Additionally, the KYSU strategic partnerships unit has already forged relationships with local workforce innovation boards (LWIB) and Kentucky Career Centers to offer students opportunities to engage in work-based learning activities leading to potential job placements with community employers. (Response for below as well.)

KYSU wants to grow and expand the concept of IET in Kentucky beyond GED®+Plus 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.

Describe how the State is progressing towards program goals of ensuring that IELCE program activities are integrated with the local workforce development system and its functions as described in section 243(c)(2) and discuss any performance results, challenges, and lessons learned from implementing those program goals.

As part of the changes implemented as a result of WIOA reauthorization, KYSU established a new position, Strategic Partnership Coordinator (SPC). Five SPCs are located regionally (corresponding to Local Workforce Investment Boards [LWIBs] regions) and report to a director at the state level. Their charge is two-fold, connect and coordinate services and activities through Kentucky Career Centers (KCCs) and identify new and innovative opportunities to serve more students by liaising with and expanding local community partnerships.

While SPCs strategically recognize potential partnerships, they serve the providers, who ultimately decide if and how services may become available based on existing resources. The SPCs have already had successes collaborating with recovery centers (many recently established or extended due to the opioid crisis), where cohorts of individuals without a high school credential reside and the potential to provide adult education services exists. Services are frequently available on-site due to the restrictions placed on residents.

KYSU continually provides opportunities to connect local providers with local partners to enhance student access, support, and success. Each fiscal year, KYSU hosts collaborative trainings and workshops between local libraries, our LWIBs, and KCCs to encourage them to identify and implement innovative strategies to serve adult learners, support area certification processes and identify ways to improve the health of their communities’ workforce. Because of KYSU’s collaborative efforts with workforce, local and statewide partners, we are able to better integrate and streamline student support services.

Based on our Enrollment Source Report in KAERS, we receive roughly 321-386 referrals from employer, community agencies, and WIOA core partners per year (i.e, FY18 – 321, FY19 – 386,



FY20 – 327). With the use of available resources, technical assistance, bi-monthly monitoring, and offering additional trainings and workshops with our local partners, our IELCE providers will continue to help our state with identifying how to best align adult education activities with postsecondary, workforce, and local partner needs.

#### 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: On June 27, 2019, House Bill 392 went into effect, moving all WIOA partners under one common “umbrella” cabinet. There were other organizational realignments, ultimately resulting in the following agencies falling under the EWDC’s purview: Kentucky Department of Workforce Investment (DWI), Workforce Innovation Board (KWIB), Department of Libraries and Archives (KDLA), Center for Statistics (KYSTAT), Department of Education (KDOE), Commission on Proprietary Education, Educational Television (KET), Center for School Safety, Commission of the Deaf and Hard of Hearing, Governor’s Scholars Program, Unemployment Insurance Commission, Early Childhood Advisory Council, Governor’s School of Entrepreneurs, Office of Vocational Rehabilitation (OVR), Office of Career Development (CDO) [formerly Employment and Training], Employer and Apprenticeship Services, and KY Skills U. KYSU continues to forge and strengthen partnerships with WIOA and other partners, such as Kentucky Community and Technical College System (KCTCS), Kentucky Higher Education Assistance Authority (KHEAA), Department of Corrections, Career and Technical Education (CTE), Kentucky Cabinet for Health and Family Services (CHFS), and more.

Although KYSU had forged and nurtured partnerships with workforce partners, the reorganization has stimulated more opportunities to integrate services, including the following:

- Early Childhood - Head Start: KYSU, Early Childhood Advisory Council, and Kentucky Community Action (KCA) have met at the state level, but have also been acquainted on the local level, in an effort to create community awareness and align services. As a result, state agency and local service provider staff have become aware of viable services available to their clients. In particular, KYSU has recognized opportunities to partner with Head Start and Kentucky Community Action to deploy targeted referral processes and recruitment strategies. Examples of collaborative efforts include an invitation to present at Head Start’s Board of Directors meeting and KYCA’s annual conference, where local Head Start administrators and other community stakeholders were also in attendance.

Additionally, while Head Start had been paying for curricula, KYSU shared access to its Lesson Bank and Google Digital Skills curriculum with local Head Start educators. Head Start leadership plans to survey local providers about family needs and services and share this information with KYSU to streamline and focus partnership goals and objectives.

- Kentucky Department of Libraries and Archives (KDLA): KYSU has worked with KDLA in the past by encouraging local service providers to meet and share service information that can be communicated to their students/clients. In planning for FY19-20, KYSU introduced the idea of “connection points” as a measure to improve efficient use of resources. As a result of incorporating (in the prior spring’s Request for Application’s [RFA]), parameters to move local providers toward a more comprehensive regional service approach, fiscal agents applied for more counties of responsibility. Consequently, the previous year’s number of program directors declined from 63 to 27. Additionally, state policy development includes examining how service and connection

points to service could be available in all 120 counties and still accommodate for county adult education demand. Based on minimal demand and anemic enrollment, many small, rural counties do not warrant a full-service adult education center. By partnering with community organizations, adult education providers with greater in-demand services in other counties could still provide referrals, Career and College Navigator services, and access to computers and online courseware, connecting potential students to more robust center services more efficiently by establishing “connection points” with partners. Since libraries are often a prominent presence in most counties, they and other community organizations were targeted as apt partners to realize efficient use of services. By establishing connection points at the beginning of the program year, local providers are expected to evaluate and re-evaluate their appropriateness and modify for continued improvement of services. This year KYSU will monitor the strategy’s successes and challenges.

- Perkins Leadership Grant Funds: KYSU was awarded leadership funds to reinforce its College and Career Navigator (CCN) support. As part of the spring 2018 RFA, providers must employ at least one full-time CCN (with few exceptions) and add more CCN services (hires) as enrollment dictates.

The Perkins grant afforded KYSU the opportunity to hire a state level CCN coordinator. Considering this was a new position for the service providers, KYSU desired to provide the support necessary to assist students in navigating education and career advancements. The CCN Coordinator hosted three, face-to-face training sessions for local navigators. Additionally, activity logs were created to capture CCN activities in relation to student outcomes. CCNs assist students with completing a career pathway plan that is designed for students to set educational and workforce goals based on interests, workforce needs, post-secondary education and training requirements, etc. A major responsibility of the local CCN is to be aware of and refer students to support services (e.g., public assistance, community-based services, etc.) to remove barriers to educational pursuits. The Coordinator keeps the local CCNs connected through Google docs and classrooms – forums in which the Coordinator can share important communications and local CCNs can ask questions, share best practices, etc. CCNs will also be integral as the “face” of connection points, job fairs, and other awareness-inducing events.

- Kentucky Workforce Innovation Board (KWIB): KYSU leadership serves on two of the four KWIB committees – Workforce Participation and Sustainability and Education and Employer Engagement. The dashboard created by Kentucky Center for Statistics (KYSTATS), with the cooperation of individual agencies, is typically used to report out several metrics of interest for the KWIB, and one metric is adult education. KYSU shares KAERS data with KYSTATS to keep the dashboard up-to-date. The Board’s strategic plan will also guide the WIOA state plan.
  - WorkReady Communities: KYSU is a member of the Work Ready Communities review panel. The panel reviews proposals for certification, in-progress status, and recertification associated with WorkReady Community status. Kentucky’s counties are awarded the WorkReady Communities distinction based on meeting a set of criteria. The criteria most potentially affected by adult education include the percent of the working age population (18-64) without a high school diploma or its equivalent, the percent of working age adults with “some college” (as defined by the American Community Survey), and the number of adults who have earned essential skills and/or career readiness certificates.

- Work Ready Kentucky Scholarship: The Commonwealth’s WRKS is dedicated to funding tuition for up to 60 credit hours of occupational training, including 350 programs, in Kentucky’s in-demand sectors: advanced manufacturing, information technology and business, healthcare, transportation and logistics, and construction trades. It also provides an annual stipend of up to \$400 for “mandatory fees”. High-School-Equivalency- (HSE)/GED-seeking students are eligible for this scholarship. Sixteen colleges and more than 70 campuses extend GED+Plus offerings (a co-enrollment program more fully described in the One Stop Integration/RFA section). While the WRKS also provides \$400 per year for mandatory fees, students frequently find course-required book, supply, equipment, etc. costs prohibitive. Therefore, for the first semester of GED+Plus (see One-Stop Integration below for description), KYSU committed to contributing to the costs associated with these items. Additionally, Kentucky Community and Technical College System consigned \$400 for the first 1,000 enrollees. Both partners advocate for workforce partners to consider committing funding toward auxiliary course requirements as well as tuition. KYSU plans to offer several defined time periods in which the GED test fee will be waived. These measures will assist in removing barriers to students remaining co-enrolled and accelerate earning a HSE/GED diploma and occupational credential.
- Kentucky Cabinet for Health and Family Services (CHFS): Kentucky continued to anticipate the implementation of Kentucky’s Medicaid Waiver. The Deputy Executive Director (formerly Associate Vice President) represented KYSU on the Online Course and Learning Management System (LMS) committee. Representatives from various agencies review and approve proposed online courses for Medicaid recipients. By completing an approved course, Medicaid recipients are awarded banked “funds” that may be used for services, e.g., vision care, dental visits, etc. for themselves and family members. Although the courses are short in duration, the intent is to cultivate healthy and beneficial habits.
- Strategic Partnership Coordinators: Additionally, as part of the changes implemented as a result of WIOA reauthorization, KYSU established a new position, Strategic Partnership Coordinator (SPC). Five SPCs are located regionally (corresponding to LWIB regions) and report to a director at the state level. Their charge is two-fold connect and coordinate services and activities through Kentucky Career Centers (KCCs) and identify new and innovative opportunities to serve more students by liaising with and expanding local community partnerships.

While SPCs strategically recognize potential partnerships, they serve the providers, who ultimately decide if and how services may be available based on existing resources. The SPCs have already had successes collaborating with recovery centers (many recently established or extended as a result of the opioid crisis), where cohorts of individuals without a high school credential are identified and provided an opportunity to access adult education services. Services are frequently available on on-site due to the restrictions placed on residents.

Other partnerships that have initially been introduced at the state level and eventually culminated in local initiatives include a two-generation grant collaboration with the Prichard Committee sponsored by a grant through NCFL (KY Collaborative for Families and Schools Bluegrass Region), a partnership to locally offer GED test preparation in conjunction with entry-level employment opportunities with Appalachian Regional Healthcare (ARH) and Pikeville

Medical Center, a state partnership with the American Association of Retired Persons (AARP) promoting adult education to adults over 50 years of age as more college and career opportunities open up for their employment, and connection points to service through Department for Community-Based Services (DCBS) offices.

- High quality professional development: In FY18-19, KYSU piloted a new model that placed emphasis on internal, continuous, job-embedded communities of inquiry interested in monitoring relevant data and improving student outcomes. The new KYSU Professional Learning (PL) Model was implemented in October 2018. The model was first introduced to Program Directors and Assistant Program Directors in a two-day, interactive meeting. Program Directors and Assistant Program Directors were given the opportunity to provide feedback on the new model and engage in a question and answer session regarding implementation.

Then, a series of 11 rollout sessions were hosted around the state to introduce the new KYSU PL Model to instructors. During the 11 regionally-based rollout sessions, Program Directors, Assistant Program Directors, and instructors were also introduced to new instructional technology tools used to facilitate professional learning. Google Classrooms and Zoom Videoconferencing were adopted as part of the new model, and all providers were given an opportunity to practice using the technology at each of the live rollout events.

Professional Learning Communities (PLCs) are the centerpiece of the new KYSU PL Model. PLCs emphasize student focus, provider voice, and local innovation. In the FY18-19 pilot phase, KYSU PLCs learned from each other, practiced what they have learned in their classrooms, and shared outcomes with each other. The ultimate goal is that PLCs will have long-term impact on cooperative problem-solving affecting local program performance.

Each of the 27 KYSU provider-based PLCs was assigned a PLC Coach tasked with facilitating PLC meetings targeted towards creating a product to remedy a data-based provider challenge. PLC Coaches also worked with providers to ensure an array of new student-centric instructional resources were being used to support improved student outcomes. These resources include a new Kentucky Skills U Instructional Framework Series designed to improve the quality and efficiency of Mathematics and Reasoning through Language Arts instruction; a new Student Persistence/Retention Framework containing strategies targeted to adult learners; a new website warehousing the PLC-developed culminating products, and an enhancement of the existing Kentucky Skills U Lesson Bank.

KYSU Professional Learning Requirements were also recalibrated as part of the overall KYSU PL Model re-design. Learning requirements for Program Directors, Assistant Program Directors, and Experienced instructors working 500+ hours per year were revised to allow for vertical integration and collaboration among veteran KYSU instructional staff.

Provider perceptions of the pilot were monitored between October 2018 and June 2019 via anonymous electronic surveys, face-to-face interactions, and focus groups. By the end of the fiscal year, programs reported positive experiences with the overall intent of the new model, PLCs, PLC Coaches, and PLC processes.

Subsequently, in an effort to instill greater innovative approaches to recruiting, retaining, and awarding more credentials to students without a high school credential or its equivalent, KYSU requested “innovative fund proposals” (IFPs) from providers this year. Once the proposals were approved (using a standardized set of criteria for all) by committee, providers were sanctioned to operationalize projects. Many proposals focused on instructional technology and distance learning. As one way of promoting project success, this year’s PLCs (including College and

Career Navigators [CCNs] as members) charged PLC coaches with facilitating the development and implementation of project action plans. Local program directors have an opportunity to share successes and challenges periodically throughout the year. They presented current progress at November's (2019) program directors' meeting.

KYSU plans to continue to use the PLC model to foster problem-solving and decision-making based on data analytics and to unite and focus program staff. KYSU has/will analyze qualitative and quantitative data to determine supportive themes for future PLC work. Themes will target elements that further KYSU's strategic goals of relationship building, recruiting, retaining, results, and referrals to support quality services and successes for students.

- PL plans: Professional Learning Communities (PLCs) have been organized in two tiers: local and state. Locally, each of our 27 providers has its own provider-specific PLC. Statewide, PLCs are organized by instructional contexts shown to offer the greatest potential for statewide professional growth, as evidenced by performance data. These statewide PLCs include Corrections instruction, Mathematics instruction, Instructional Technology, and English as a Second Language instruction.

The KYSU Professional Learning Model will be further modified to address emerging statewide trends, such as the need for more robust, cohort-based, differentiated instruction. The work of PLCs will be leveraged to ensure needs are met. Specifically, emphasis will be placed on developing innovative models for cohort-based, differentiated instruction. This modification will include a three-pronged approach.

First, successful instructional innovations launched by provider-specific PLCs will be identified, modeled for other providers, and scaled. Special emphasis will be placed on local innovations that have shown success in student cohort development. Next, new digital literacy/distance learning initiatives will focus on harnessing instructional technology for differentiated instruction and cohort development.

The KYSU Professional Learning Model already utilizes free G Suite cloud computing, productivity tools, collaboration tools, software, and products. These resources, along with other adult education-centric instructional technologies, will provide the infrastructure for a statewide network of distance learning and learning center-based cohorts. Professional learning rooted in best practices for edtech-based differentiation will ensure differentiated cohort sustainability. Ultimately, the initiative will also provide 21st Century digital literacy skills for students and staff.

Finally, professional growth electives and product pilots will be launched in direct response to data-based provider needs. These electives and product pilots will simultaneously allow for greater precision in provider choice of fine-tuned professional development options, while also continuing the dual themes of differentiated instruction and innovative cohort development.

- Technical assistance: KYSU has four state-level employees (one program director, three regional coordinators, and one Kentucky Adult Education Reporting System [KAERS] administrator) who provide technical assistance to KYSU-funded adult education providers in Kentucky. Each of the regional coordinators serves the technical assistance and policy and procedural interpretational needs of local providers in a different region of the state. The KAERS administrator works with all providers to provide technical assistance related to Skills U's student information system called the Kentucky Adult Education Reporting System KAERS.

Within the first couple months of the new fiscal year, KYSU conducts awareness training on policy and procedures and new features of KAERS. KYSU typically hosts informational sessions for program directors quarterly. These sessions are designed to provide information on policy and procedures, share best practices, and engage existing and potential partners through awareness training and strategic partnership planning events. The use of KAERS data and reporting features are frequently underscored to support providers in achieving performance and accountability measures using data analytics. Other foci for technical assistance occasions have included the GED+Plus co-enrollment program and partnerships with Probation and Parole, Supplemental Nutrition Assistance Program (SNAP), and Cabinet for Health and Family Services (CHFS).

Regional coordinators also conduct quarterly phone calls with all local program directors to review performance data and strategies for improving outcomes. Directors are asked to rate strategies for effectiveness. These calls afford the directors the opportunity to address successes and challenges concerning their innovation and PLC plans and targets as well.

Throughout the year, new information relative to performance, WIOA, etc., is disseminated through mass e-mails and other forms of online communication. Regional coordinators also respond to program inquiries via telephone and e-mail and make single program visits as requested. Surveys, focus groups, and interviews are ways in which KYSU solicits input and feedback on subjects relative to TA and potentially PL.

- **Monitoring and Evaluation:** KYSU is strongly committed to ongoing data analytics supporting local program success in producing quality student outcomes based on core indicators of performance. KYSU staff monitor, evaluate, share resources, and provide TA in a myriad of ways, both directly and indirectly. Presented below are some of KYSU's major monitoring, evaluation, and program support components.
  - KYSU's program administration and accountability team act as liaisons between KYSU and local programs. KYSU provides information on state and federal policy and procedures; monitors and evaluates program compliance and performance, and assists in data-informed analysis and program plans for development; provides local programs with information on best practices; and promote the efficient and effective use of resources. When warranted, team members direct on-site compliance visits, gathering information that may not be readily available through KAERS reports. An end-of-year narrative is expected to be submitted by all local programs reflecting on the concluding program year and ways in which they plan to implement improvements for the coming program year.
  - Monitoring activities are conducted throughout the program year. Desktop compliance checks are performed quarterly. Documentation is requested from local providers to demonstrate compliance with implementation guidelines. Following a comprehensive review of KYSU's Kentucky Adult Education Reporting System, desk reviews are based on indicators that reflect meaningful and measurable achievement, are aligned with established goals, and obtainable through KAERS. Additionally, a secondary data analysis further examines characteristics of performance. This action ensures that both KYSU and the local program directors are aware of and effectively use data to monitor program performance and accountability.

Each year 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 KYSU policy. KYSU will continue this practice unless regulatory guidelines dictate differently.

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

Technology: Building upon the insights from the 2017-18 commissioned report on the state of KYSU instructional technology integration, KYSU intensified efforts to ensure full integration of technology in the classroom, as measured by students' – not instructors' – use of technology in the classroom and remotely.

A new member of the College and Career Preparation team was hired to concentrate on instructional technology support for both state and local initiatives. As mentioned above, many innovation projects involved technology, online courseware is used by providers (including Kentucky Educational Television's [KET], Fast Forward, Burlington English, Aztec, EdReady, WIN, and others) and preliminary distance learning discussions emphasize that to reach more students, new and innovative delivery mechanisms are necessary.

Google Classroom and Zoom Videoconferencing have been adopted as essential instructional tools in the new KYSU PL Model. These tools provide no-cost, easy-access options for professional learning and instruction. The goal is to model the use of instructional technology tools in all professional learning initiatives so instructors gain familiarity with the technology and continue use with students. For example, all 27 provider-based PLCs utilized 27 unique Google Classrooms to facilitate PLC interaction. The College and Career Navigator (CCN) Coordinate uses it to communicate with CCNs statewide as well.

In FY 18-19 KYSU created a new Instructional Technology Framework. This interactive framework is intended to be a living document that is open to feedback from instructors. The examples of instructional technology described in the framework are meant to be supplements to quality instruction, not replacements for it. The framework supports the KYSU philosophy that sound instruction is designed around clear learning objectives. Integration of the technology tools highlighted in the new framework allow for greater contextualization and digital literacy needed for college and career success.

Professional learning was delivered in face-to-face, online, or blended formats by PD contractors from the Adult Education Academy at Morehead State University and the National Center for Families Learning (NCFL).

## 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*

Pursuant to the local provider's contract with KYSU, the local provider is responsible for operating the program in compliance with the fiscal year's Kentucky Skills U Professional Learning Plan. As the instructional leader of the program, the program director ensures all staff understand and fulfill the professional learning requirements included in KYSU's Professional

Learning Handbook. CCP staff track compliance throughout the year and non-compliance is noted in the provider's file for reference during grant competitions.

KYSU continues to use Kirkpatrick's Four - Level Evaluation Model to inform professional development. The Kirkpatrick Model includes evaluating participants' reactions, learning, behavior, and results relative to a specific professional development course.

KYSU utilizes PLCs for all experienced instructors, CCNs, assistant directors, and program directors working 500+ hours per year. These provider-based PLCs are required to meet four times per year under the direction of a PL coach. KYSU-designed meeting templates, KYSU project templates, and PLC Google Classrooms are used to ensure consistency in process. Furthermore, all PLCs are required to develop a capstone product designed to improve program performance. These products are assessed using a KYSU PLC product rubric. Products are further assessed by the KYSU CCP team before publication on the new KYSU PL website.

KYSU has designed and implemented the KYSU Classroom Observation Tool based on the Adult Education Teacher Competencies™. The Tool provides program directors with an evidence-based profile of current instruction in their programs for the purposes of professional learning.

#### *Program Administration and Accountability*

KYSU is continuously seeking new ways to analyze and draw conclusions from the data. KYSU built KAERS, a robust data collection system. Local providers have been trained on the use of KAERS and reports that provide them real-time performance and accountability information. It will continue to be a large portion of how to monitor and evaluate program services, professional development, instructional strategies, program efficiencies, etc. KYSU uses a data quality checklist and has provided guidance to providers on maximizing data quality.

KYSU's program support team members act as liaisons between KYSU and local programs. KYSU 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.

KYSU is strongly committed to helping ensure local program success in producing quality student outcomes based on core indicators of performance. As mentioned under Perkins Leadership Grant Funding, local CCNs are intended to be an additional support mechanism to ensure students remain in the program and achieve their education goals. CCNs refer students to appropriate community services to assist in overcoming non-educational barriers, complete the Career Pathway planning form with student's, and advise them based on labor market needs, skill sets, and interests in pursuing a career.

KYSU annually produces *Implementation Guidelines* in which performance expectations are asserted. These include, WIOA's common performance measures and goals emphasizing HSE attainment, measurable skill gains, and targeted enrollment. As mentioned above, the Program Administration and Accountability team monitors compliance and performance throughout the year. At year end, providers are expected to reflect on the prior year's performance and identify potential areas for development. If providers do not achieve at least 50% of performance goals, TA will provided to develop a Performance Improvement Plan (PIP) that will be monitored and modified for success over the approaching program year.

#### ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM CERTIFICATIONS



States must provide written and signed certifications that:

The State Plan must include	Include
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; and	Yes
8. The plan is the basis for State operation and administration of the program;	Yes

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM ASSURANCES

The State Plan must include assurances that:

The State Plan must include	Include
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 the supplement-not-supplant requirement);	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. 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
5. 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

AUTHORIZING OR CERTIFYING REPRESENTATIVE

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.

Please download and sign the forms below. Please scan and return the forms to [wioa@ed.gov](mailto:wioa@ed.gov) at the same time you submit your State Plan via the portal.

1. SF424B - Assurances – Non-Construction Programs  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
2. Grants.gov - Certification Regarding Lobbying  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)
3. SF LLL Form – Disclosure of Lobbying Activities (required, only if applicable)  
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>)

<b>APPLICANT'S ORGANIZATION</b>	<b>Enter information in this column</b>
Applicant's Organization	KY Office of Adult Education, Skills U, Department of Workforce Investment, Education and Workforce Development Cabinet
<b>PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE</b>	<b>Enter information in this column</b>
First Name	Martin
Last Name	Hammons
Title	Commissioner
Email	Marty.Hammons@ky.gov

**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 following instructions posted at <https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc>.

- Competitive process Section III(b)5.B.(i)]: During grant year 2020-21, KYSU will develop a new competitive application process for federal AEFLA funding to determine the eligible providers that will be awarded funds starting July 1, 2021. The review of proposals will include rating responses addressing the 13 considerations in Title II of WIOA and other factors that indicate the applicants' ability to produce measurable skill gains and other defined metrics. Through this process, KYSU will identify, assess, and award multi-year grants 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 Section III(b)5.B.(ii)]: All KYSU RFAs 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 RFAs 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 in 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.]

- Kentucky completed the RFA process for services under WIOA. As part of that RFA process, each applicant was directed to address the thirteen AEFLA considerations. Consideration number two addresses special needs populations and barriers. KYSU 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.
- New Language
- Skills U, an office of Education and Workforce Development Cabinet (EWDC), provides policy guidance, technical assistance and professional learning opportunities to state and local provider staff to support and ensure quality adult education services and student achievement. Skills U hosts quarterly program director meetings to provide information, technical assistance, and opportunities for feedback. Hiring directives (e.g., position descriptions, educational and skill requirements, etc.) guide the state and local providers to recruit and select qualified and degreed candidates. Skills U supports professional development to improve instruction strategies for instructors and instructional leaders with the goal of advancing high quality, standards-based academic instruction; workforce preparation and occupational technical education contextualization of content; and integration of digital literacy and other pertinent content into academic instructional practices. This has included yearlong institutes, online courses, and/or professional learning communities. The Program Administration and Accountability unit monitors provider compliance and provides technical assistance so that policy and procedures, designed to perpetuate quality services and student outcomes, are implemented.
- State employees are hired and operate according to the legislative, regulatory, and policy mandates of the Kentucky Personnel Cabinet and the EWDC. State employees may avail themselves of several development opportunities and provide feedback to administrative authorities. 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.
- 

#### ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

## **Performance Goals for the Core Programs**

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and
- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the 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.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	44.0%	44.0%	45.0%	45.0%
Employment (Fourth Quarter After Exit)	43.0%	43.0%	44.0%	44.0%
Median Earnings (Second Quarter After Exit)	4,100.0	4,100.0	4,125.0	4,125.0
Credential Attainment Rate	48.0%	48.0%	48.0%	48.0%
Measurable Skill Gains	51.3%	51.3%	51.4%	51.4%
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup>

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

**PROGRAM-SPECIFIC REQUIREMENTS FOR VOCATIONAL REHABILITATION  
(COMBINED OR GENERAL)**

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan [13] must include the following descriptions and estimates, as required by section 101(a) of the Rehabilitation Act of 1973, as amended by title IV of WIOA:

---

[13] Sec. 102(b)(2)(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 meet 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.

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 other individuals with 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 State Rehabilitation Council (SRC) meets the requirements under the Kentucky Revised Statutes 163.470 and 34 CFR. 361.29. This required the agency to submit candidate recommendations to fill vacant council positions for the newly established council to the governor's office for appointment. In August of 2019, the Governor signed the executive order establishing the newly formed Council. The executive order came later than expected and as a result the Council was only able to hold one quarterly meeting for the period of October 1, 2018 through September 31, 2019. The Council is committed to holding four quarterly meetings in 2020 in compliance with the federal regulations.

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 skill acquisition.

## **Summary of Input of the State Rehabilitation Council**

The newly formed Council held its first meeting on August 12-13<sup>th</sup> 2019 with a full quorum in attendance. OVR held a half day orientation for the newly formed Council on day one that included an overview of vocational rehabilitation field services, Blind Services, committee description and selection, travel reimbursement and Robert's Rules of Orders.

On the second day the full council met. The SRC reviewed and approved the bylaws with the caveat that the amendment clauses would be discussed at a future meeting and a brief overview included in the next agenda. The SRC elected a chair and vice-chair of the council. David Allgood will serve in the capacity as Chair and Joe Cowan Vice-Chair. David Allgood, as Chair made the selection for Todd Stephens to be the Member at Large. The newly established committees of the council are as follows: 1) Executive Committee; 2) Public Awareness and Legislative; 3) Policy and Planning; 4) Consumer Services and Program Evaluation; 5) Ad Hoc bylaws; and 5) Blind Services.

The Policy and Planning committee addressed the topic of the State Plan and identified a schedule for the public hearings. The newly formed committee made a selection of a chair and vice-chair. The public hearings for providing input for the State Plan were held as follows:

Louisville: 4:00 -- 6:00 p.m. (EST), November 4, Charles W. McDowell Center, 8412 Westport Road, Louisville, KY 40242

Thelma: 4:00 -- 6:00 p.m. (EST), November 6, Carl D. Perkins Vocational Training Center, 5659 Main Street, Thelma, KY 41260-8609

Covington: 4:00 – 6:00 p.m. (EST), November 12, Kentucky Career Center, 1324 Madison Avenue, Covington, KY 41011

Owensboro: 4:00 – 6:00 p.m. (CST), November 13, Kentucky Career Center, 3108 Fairview Drive, Owensboro, KY 42303

Hazard: 4:00 – 6:00 p.m. (EST), November 14, Kentucky Career Center, 412 Roy Campbell Drive, Hazard, KY 41701

Lexington: 4:00 – 6:00 p.m. (EST), November 19, Lexington Public Library (Beaumont Branch), 3080 Fieldstone Way, Lexington, KY 40513

Comments were accepted by mail to the Office of Vocational Rehabilitation, 275 E. Main St., Mail Drop 2-EK, Frankfort, KY 40621, via e-mail to [ChrisJ.Sheeting@ky.gov](mailto:ChrisJ.Sheeting@ky.gov), via fax at 502-564-6745, or by phone at (502)782-3458 by November 30, 2019. A draft of the State Plan Attachments were posted on the OVR website for public access.

The Consumer Services and Program Evaluation committee reviewed and accepted the Consumer Satisfaction Survey report conducted by the Human Development Institute at the University of Kentucky. The committee initiated a discussion on how to proceed with revising the current satisfaction survey to cover the needs of the populations served as a result of the recent reorganization forming a combined agency. A chair and a vice-chair were chosen.

The Public Awareness and Legislative Committee met and a chair and vice-chair were chosen. The main topic for this committee was the Council annual report. The theme chosen was "Stronger Together" reinforcing the reorganization and combining of the general and blind agency.



The newly formed Blind Services committee selected a chair and vice chair. This committee discussed topics specific to specialized services for the blind and visually impaired. The main discussion surround the shortage of certified Orientation and Mobility (OM) instructors.

The Bylaws committee will focus on the revision of the bylaws given the reorganization and combining of the general and blind agencies. A chair and a vice-chair were chosen.

The council accepted the minutes of all the committee meetings. The council made the decision have another meeting on October 28, 2019

The Council held its first quarterly meeting of the fiscal federal year for 2020 on October 28. A full quorum was in attendance.

The Executive Leadership of the office gave reports to the Council regarding field services including order of selection, numbers served and the numbers currently on the waiting list (31). Each Division Director gave their respective reports. There were no recommendations from the council regarding the information shared. The Executive Director and Director of Field Services were absent from the meeting in attendance at the National Council of State VR Directors but submitted reports to the council in advance of the meeting.

Two presentations were given to the council at the first quarterly meeting. Jimmy Brown, the Kentucky Assistive Technology Network Coordinator make a presentation on the statewide program. Topics covers were the Reuse Program, which relates to durable medical equipment, hearing aids as well as the Ramp Up Program.

Katie Wolf-Whaley, Project Director at the Human Development Institute (HDI) gave a presentation of the 2018 Consumer Satisfaction Survey/Report. There were 1001 responses to the survey with an 68.9% response rate. The report looked at the satisfaction with OVR services as it relates to both field offices and the Community Rehabilitation Programs (CRPs). 86.9% of the respondents reported services were good or very good. Individuals closed successfully with competitive integrated employment reported services were good or very good from OVR was 93%. Overall, 90% of respondents reported they would consider received services from OVR if needed in the future.

The council requested a presentations at the next meeting from the Kentucky Blind Enterprises Program along with the Community Council of Developmental Disabilities.

The Ad Hoc Bylaws Committee continued its work on the bylaws. There were no recommendations

The Blind Services Committee re-emphasized the need for Orientation and Mobility services to be offered at the center and throughout the state. This committee made the recommendation to look at the existing Satisfaction Survey and consider how to capture information on all "opinions" for the survey. They suggested this could include former questions from the previous blind agency survey or changing the wording in the next cycle.

The Policy and Planning Committee addressed the topic of the State Plan and the public forums that will be taking place in November. The State Plan Goals and Objectives were reviewed for the combined agency. The committee covered the topic of Pre-Employment Transition Services (Pre-ETS). The committee suggested that OVR make contact with non-Profit organizations to provide work experiences for students since to improve services.

The Public Awareness and Legislative Committee discussed the content of the annual report. They also covered the area of marketing and shared ideas about how to increase the visibility of

OVR services utilizing social media outlets, such as Facebook, the KCC.gov website, and business cards for council members.

The council accepted the minutes of all the committee meetings. The second quarterly meeting will be held on January 27, 2020

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

**Recommendation:** The committee made the recommendation to look at the existing Satisfaction Survey and consider how to capture information on all "opinions" for the survey. They suggested this could include former questions from the previous blind agency survey or changing the wording in the next cycle.

**Response:** OVR accepts the recommendation to review the Satisfaction Survey with the council and gain input to the content of the survey. The Consumer Services and Program Evaluation Committee of the Council are at the quarterly meetings reviewing the questions and making recommendations for edits for the survey to assure the survey captures all the necessary components. The committee will make recommendations to the full council upon completion of their review for edits to the Satisfaction Survey.

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

OVR 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. 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 has representation on the State Interagency Council (SIAC) for services and supports to Children and Transition-age Youth (SIAC) is a group consisting of state agency representatives, a youth, a parent of a child or transition-age youth with a behavioral health need, and a member of a nonprofit family organization. SIAC conducts monthly meetings that are open to the public. Regional Interagency Councils (RIACs) operate as the locus of accountability for the system of care, providing a structure for coordination, planning and collaboration of services and supports

at the local level to children, adolescents, and transition-age youth and their families, to help them function better at home, in school, in the community and throughout life. There are 18 RIACs across the commonwealth.

Kentucky's Commission on Services and Supports for Individuals with Intellectual and Other Developmental Disabilities (also known as HB 144 Commission) advises the Governor and General Assembly about the service system that impacts the lives of people with disabilities. A sub-committee of the HB 144 commission was established to address issues impacting employment for persons with developmental disabilities. Comprised of members representing state agencies, service providers, advocacy agencies, lawmakers and people with developmental disabilities, the committee has set out to identify what must occur to create an efficient employment system that is supportive of people with developmental disabilities obtaining meaningful employment in the Commonwealth. OVR Executive Director represents the agency on the HB 144 commission.

OVR has representation on the Commission on the Deaf and Hard of Hearing (KCDHH) advisory board that provides education, advocacy, and programs to eliminate barriers for deaf and hard of hearing Kentuckians.

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". OVR 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.

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 preschoolers 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 Innovation Board (KWIB) serves as an advisory board to the Governor on workforce training and development issues. The KWIB is charged with creating a statewide vision for workforce development and adopting a plan to move Kentucky forward through workforce training and development.

Reciprocal referral services with the Career Development Office and the Office of Vocational Rehabilitation: CDO 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.

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 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 DEPARTMENT OF AGRICULTURE;

In 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. Specifically in 2020, the USDA Rural Development made \$55.3 million available

funding to rural Tennessee and Kentucky communities across the Commonwealth for the area of high-speed broadband infrastructure projects. 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. NON-EDUCATIONAL 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 OVR and/or a CRP without having to utilize the competitive procurement processes.

#### D. COORDINATION WITH EDUCATION OFFICIALS

Describe:

1. 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 transition and pre-employment transition services to be provided by either OVR or our partners.

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.

OVR partners with the public school districts, Department of Education and the University of Kentucky Human Development Institute to provide transition services and pre-employment transition services through the Community Work Transition Program (CWTP). 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. The CWTP contracts with the individual school districts to hire employment specialists to provide students with employment exploration and experiences, community-based evaluation, work experience and job placement while in high school.

OVR has contracted with the Kentucky Community 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 contract with the Jobs for American's Graduates (JAG) to provide pre-employment services 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.

Additionally, OVR has contractual agreements with each of the nine special education cooperatives in the provision of pre-employment Transition Services.

The office's executive director and state transition coordinators work directly when needed, with the Kentucky Interagency Transition Council. These involvements help facilitate all of the partner's understanding of the unique transition needs of students with disabilities and assists in understanding the educational process of Public Schools in the State.

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.

The Kentucky School for the Deaf (KSD) provides education to deaf and hard of hearing students from elementary through high school levels. It is a residential program in Danville, KY that also provides outreach services to students in their local schools. Vocational services include opportunities to prepare for work or continued education in the high school curriculum. An OVR Rehabilitation Counselor for the Deaf is assigned to students on campus.

The Office of Vocational Rehabilitation has staff trained to understand about the different problems people with hearing loss may have. Rehabilitation Counselors for the Deaf are proficient in American Sign Language and serve persons who are deaf and hard of hearing and use this type of communication. Communication Specialists are trained about devices and ways to serve individuals who are hard of hearing or late deafened with auditory/oral communication. Rehabilitation Counselors for the Deaf and Communication Specialists are also skilled in serving people who have vision limitations in addition to a hearing loss or deafness. Individuals who are deaf use American Sign Language are served by a Rehabilitation Counselors for the Deaf. There are Rehabilitation Counselors for the Deaf statewide to provide OVR services.

Examples of specialized services are and not limited to:

Information and counseling about jobs

Information and referral for other services

Assessment about job skills

Training programs with support services to learn job skills

Technology (including training) - for work related technology

Job placement assistance

Interpreting Services

The State Coordinator of Deaf-Blind Services (SCDB) works with, consults, and provides technical assistance to KY Office of Vocational Rehabilitation (OVR) staff including the Rehabilitation Counselors for the Blind (RCB), Rehabilitation Counselors for the Deaf (RCD), and Communication Specialists. Other staff include Managers, Blind Services Division Staff, and various other administrators within OVR. The SCDB also maintains relationships for service delivery with staff from the Helen Keller National Center (HKNC), Kentucky Commission for the Deaf and Hard of Hearing (KCDHH), The Kentucky Deaf-Blind Project, KY Mental Health Services for the Deaf and Deaf-Blind, Kentucky Association of Deaf-Blind (KADB), and several other Community Resource Providers (CRP). Kentucky has one of the largest Deaf-Blind census numbers with approximately 49,000 known individuals listed as being Deaf-Blind in the state. The SCDB also coordinates, plans, and oversees training and support for staff that work with this population.

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. 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. OVR collaborates with the Kentucky Deaf-Blind Project to provide a weeklong summer camp for eight to nine students who are Deaf-Blind that addresses the five required Pre-Employment Transition Services. This program is unique to Kentucky, and other Deaf-Blind Projects across the nation are interested in replicating it in their states.

The PATH Program is a three-week Pre-employment Transition Services program held at the McDowell Center in Louisville, KY. This program is conducted in collaboration with the University of Kentucky's Teacher Preparation Program in Visual Impairments. Through the University of Kentucky, practicum students from the teacher preparation program are able to assist with the providing the Pre-employment Transition Services to up to fifteen blind or visually impaired students from across the state. The University of Kentucky also provides staff

such as Orientation and Mobility Specialists that assist the McDowell Center staff provide the five required Pre-employment Transition Services.

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.

## 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. 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. Currently OVR, HDI the Center for Excellence at the University of Kentucky and KDE are meeting monthly to address policy and procedural changes to address the Community Work Transition Program and transition services, pre-employment transitions services, data sharing agreements and a clear identification of each of the roles of the partners involved in the agreement. OVR anticipates the agreement being finalized by the first of the year, January 2021.

OVR receives ongoing technical assistance from the WINTAC for the area of pre – employment transitions services. WINTAC staff provide guidance to assure we have a clear understanding and interpretation of the regulations and any other federal guidance received from the Rehabilitation Services administration. Based on feedback from WINTAC and the results of monitoring reviews from other states, OVR is working on implementing a stronger internal controls system. OVR staff will be responsible for monitoring the delivery of pre-employment transition services provided by other entities to ensure the quality of services provided and the accurate reporting of services. Contracts agreements are in place so that OVR has more involvement in the approval of services for students with disabilities for services. OVR’s current case management system and the ability to pull accurate information through the Web Intelligence program has not been as strong as it could be. Currently, two staff, including the VR Administrator responsible for monitoring, are learning about using Power BI as an alternative way to pull more accurate data from the case management system.

OVR provides ongoing technical assistance to providers of transition and pre-employment transitions services. Effective July 14, 2018 the Executive Director of the Office of Vocational Rehabilitation (OVR) was appointed to serve as a voting member of the State Interagency Council (SIAC) for Services and Supports to Children and Transition-Age Youth. The Executive Director or a designee attends monthly SIAC meetings to collaborate on the matters of the council as it relates to youth who are Kentucky students with disabilities. During a SIAC meeting that was held on July 18, 2018 OVR did a presentation to educate the council and it’s meeting attendees about OVR’s Pre-Employment Transition Services (Pre-ETS) for students with disabilities who are between the ages of 14 and 21. The monthly SIAC meetings gives OVR the opportunity to collaborate, plan and develop on going partnerships with other state agency representatives who serve mutual individuals with disabilities.

Regional OVR representation has been established for the Regional Interagency Councils (RIAC) for the system of care to have consistent OVR representation. An OVR regional representative attends monthly RIAC meetings to establish partnership with state, public and community agencies to address concerns that families have within the regions of Kentucky. OVR regional representation supports the momentum of the system level work that is occurring statewide. Strategies are set in place to promote children’s social and emotional needs where they live, learn, work, and play by sharing information on the available services that is within the regions of Kentucky. Priority areas includes:

- Outreach and Promotion,
- Disparities and Disproportionate Minority Contact
- Social and Emotional Health

OVR and the Kentucky Department of Education continues to meet quarterly with interested interagency partners and serve as the catalyst for development and implementation of an infrastructure which supports youth with disabilities to transition from high school to post-secondary school and employment. Pre-Employment Transition Services will continue to represent the earliest set of services available under OVR for students with disabilities, which are short-term in nature and are designed to help students identify career interests.

OVR has an agreement with the KDE for transition planning and service delivery 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 combined 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.

In December 2019, a survey was sent to Pre-employment transitions service providers and OVR staff to receive feedback on areas where additional training and technical assistance is needed where gaps in services exist. The results of the surveys indicated that providers felt that they needed more training in approaching and interacting with employers, understanding more about Pre-employment transitions services. Another area identified was overall providers were seeking additional face to face meetings and training throughout the performance year in order to clarify guidance. There also appeared to be a pattern of inaccurate information being given or perceived by providers. The survey results from OVR staff indicated a concern about the quality of services being provided, the lack of documentation from providers, as well as issues surrounding monitoring of services. In response to these concerns, OVR is developing a training plan for statewide providers and staff. OVR implementing requirements for Pre-ETS providers to provide notes and documentation of services provided. OVR is in process of the development of a pre-VR data system with the University of Missouri to develop a program to capture data in a more consistent quality manner.

OVR is reaching out to underserved groups to build capacity in serving these populations. A partnership with the individual at the KY Department of Education who oversees the McKinney-Vento Homeless Assistance Act has been initiated to try to identify students with disabilities that may fall through the cracks of receiving services. OVR is working on expanding its relationship with the Kentucky School for the Deaf. A group of stakeholders is part of an Engage for Change group in Kentucky. This is a national effort through the National Deaf Center on Postsecondary Outcomes. OVR maintains strong relationships with the KY Deaf-Blind Project and the Kentucky School for the Blind continue, and the programs with these partners are frequently reviewed to improve the quality of these services. Some pre-employment transition service providers are working students with disabilities in the Department of Juvenile Justice, Foster Care, and homeschool programs to reach these populations.

#### **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, as stated in Kentucky Special Education Regulation 707, KAR 1:320, Section 7:1, transition planning can start in the child's 8<sup>th</sup> grade year or when the child turns age 14, or earlier if the ARC deems it appropriate, in alignment with the child's Individual Learning Plan (ILP). 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 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 are 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 competitive, integrated employment.



Outreach to students also occurs through OVR's contractual agreements with the Kentucky Career and Technical Educational College System, Jobs for American Graduates (JAG) and the nine Special Education Cooperatives for pre-employment transition services.

Jobs for Kentucky's Graduates (JAG KY) operates its curriculum program in conjunction with the Kentucky Office of Vocational Rehabilitation to service students in their program who have disabilities and who are potentially eligible and/or eligible for the Office of Vocational Rehabilitation. JAG provides a curriculum for in-school youths with disabilities who have significant barriers to success that includes academic, physical, psychological, work related, and/or environmental. JAG KY provides a curriculum for the target population of in-school youths with disabilities between the ages of 14 and 21 and have significant barriers to success. The areas for the curriculum will include career development, job attainment, job survival, basic skills, leadership and self-development, personal skill, life survival skills workplace and economic empowerment. JAG KY employs and certifies "Specialist" who are assigned to the schools that have a JAG KY Program through Kentucky.

The Kentucky Special Education Cooperative Network consists of nine (9) Special Education Cooperatives located across the state.

1. Central Kentucky Educational Cooperative (CKEC)
2. Green River Regional Educational Cooperative (GRREC)
3. Greater Louisville Education Cooperative (GLEC)
4. Kentucky Educational Development Corporation (KEDC)
5. Kentucky Valley Educational Cooperative (KVEC)
6. Northern Kentucky Cooperative for Educational Services (NKCES)
7. Ohio Valley Educational Cooperative (OVEC)
8. Southeast/Southcentral Education Cooperative (SESC)
9. West Kentucky Educational Cooperative (WKEC)

Transition Specialists are hired by the cooperatives to provide the five core pre-employment transition services. They provide transition services focused trainings with participation for students from several school districts in their regions. Staff coordinate with local education agencies to provide the opportunity for students to participate in a variety of summer workshops/camps/ internships and local College visit. Staff hold comprehensive weekly group workshops to the schools in their district during the school year.

The Community Rehabilitation Program (CRP) provides Pre-employment Transition Services on a Fee Schedule in groups or individual. Proposals for CRP Pre-ETS programs are submitted to the OVR CRP Branch. CRP programs provide the five required pre-employment services: Job exploration counseling, work based learning experiences, post-secondary counseling, workplace readiness training, and self-advocacy. CRPs provide in-school and after-school Pre-ETS.

Section 511 of the Workforce Innovation and Opportunities Act (WIOA) requires the Office of Vocational Rehabilitation (OVR) to perform certain actions before an employer can pay an individual, especially youth with a disability a wage that is below the standard minimum wage. The Kentucky Office of Vocational Rehabilitation has provided subminimum wage facilities within Kentucky access to a Career Counseling video that is to be shown to individuals according to the requirements set forth in WIOA. The Career Counseling Participation Form is

completed on each individual and provided to the Community Rehabilitation Program (CRP) Branch of OVR as required. The OVR offers multiple Pre-Employment Transition Services opportunities for youth with disabilities to ensure that this particular WIOA mandate is met. The OVR ensures that all OVR staff are trained to understand that before a youth with a disability can enter in to subminimum wage employment, the youth must be determined eligible, have an approved Individualized Plan for Employment, have been working toward their vocational goal for a reasonable period of time with appropriate supports, but without success and be closed from the OVR. The CRP Branch continues to monitor and provide technical assistance to subminimum wage facilities and OVR staff to ensure these requirements are met. We keep records on all the individuals that receive Career Counseling. Their first year in the subminimum wage facility they receive the Career Counseling twice and then annually thereafter. They are also given information regarding available resources in the community that will help them with services to obtain employment and support.

The Office assures that in accordance with 34 CFR 397.31 that we will not enter into an agreement

#### E. COOPERATIVE AGREEMENTS WITH PRIVATE NONPROFIT ORGANIZATIONS

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 works with Community Rehabilitation Providers (CRPs) through a vendor application process to ensure quality services to agency consumers. OVR currently works with 115 CRP's. Currently, 69 CRPs provide Employment and Retention services resulting in competitive integrated employment outcomes, and another 91 CRPs provide Supported Employment services resulting in competitive integrated employment outcomes. Of the 115 vendors, 50 provide both Employment and Retention and Supported Employment services. Other agreements with private, non-profit OVR service providers will be made as necessary.

The process for approval of a vendor as a supported employment provider is more involved and is outlined below:

- The vendor obtains an application from the Community Rehabilitation Program (CRP) Branch.
- Upon completion of the application it is returned to the CRP branch.
- The CRP Branch staff reviews the application and seeks additional information when needed. Staff may meet with the provider for further technical assistance.
- The application is approved and vendor status is established.
- The CRP Branch assists the provider with training and other information.
- All vendors are required to participate in the Supported Employment Training Project provided through the University of Kentucky Human Development Institute.
- Monitoring occurs for all vendors during the year by the CRP Branch staff.
- All Community Rehabilitation Programs are audited annually and 15 hours of continuing education units (CEUs) are required annually.

- All CRP Application Agreements will be renewed every two years (current ones are good through 2021).

#### F. ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES

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.

Community Rehabilitation Program providers across the Commonwealth who are providing supported employment services are verified through written applications with the Office of Vocational Rehabilitation. The application process includes written verification of the CRP's funding for extended services. The Community Rehabilitation Program Branch evaluates all vendors to ensure that services are appropriately provided and funding is available for extended services.

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 verification of the provider's funding for extended services. Monitoring and technical assistance is provided by the OVR's Community Rehabilitation Program Branch to assure that services are provided and funded appropriately. CRP agreements are developed bi-annually and reviewed annually in 2019, the OVR implemented four Memorandums of Understanding to increase capacity for Customized Supported Employment services in high need areas throughout Kentucky. Four CRP providers were awarded these contracts after submission of Request for Proposals (RFP). RFP's were sent to non-profit agencies throughout the Kentucky that resulted in a total of eight submitting their proposal for review.

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. The Leadership Series program developed through HDI at the University of Kentucky, provides advanced training in systematic instruction, Discovery, Job Developing, and Social Role Valorization, and is designed to assist job seekers in acquiring customized employment.

OVR staff collaborate with Special Education planning units throughout the commonwealth to develop supported employment services for students exiting schools. As with all supported employment services, additional funding is needed for extended services in order to adequately serve students. The Supported Higher Education Project (SHEP) began in 2010, and funded through a grant to the University of Kentucky's Human Development Institute. The purpose of the project was to demonstrate the effectiveness of Community Rehabilitation Programs (CRP) working together with Post-Secondary Education programs to include people with developmental disabilities in classes and other college campus activities. OVR created a Service Fee Memorandum that would be utilized by CRP's to allow for supported education services. This project was discontinued in 2016. In 2018, focus group meetings took place in Morehead, Murray and Lexington in effort to identify barriers to students enrolling in higher education. As a result, the University of Kentucky's Human Development Institute received state appropriated funds to revitalize higher education programs and create new programs. This also resulted in

the development of a statewide technical assistance center and funding being distributed to Comprehensive Transition Centers throughout the state. OVR continues to utilize a Supported Higher Education Service Fee Memorandum that can be accessed by CRP's to ensure higher education support services are available for students with intellectual disabilities.

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 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

Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

##### 1. VR SERVICES; AND

The Department of Workforce Investment (DWI) in partnership with local and state workforce organizations is dedicated to providing proactive business services and industry skills development. Through local Kentucky Career Center Business Service networks, this

partnership has laid a foundation for coordinated business services that leverage the assets of the Office of Employer and Apprenticeship Services (OEAS).

Kentucky Career Center Business Services offer a streamlined approach to assisting businesses with recruiting talent, training new and existing employees, and developing tomorrow's workforce. At its core, the Business Service strategy consists of five primary organizations who provide direct resources and services to businesses:

- Local Workforce Development Boards (LWDB)
- Kentucky Education and Workforce Development Cabinet (EWDC)
- Kentucky Cabinet for Economic Development (CED)
- The Kentucky Chamber's Workforce Center (Workforce Center)
- Kentucky Community and Technical College System (KCTCS)

These partnering agencies strive to provide unified, efficient, quality and seamless workforce services and resources to new, existing and expanding companies within the Commonwealth.

The Kentucky Career Center Business Service strategy has four primary components:

- Identify a single point of contact for business development within each WIOA region
- Streamline workforce resource delivery
- Unify and coordinate outreach and information
- Leverage multiagency data sharing systems

Core programs and partners gained access to a business customer relationship management system based on a Salesforce platform. Phase 1 allowed shared access to employer contacts and business needs, and Phase 2 gave the partnership the ability to add and assess employer programs and resources. This platform allows the tracking of business engagement and reporting for the aligned goal of furthering business services, and is the tool that encompasses the Kentucky Integrated Business Engagement System (KIBES). The OVR Employer Services Branch is dedicated to employer outreach and consumer job placement services allowing for a consistent approach to services across the state. This enables 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 Employer Services Branch Manager who is responsible for the supervision and oversight of staff and statewide employment activities. This is inclusive of providing training and technical assistance to the Job Placement Specialists, developing 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. DWI shares with OVR 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.

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 have conducted employer engagement activities.

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.

OVR, University of Kentucky's Human Development Institute (HDI) and the Commonwealth Council of Development are partnering with the Kentucky Chamber of Commerce to present an Inclusive Workforce Summit in 2020. This will be a day long summit to educate and engage employers to hire individuals with disabilities and to work with OVR and other partners to assist and support this process. This is the first summit that the Chamber has sponsored concerning this initiative and it is hoped to be an annual event.

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

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.

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. OVR will work with its existing partnerships among workforce, economic development, education and business entities in fostering work based learning opportunities.

OVR has contractual agreements with each of the nine special education cooperatives and Jobs for American Graduates 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 postsecondary employment and training.

In 2018, the Kentucky Education and Workforce Development Cabinet (KEWDC) announced the transition of the Division of Apprenticeship from the Kentucky Labor Cabinet to KEWDC's Office of Employer and Apprenticeship Services in the Department for Workforce Investment. This service, in cooperation with the U.S. Office of Apprenticeship and Training, oversees the Commonwealth's registered apprenticeship program.

Kentucky's registered apprenticeship program continues to be a national model in preparing individuals for successful entry into the workforce. This administrative move builds upon momentum by harnessing KEWDC's existing statewide network to connect employers with potential employees and to provide increased apprenticeship opportunities for Kentuckians. There are over 4,000 apprentices in Kentucky in 300+ different programs currently representing 147 unique occupations.

The Registered Apprenticeship model is a flexible, employer-driven approach that provides high-quality job training and produces skilled, competent employees for Kentucky employers. The division is responsible for registering apprenticeship programs that meet federal standards, issuing nationally recognized and portable Certificates of Completion to apprentices, and promoting the development of new programs through marketing and technical assistance. 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 OVR 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.

OVR has worked with the Department of Medicaid Services to attempt to expand the Medicaid Works, Kentucky's Medicaid Buy-In program, to maximize the opportunities for OVR consumers to get employed in competitive, integrated employment. Eligibility requirements remain restrictive and very few individuals have qualified for Medicaid Works. OVR still feels a revised buy-in would help more individuals with disabilities become successfully employed. As detailed below in (2), Medicaid Waiver funding is utilized to provide long term supports for supported employment consumers, increasing the numbers of individuals who can benefit from supported employment services. OVR serves on numerous councils that also have representation from the Department for Medicaid Services. The agency will work to insure the provision of vocational rehabilitation services and if appropriate, accommodations or auxiliary aides and services.

##### 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.

OVR serves on numerous councils, boards, and planning committees, such as, the Commonwealth Council for Developmental Disabilities, as well as the Kentucky Advisory Council on Autism and the HB144 Commission relating to persons with developmental disabilities.

### 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. Currently, there are 18 IPS programs throughout Kentucky. In 2019, OVR participated in meetings with the Cabinet for Health and Family Services to initiate efforts to expand IPS Supported Employment services to individuals with opiate use conditions. OVR will continue to collaborate with other state partners to expand IPS and provide services to underserved populations. OVR serves on numerous councils that also have representation from the DBH.

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

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. 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;

(i) 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. 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 electronically through a state provided learning management system and contains records of each individual's training activities. Training accomplishments are reviewed at a 6 month interim review and annually in the Employee Performance Evaluation.

OVR has developed and maintains a Case Management System for review of all staff assignments, based on demographic data such as population, geographic area, caseload sizes and labor market analysis. In addition, the office solicits input to identify areas of understaffing, or of specific needs.

On October 1, 2018 the Kentucky Office of Vocational Rehabilitation and the Kentucky Office for the Blind merged into one agency with Kentucky Office of Vocational Rehabilitation as the official name. This merge also involved a reorganization of the agency and this report reflects the most current data based on the new organizational design. The organizational design includes the Executive Director's Office and 4 divisions. There are currently 368 classified and unclassified positions, 3 Federally Funded Time Limited (FFTL) positions and 65 contracted positions for a total of 436 positions.

## II. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

The **Office of the Executive Director** includes an Executive Director (1) that supervises executive leadership functions such as Deputy Executive Director (1), Division Directors (4), Program Policy and Support Branch Manager (vacant), Program Administrators (2 with one fulltime and 1 part-time), an assistant dedicated to personnel processes (1), Assistant (1) and an Executive Secretary (1) for a total of 11 employees. In the next 5 years there will be 6 of 11 employees eligible for retirement. In the absence of a Program Policy and Support (PPS) Branch Manager the Executive Director is also directly supervising that branch. There are 9 staff in PPS branch with Program Administrators (3), Program Coordinator (1), Resource Management Analyst (3) and Assistants (2). Of that number 2 are eligible for retirement in the next 5 years. According to the current personnel run there are 6 vacancies in the Executive Director and Program Policy and Support areas: Program Policy and Support Branch Manager, Executive Assistant, Voc Rehab Administrator I, Resource Management Analyst 1 (2) and an Administrative Assistant (1).

The **Division of Field Services** supervises all functions that occur within field offices including specialized counseling services for the deaf and hard of hearing and blind and visual disabilities. In addition, this division houses the ancillary supports for services. There are 282 classified, unclassified and FFTL employees in this division. This includes the Assistant Director (1), Regional Managers (5), Branch Managers (22), Counselors (124), Interpreters (5 and of that 3 are contract), Receptionists (2 contracted) Assistants (90 and 22 are contract). Ancillary staff includes the Employer Services Branch (14), Community Rehab Program Branch (3), Assistive Technology Branch (12 with 7 of the rehab techs on contract). Three vocational Rehabilitation

Administrators providing support for Pre-Employment Transition Services (1), Community Work Transition Services (1) and Social Security Reimbursement (1) with contracted assistant (1). Over the next 5 years it is anticipated that 25 will be eligible to retire based on service time with OVR calculating the retirement at 27 years. Of that 25 there are Assistants (6), Rehab Tech (1), Branch Managers (4), Counselors (12) and Employment Specialists (2). We find that many are leaving through resignation and not retirement. According to the current personnel run there are 21 positions vacant. Administrative Specialists (7), Interpreter (1), Counselors (12) and Voc Rehab Program Specialist (1).

The **Division of Blind Services** supervises independent living services, older individuals who are blind, deaf/blind, orientation and mobility, bioptic driving, employment/AT services and other services provided through the Charles McDowell Center. There are 38 classified, unclassified and contracted staff in this division. This includes IL/OIB (9), Deaf/Blind Coordinator (1), Bioptic Driving (2), Orientation & Mobility Instructors (2) and Facility Administrator (1) and an Assistant (2 contracted). The Facility Administrator supervises staff at the McDowell Center including: Administrator (1), Assistants (3), Community Resource Specialist (1), Consumer Services Coordinator (1), Instructor (4), Nurse (1), Patient Aide (1), Psychologist (1), Receptionist (1) a Work Experience Counselor (1), Tech Support (2), Dorm Residential Aide (3 and all are contracted) and 1 maintenance person (contracted). Based on years of services there are 8 within this division that could retire in 5 years. According to the personnel run there are 3 vacancies within this division. They are Voc Rehab Program Specialist II, Voc Rehab Specialist Certified and Voc Rehab Administrator II.

The **Division of Carl D. Perkins Vocational Training Center** is a residential facility that provides educational opportunities both away from home and coordinators services as needed with consumers in the area that do not need residential services. There are 94 employees in this division in classified, Federal Funded Time Limited (FFTL), unclassified or contracted. The Division Director is assisted by Administrators (4), Assistants (11), Branch Managers (3), Childcare Staff (2), Cooks (9), Counselors (3), Data Entry Specialist (1), Dorm Counselor (3), Drivers (2), Facility Security (6), Fiscal (2), Instructors (15), Janitors (3), Maintenance (6), Mental Health Counselor (1), Nurses (6), Occupational Therapy Staff (4), Patient Aide (2), Program Instructor (1), Psychologist (1), Physical Therapist (1), Recreation Staff (1), Speech Therapist (2), Staff Assistant (3) and Vocational Evaluator (2). Based on 27 years of service for predicted retirement there will be 5 employees who are currently working full-time as a merit employee who will be able to retire in 5 years or less. Current personnel runs indicate the following vacancies: Assistant Director (1), LPN (2), Disabilities Assistance/Driver (1), Security Officer (1), Administrator (1), Counselor (1), Instructors (2) and Specialists (3).

The **Kentucky Blind Enterprise Division** supervises the vendor program. They currently have 2 employees: Division Director (1) and Program Coordinator (1). Based on dates of employment an anticipated 27 years for retirement there are none eligible within the next 5 years. This division does have assistance from two temporary staff for clerical support and vending machine repair with positions open for Assistant Director (1) and Program Coordinator (1).

### III. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE STATE AGENCY TO PROVIDE VR SERVICES IN 5

YEARS BASED ON PROJECTIONS OF THE NUMBER OF INDIVIDUALS TO BE SERVED, INCLUDING INDIVIDUALS WITH SIGNIFICANT DISABILITIES, THE NUMBER OF PERSONNEL EXPECTED TO RETIRE OR LEAVE THE FIELD, AND OTHER RELEVANT FACTORS.

**Counselor Information:** Of the 124 counselors in the Division of Field Services there are 61 or 49% who are Certified Rehabilitation Counselors. Data since the merge on 10/01/2018 provides the following snapshot of current counselor experience within the agency. Those with 30 years of service or more were 2%. Those with 20 – 29 years of service were 8%. Those with 10 – 19 years of service were 29%. Those with 5 – 9 years of service were 27%. Those with less than 5 years of service were 34%.

**Personnel Departures:** There were a total of 30 classified employees that left the agency during this reporting period and 13 contractors. Of the classified employees 6 retired, 23 resigned and 1 was terminated. Eleven of these positions were counselors and 3 of them were certified rehabilitation counselors. The alarming trend for counselors is that there was 1 retirement, 1 termination and the remainder resigned for other positions. All counselors met the Kentucky standards for a qualified rehabilitation counselor. All 13 contractors resigned their positions.

**Personnel Hires:** There were 25 classified, 1 FFTL and 22 contract employees hired for a total of 48. Thirteen of the new hires were counselors and 3 have their CRC. The FFTL employee is an assistant and the contracted employees hold various support positions within the agency. Positions titles hired include: Assistants, Counselors, Consumer Service Coordinators, Cooks, Facility Administrator, Dorm Counselors, Employment Specialists, Instructors, Maintenance, Nurses, Receptions, Recreational Staff, Repair Technician, Security, and Work Experience Counselor. Some of the large quantity of new hires is a result of hiring contractors rather than merit employees. Contracted employees often have a higher turnover due to finding better employment or not being engaged in the work of the agency.

**Consumer Information:** There were 43,645 individuals served with the average cases served by caseload at 285 and the average potentially eligible cases served by caseload was 108. There were 2,903 individuals that exited the program successfully. The increase in caseload size is due to counselor vacancies. Case coverage was absorbed by other counselors and branch managers due to difficulty in filling vacant positions. The average caseload size for counselors located at CDPVTC was 54. As of this report the agency is serving categories 1 and 2. Effective April 1, 2020 OVR will open Category 3.

Based on years of services there are 8 staff within the Division of Blind Services that could retire in 5 years. Based on 27 years of service for predicted retirement there will be 5 employees who are currently working full-time as a merit employee in the Carl D. Perkins Center Division who will be able to retire in 5 years or less. The Kentucky Business Enterprise Division will have zero individuals eligible within the next five years. Over the next 5 years it is anticipated that 25 will be eligible to retire in the Division of Field Services based on service time with OVR calculating the retirement at 27 years

## 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 collaborates with the University of Kentucky. Staff attend advisory board meetings to encourage communication between the agencies. OVR counselors that do not have their MRC are encouraged to apply for scholarships when offered by the university. Information about scholarships and grants from UK and other universities with MRC programs are shared with staff through electronic announcements. The state agency no longer provides assistance for tuition or related costs of attending school due to the loss of the in-service training grant. The agency does allow participants who apply and are approved for an out-of-state MRC program to request approval to attend required on-campus sessions without taking personal leave. If approved by the cabinet the individual can travel to the locations without using annual leave, but the agency does not pay for travel expenses. Approval for out-of-state travel for these programs is not guaranteed and final approval is with the Education and Workforce Development Cabinet.

OVR has one staff person in the completion process for the MRC program at the University of Kentucky. The agency covers the cost of the CRC examination fee and continues to provide the renewal fee costs for all employees that maintain their CRC. In addition, the agency provides for the exam fees and renewal costs of other applicable certifications required for professionals to perform the functions of their job.

## 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. According to the information provided by the university, there were 85 students enrolled in fall 2018 with 15 graduates. In the spring 2019 there were 77 students enrolled in the MRC program. Of that spring number there were 31 that took the certification examination for rehabilitation counselors (CRC) and 22 passed or 71%. 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.

As stated, according to the information provided by the university, there were 85 students enrolled in fall 2018 with 15 graduates. In the spring 2019 there were 77 students enrolled in the MRC program. Of that spring number there were 31 that took the certification examination for rehabilitation counselors (CRC) and 22 passed or 71%. All of those who graduated achieved eligibility for licensure. OVR has one staff person in the completion process for the MRC program at the University of Kentucky. The agency covers the cost of the CRC examination fee and continues to provide the renewal fee costs for all employees that maintain their CRC. In addition, the agency provides for the exam fees and renewal costs of other applicable certifications required for professionals to perform the functions of their job.

## 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.

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.

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. Kentucky Personnel Cabinet utilizes a web-based system for hiring of personnel. The system uses online application submission and through a rigorous personnel process the applicants are vetted to ensure that they meet the required qualifications for the classification they are applying for.

In 2019 the agency hired and retained 13 VR Counselors in the Division of Field Services and those 13 individuals had achieved the following education levels: Master's degree (8) and Bachelor's Degree (5). All meet the classification requirements for a VR Counselor position within the state personnel system. This includes 2 years of required experience for those hired with BA only. The master's degree subject areas were: Rehabilitation Counseling (4), Psychology (1), Sociology (1) and Social Work (2). BA degrees were: Psychology (3), Human Services (1) and Social Work (1). There were 3 certified rehabilitation counselors.

OVR strives to achieve a more diverse workforce by working with state personnel systems to recruit and hire 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. Potential applicants are identified through recruitment, posting, and advertising according to the cultural diversity initiative and the agency's Affirmative Action goals. The following excerpts are from the Executive Branch Affirmative Action plan as it relates to personnel recruitment, development, and retention: (1) The Office of Diversity & Equality (ODET) will collaborate with the Division of Career Opportunities to develop innovative ways to increase the number of female and minority applicants for State government employment. (2) The Office of diversity & Equality will produce a Minority & Female Recruitment Resource Guide to share with the various cabinets and agencies and their recruiters. This guide will identify regional demographic information, along with up-to-date information on educational institutions, minority and female organizations, and other avenues for developing a diverse applicant pool. (3) All of the recruiting sources used by the State will be informed of the State's policy regarding Equal Employment Opportunity and will be asked to refer qualified candidates without regard to their race, color, religion, sex, age, national origin, disability, sexual orientation, gender identity, genetic information, or veteran status. In addition to these items, the Executive Branch Affirmative Action Plan also address selection and promotion through the following action items through professional development opportunities, new employee orientation includes information on Equal Employment Opportunity, Affirmative Action and Diversity and Cabinets/Agencies will encourage participation in the Governor's Minority Management Trainee Program.

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. As part of the personnel process the individuals within this program are exposed to varying aspects of job availability within state government. In addition, the GMMTP group is very actively involved in the Governor Leadership and Diversity Conference that takes place each year and representatives of the agency are also present to engage them in conversation regarding the available job opportunities within the Office of Vocational Rehabilitation. In 2019 the conference was more focused on providing attendees with information on working with individuals with disabilities and allowed for a platform to more robustly reach others regarding the services provided by OVR.

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 2019 that expressed an interest in participating in an internship with the OVR. Plans are being put into place by the University of Kentucky to revitalize this program to make it a more viable resource for the university and they have asked the state agency to work with them to insure opportunities for field experience, job shadowing and internship opportunities for participants in the program.

In addition to the above mentioned items, the following are also used for recruitment and identification of qualified candidates for vacant position and promotional opportunities:

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 meetings, national meetings.

Partners with human resources within the Personnel Cabinet and agency human resource division to hire the most qualified individuals and 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 and program development, service delivery, program monitoring activities and professional development to prepare for promotional opportunities when available.

Ensure that programs are accessible to minorities.

Encourage staff partnerships with local job fair opportunities throughout the state to broaden the recruitment for agency positions and educate high school and college students on the services and job opportunities within the agency.

Follow EEO guidelines and Affirmative Action Procedures.



Encourage minorities and individuals with disabilities to play an active role in the Office of Vocational Rehabilitation State Rehabilitation Council, participate in forums and provide input into policy and procedures.

Utilize Field 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.

OVR recognizes our staff as our greatest resource and is committed to training state personnel to ensure the provision of quality services to individuals for positive employment outcomes. OVR will remain current on rehabilitation trends and best practices and disseminate the information through internal training and by 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 has a personnel classification system in place, but it lacks salary competitiveness with other states and often other state agencies. 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. The agency is pursuing updates to the personnel classification series for counselors to more closely align to the outlined priorities in the Workforce Innovation Opportunity Act to recognize the experience that individuals have in working within the field of rehabilitation. On June 1, 2019 the Kentucky Personnel Cabinet updated the mid-range salary schedule for state employees. The agency is exploring how the mid-range increase may be used to create a more competitive salary to encourage employee retention. In addition, the agency is also exploring special entry rates for counselors and other measures allowable within the state government system that will generate salary increases for VR personnel.

The agency encourages the use of university 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. 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.

### 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) 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

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:

1. A Certified Rehabilitation Counselor (CRC) is preferred.

2. 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
3. Meets the Kentucky Personnel Cabinet standard to be certified as for the starting position of Vocational Rehabilitation Counselor, Grade 13. The Vocational Rehabilitation 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' 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.

Based on the above criteria of Vocational Rehab Counselor, all employed vocational rehabilitation counselors meet or exceed the criteria.

The following professional/para-professional certifications are considered primary within the agency. Staff qualifying for certification within the job classifications are assisted with maintenance fees. Those new qualifiers may receive assistance with examination fees based on one time pass or fail. Managers of VR Counselors are also required to meet the minimum qualified standards for their classification and are encouraged to obtain their CRC.

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)

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 and the Charles McDowell Center. 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
- Orientation and Mobility (COMS)
- 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 in the residential facilities must be contracted to provide specialized counseling services and those include;

- Licensed Clinical Social Worker
- Licensed Alcohol and Drug Abuse Counselor
- Licensed Psychologist.

**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. At the end of 2019 there were 124 counselors in the Division of Field Services and 3 additional located at the Carl D. Perkins Vocational Training Center Division (CDPVTC). Of those from Field Services there were 61 or 49% who were Certified Rehabilitation Counselors (CRC) and of the 3 at CDPVTC there are 2 CRC's. Of the new hires for 2019 there are 4 that will not meet the required standard of Vocational Rehabilitation Counselor until they complete their probation period. Their probation ends as follows: October (1), December (2) and January 2020 (1). There are 97% of Vocational Rehabilitation Employees in the field that meet the required standard for the agency. All 4 of the Vocational Rehabilitation Counselors (3) located at the Carl D. Perkins Vocational Training Center meet the required personnel standard.

The VR Counselors in the field have the following educational backgrounds:

20 with Bachelor's degree only: Rehabilitation Counseling (1), Psychology (9), Social Work (6), Human Services (2) and Sociology (2). The remaining 105 have a master's degree in Special Education (3), Sociology (3), Social Work (13), Rehabilitation Counseling (64), Psychology (3), Public Administration (1), Mental Health (1), Human Services (2), Human Development (1), Family Counseling (1), Education (1), Deaf Education (2), Criminal Justice (1), Human Development and Leadership (1), Counseling (6), and Clinical Psychology (2).

Of the managers supervising the VR Counselors, there are 19 total and of that number all meet the qualifying standard for their classification. In addition, 17 are Certified Rehabilitation Counselors and the remaining 2 have their master's degree in rehabilitation counseling.

In addition to the above referenced counselors and managers, the agency also has 30 other employees that maintain their CRC and supports them in the maintenance of this certification. This includes: Administrators (9), Assistant Director (1), Program Branch Managers (2), Community Resource Specialist (1), Deputy Executive Director (1), Division Directors (2), Employment Specialists (4), Instructor (1), Psychologist (1), Regional Managers (5), Rehabilitation Technologists (2) and work Experience counselor (1).

The agency Rehabilitation Technology Branch provides assistive technology services to the field for consumers as well as to employees as needed. There are 13 employees in this branch including the manager. The branch manager is certified as an Assistive Technology Professional (ATP). Upon merging with the Kentucky Office for the Blind all assistive technology providers, merit employees (6) and contracted employees (7) were combined in one branch. Certified staff within the branch include: ATP, Certified Driver Rehabilitation Specialist and Durable Medical

Equipment Specialist. The agency hosts an annual AT Summit to provide specialized training to staff in this branch and opens the training to other staff within the agency. In addition, staff in this branch provide training to new employees on the ADA, processes within the agency for AT requests and general AT training reviews.

The Carl D. Perkins Vocational Training Center (CDPVTC) has unique staffing needs based on the services they provide to consumers and their residential structure. In 2019, CDPVTC employed 94 personnel to provide services in the residential facility. There are 3 VR Counselors on site and all meet CSPD standards for the agency and 2 are CRC. The supervisor of these counselors is also a CRC. The counselors do not determine eligibility, but do help with planning and monitoring of vocational goal progress. Other personnel staffing classifications for CDPVTC include; vocational evaluators, dorm staff, maintenance personnel, security officers, financial specialists, instructors, certified drivers and medical personnel to meet the diverse needs of the students served in this residential setting.

The Charles McDowell Center provides services unique to individuals with visual disabilities. The Facility Administrator supervises staff at the McDowell Center including: Administrator (1), Assistants (3), Community Resource Specialist (1), Consumer Services Coordinator (1), Instructor (4), Nurse (1), Patient Aide (1), Psychologist (1), Receptionist (1) a Work Experience Counselor (1), Tech Support (2), Dorm Residential Aide (3 and all are contracted) and 1 maintenance person (contracted).

With the merging of the agencies, the two facilities are exploring new opportunities to share expertise and services for all consumers. Staff are trained on services provided by each facility and how to access these for their consumers. This includes tours of the facilities for a better understanding of the unique services provided at each location.

#### 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. A SYSTEM OF STAFF DEVELOPMENT FOR PROFESSIONALS AND PARAPROFESSIONALS WITHIN THE DESIGNATED STATE UNIT, PARTICULARLY WITH RESPECT TO ASSESSMENT, VOCATIONAL COUNSELING, JOB PLACEMENT, AND REHABILITATION TECHNOLOGY, INCLUDING TRAINING IMPLEMENTED IN COORDINATION WITH ENTITIES CARRYING OUT STATE PROGRAMS UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998; AND

The 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. Training plans are based on: federal laws, RSA monitoring findings, agency goals and directions, continuous improvement initiatives, training needs assessment, staff and consumer input. The agency utilizes both in-person and online resources for training.

In October 2018 the agency hosted a statewide training to address the merger of the Kentucky Office for the Blind and the Kentucky Office of Vocational Rehabilitation. Agency leadership guided the development of the training agenda that included: Understanding the Merge/What it Means to Me?, Dual Cases, Order of Selection and Eligibility, Order of Selection and Individualized Plan for Employment, Approval Processes and Service Fee Memorandums. In July 2019 the agency provided a follow-up training to address specific training questions for the Rehab Counselor for the Blind as it related to providing services for dual cases including an update of disabilities other than those vision related.

Onboarding for the State of Kentucky, Education and Workforce Development Cabinet and Office of Vocational Rehabilitation now includes web based trainings more timely engagement. All of the required trainings must be completed within 30 days of employment. These include: Anti-Harassment, Workplace Violence Prevention, State Government Ethics, Security Awareness for Technology, Performance Evaluation Orientation and Accurate Time Reporting. New employees are also required to take an online training on the Client Assistance Program (CAP) developed by the coordinator of that service. The training provides an overview of the services provided to consumers and processes for consumers to enlist the services of CAP if needed.

New employees are mandated to attend a face-to-face training for onboarding. As part of the orientation process, the agency utilizes subject matter experts from within the agency to deliver the training. The subject matter experts include the Division of Field Services Director, Division of Field Services Assistant Director, Division of Field Services Regional Manager, Employer Services Branch Manager, Rehabilitation Technology Branch Manager, Social Security Administrator and members of the counselor mentoring program. The topics covered are: the agency mission, philosophy, values, federal and state laws, appropriations, budget, eligibility, assessment, vocational goal development, plan development, pre-employment transition services, community based work transition services, confidentiality and ethics, supported employment, assistive technology (based on the Assistive Technology Act of 1998), diversity, disability awareness, Social Security Administration (SSA), Ticket to Work, Workforce Investment Opportunities Act (WIOA) specific disabilities. Training programs for all staff emphasize informed consumer choice and maximizing consumer direction of individualized rehabilitation plans. Information regarding to current research is disseminated to all staff via email and formal training opportunities. This training occurs at least 2 times during the calendar year and more if needed based on hiring of new staff.

In addition to the formal training opportunities, the new counselors within the agency also have the opportunity to receive training and guidance from an OVR Counselor Mentor. The rehabilitation counselor mentoring program was implemented in June 2002 with pilot programs in six districts. The pilot program was a success and has been active since the completion of the pilot in 2003. Currently there are 22 counselors actively involved in the program. There is a team that oversees the training development and policies associated with this program. The team consists of an administrator from central office, a field manager and appointed counselor mentors with successful experience mentoring agency counselors. When the Office of Vocational Rehabilitation and the Office for the Blind merged in October 2018 there was an immediate need to open the existing mentor program to the Rehabilitation Counselors for the Blind (RCB). There is currently one RCB that has applied, been accepted and is now serving on the mentoring team to assist with the specific training needs of RCB's within the agency. She is an experienced counselor and was formerly with the Kentucky Office for the Blind. In the absence of certified mentors in a district, the branch manager serves as the mentor or delegates the duties to one of the senior counselors. There are 13 out of 19 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' and prepares them to assume other leadership roles within the agency.

The agency utilizes webinar trainings to deliver training to new employees when it is an appropriate method for the topic. In 2019 the online training programs includes: Assistive Technology, Driver Tech Processes, Case Management, Case Management System, Kentucky Business Enterprise Vendor Program Training, Introduction to Eligibility and Introduction to

IPE. These trainings were recorded to be utilized with all new employees. Platforms that are accessible to all are utilized for webinars and online training.

Managers are encouraged to arrange for new counselors to visit the Carl D. Perkins Vocational Training Center and the Charles McDowell Center for an in-person opportunity to review their programs and the facilities so that they can accurately relay this information to consumers on programs appropriate for the achievement of their vocational goals.

In addition to the above named online training programs, all CDPVTC employees are required to take training programs online to fulfill the requirements for their Commission on Accreditation of Rehabilitation Facilities. These trainings include: Identification of Critical Incidents, Promoting Wellness of Consumers, Reporting Abuse & Neglect of Vulnerable Adults and Consumer rights.

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. OVR administers the KATS Network, the Commonwealth's Assistive Technology program.

The agency 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.

The agency also encourages staff to utilize the training offered through other entities 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. Topics of 2019 included: Universal Design, Employment for Youth with Disabilities, Service Animals and the ADA and Disabilities and the Arts. The agency worked with HDI on their first Annual Assistive Technology Summit in March 2019. A multi-agency collaborative training took place in April 2019 titled "Nothing About Us Without Us" hosted by the University of Kentucky, HDI, Kentucky Autism Training Center, the Office on Autism and OVR. In addition, information is disseminated to all staff for 4<sup>th</sup> Thursday ADA topics provided through HDI that include such topics as: AT as a Reasonable Accommodation, ADA & Employment, ADA & Public Accommodations, A Snapshot of the ADA: The Legislations and History of the Disability Movement.

College and university level classes are highly encouraged for staff though the agency does not provide educational assistance at this time. Obtaining an education degree may result in a reclassification if the reclassification is a result of additional material duties assumed by the employee. The agency shares information with staff regarding formal educational training such as the MRC. Included in the information are details about scholarships and grants that may be available to assist with educational expenses. The agency maintains a library of MRC books that have been donated by previous participants and makes these available to staff as needed.

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 including the training resources available through the Office of Diversity Equality and Training

(ODET) in the Kentucky Personnel Cabinet. Examples of approved and required courses include: Foundations of Leadership, Coping with Difficult Behaviors, Conflict Management, Hiring and Selection Process, Managing Employee Performance, Leadership Communication, Managing Work Relationships, Personal Accountability and Shared Accountability.

Agency staff are encouraged to participate in the Leadership and Diversity Conference hosted by the Kentucky Personnel Cabinet Office of Diversity Equality and Training. The most recent training took place in September 2019 and had a greater focus on disability specific information than in past years. Topics included: Creating Accessible Documents, Using the Job Accommodation Network, The Role of the ADA Coordinator and the keynote address was given by an athlete with a hearing disability. All of the agency leadership attended the training as well as some staff from the field that requested to attend.

#### B. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO DESIGNATED STATE UNIT PROFESSIONALS AND PARAPROFESSIONALS.

Resources on research and national training/communication on trends and updates in the field of rehabilitation are shared with all staff via email. The agency subscribes to emails distribution lists that provide frequent updates on rehabilitation research to share with staff.

OVR makes every effort to have representation at and participate in national and regional and state training events. In 2019 OVR staff represented the agency at the following: National Rehabilitation Association Annual Conference, Southeast Region National Rehabilitation Association Conference, Kentucky Rehabilitation Association Annual Conference, Kentucky Association of Persons for Supported Employment Conference, Kentucky AHEAD and Southeast Rehabilitation Institute on Deafness (SERID).

#### 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 is committed to establishing and maintaining practices that ensure that existing staff is trained and knowledgeable of resources to assure consumers receive the appropriate modes of communication. In order to address the diverse individual cultural needs of individuals OVR has designated counselors with specialized skills assigned to handle caseloads serving individuals who are deaf, deaf/blind, blind and visually impaired. Recruitment of individuals with specialized skills occurs utilizing the Kentucky Personnel Cabinet through their online jobs portal. Classifications for these positions specifically outline the necessary skills required to fill the position.

The Deaf and Hard of Hearing Services Branch actively provides internship opportunities for students graduating from the American Sign Language program at Eastern Kentucky University. This gives the graduates a chance to learn and gain exposure to working within the state agency as an employee or serving as in an ASL contracted employee for the state. In addition, existing staff in the agency who are interested in broadening their skills are encouraged to apply for positions that they aspire to. Advertisements for vacancies are distributed via email to all staff to insure that they are aware that such vacancies exist. Communication specialists are recruited from within the existing agency counselor group and provided with the necessary training to provide services to individuals who are hard of hearing.

The Rehabilitation Counselors for the Deaf (RCD) have sign language skills and the Rehabilitation Counselors for the Blind are trained on the unique communication needs of their consumers. Some of their training occurs prior to hiring, but the agency provides ongoing support for participation in opportunities for professional development in the specialized areas to insure that staff maintain/update their skills. In addition, both groups are trained to coordinate together on services for individuals who are deaf/blind. The agency also employs a deaf/blind statewide administrator dedicated to service provision for deaf/blind consumers. The agency has a strong working relationship with the Helen Keller National Center as additional support for services provided to consumers who are deaf/blind. All counselors work with 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. These individuals have received specific training to meet the needs of consumers who are hard of hearing. At the end of 2019 there were 59 Vocational Rehabilitation Counselors trained and designated as Communication Specialists. The agency maintains a personnel database that easily identifies the counselors approved as communication specialists.

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.

As meetings, webinars and online training opportunities increase, the agency utilizes platforms that are accessible for staff. ASL interpreters are included. Trainers are coached to provide descriptive wording for visual elements to insure those with visual disabilities can fully participate in the training.

When language and communication needs exist for consumers that are beyond the scope of personnel resources within the agency or with the state government as a whole there are additional measures employed to insure that individual have necessary access. These include, but are not limited to the following:

American Sign Language interpreters are available on staff, but due to high demand the agency will contract with outside resources as needed to insure the communication resources are available. The services for outside vendors for ASL are coordinated through our Deaf and Hard of Hearing Branch.

Foreign Language Interpreters are contracted as necessary to ensure that individuals who are from diverse cultural backgrounds in need of interpreters to access services will be able to communicate in their native languages. Language access lines are available to staff to utilize for interpreting needs.

Voice Description and captioning 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, electronic format, 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.

OVR also has used a language telephone interpreting service that is available to all staff across the state. This enable staff to effectively communicate with individuals who walk into OVR offices without an appointment and who do not speak English. OVR works with vendors across the state that can provide qualified foreign language interpreters as well as written translation.



This enables OVR to arrange for in-person interpretation when meeting one-on-one with a non-English speaking individual, and allows OVR to provide written reports in their native language upon request.

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

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

As 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 and the Department of Education are two of the eleven 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

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 conducted in 2018. 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. The current assessment was conducted jointly in 2018 with both KYOVR and KYOFB 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 (2018) 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 in 2018 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 conducted in 2018 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 conducted in 2018, 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 indicated they were not sensitive to issues, did not have enough skilled staff or they did not provide appropriate technology or orientation and mobility training. OVR/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](http://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 present were optometrists and only five present 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/KYOVB 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.

As a result of the findings in the Comprehensive Statewide Needs Assessment (CSNA), the OVR CRP Branch has extensively sought out internal and external training opportunities for CRP's to expand their knowledge base for individuals with serious mental illness, Autism, deafness, hard of hearing, blindness, visual impairments, and learning disabilities. The OVR Branch requires 15 hours of continuing education units (CEU's) for all employment specialist that provide supported employment services. Therefore, the Branch makes every attempt to explore training opportunities that aides in meeting the CEU requirement as well as meeting training needs expressed by CRP's. OVR has provided extensive training on individuals who are deaf-blind, blind, deaf, and/or hard of hearing as well as training on Assistive Technology and other adaptive equipment.

As indicated in the CSNA, one of the most problematic issues impacting service delivery is CRP staff turnover and sustainability. The OVR CRP Branch addressed this issue by studying and modifying the payment mechanism by which CRP's are paid. Overall, SE payments were increased and are now dispersed incrementally based on achieving milestone outcomes. Previously, payments for a successful outcome were made at 60-days, and now milestone outcome payments are made at 30, 60 and 90 days. Employment & Retention service payments are made at day 1, 45 and 90. Additionally, increases were made to all models of supported employment, which include Traditional, Individual Placement and Support (IPS), and Customized Supported Employment (CSE). Finally, additional increases were also made to Pre-ETS services. In conjunction with these service rate increases, the OVR also conducted multiple meetings with CRP agencies to discuss effective strategies to increase the likelihood of sustainability.

One major focus area is that of Customized Supported Employment. In addition to the CSNA, OVR conducted an internal survey to indicate the need for CSE, which supported the findings in the CSNA. As a result, the OVR was able to request proposals from CRP non-profit agencies who expressed interests in expanding or developing CSE in underserved areas and/or underserved populations. This effort resulted in contracts with four CRP's who are now working toward the development and sustainability of CSE services in high need areas.



When updates to policies and procedures, training occurs for CRP's and OVR staff to ensure a clear understanding of processes and protocols are followed. This allows for a more expeditious service delivery process. The CRP Branch continues to closely monitor CRP's as it relates to their ability to meet expectations that are outlined in their CRP Agreement. This ensures that documentation of services is of high quality and also submitted in a timely manner.

**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.

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

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. This data reinforces the results of the 2018 CSNA for this area.

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. 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.

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. Additionally OVR 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.

The Executive Director of the Office of Vocational Rehabilitation (OVR) serves as a voting member of the State Interagency Council (SIAC) for Services and Supports to Children and Transition-Age Youth. The Executive Director or a designee attends monthly SIAC meetings to gain information and collaborate on the matters of the council as it relates to youth who are Kentucky students with disabilities. During a SIAC meeting that was held on July 18, 2018 OVR did a presentation to educate the council and it's meeting attendees about OVR's Pre-Employment Transition Services (Pre-ETS) for students with disabilities who are between the ages of 14 and 21. The monthly SIAC meetings gives OVR the opportunity to assess needs, gain information as well as collaborate, plan and develop on going partnerships with other state agency representatives who serve mutual individuals with disabilities.

Regional OVR representation has been established for the Regional Interagency Councils (RIAC) for the system of care to have consistent OVR representation. An OVR regional representative attends monthly RIAC meetings to establish partnership with state, public and community agencies to address concerns that families have within the regions of Kentucky. OVR regional representation supports the momentum of the system level work that is occurring statewide. Strategies are set in place to promote children's social and emotional needs where they live, learn, work, and play by sharing information on the available services that is within the regions of Kentucky. Priority areas includes:

- Outreach and Promotion,

- Disparities and Disproportionate Minority Contact
- Social and Emotional Health

OVR and Kentucky Department of Education continues to meet regularly with interested interagency partners and serve as the catalyst for development and implementation of an infrastructure which supports youth with disabilities to transition from high school to post-secondary school and employment. Pre-Employment Transition Services will continue to represent the earliest set of services available under OVR for students with disabilities, which are short-term in nature and are designed to help students identify career interests. This group as identified the following areas to focus on: 1) Cohesive and consistent service delivery among partners inclusive of community work transition, special education cooperatives, community rehabilitation providers and OVR staff and 2) Data Sharing.

OVR has an agreement with the KDE for transition planning and service delivery for secondary students with disabilities. This agreement is in the process of being rewritten to meet the requirements of WIOA . 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.

OVR has three Vocational Rehabilitation Administrators that work closely with Kentucky Department of Education Staff on an administrative and local level. Each one specializes in a particular area of transition or pre-employment transition services having the primary responsibility of ensuring the effective delivery of VR services to students and youth with disabilities, as well as individuals with behavioral health needs and development disabilities. The three VR administrators will be responsible for the administration of pre-employment transition services, community work transition Services and services to specialized populations such as deaf and hard of hearing, deaf/blind and blind and the visually impaired). Each serve as a point of contact for their area and assure services are administered in keeping with the federal guidelines and in compliance with state and federal laws. They represent the agency on state and federal teams, boards and commissions for the area of transition and pre-employment transition services.

## 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.

According to data from the 2018 American Community Survey (ACS), published in the annual Compendium of Disability Statistics, 17.04% of Kentucky civilians living in the community report having a disability. Overall, this rate has remained pretty steady since 2013. It was lowest in 2013 at 16.8%. According to this resource, Kentucky's overall population is 4,357,195 people. Using the percentage in 2018 and applying it to the population numbers, there is an estimated 758,234 people in the state of Kentucky who have a disability as of 2018. The employment rate for people with disabilities in Kentucky was 29.4%. 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 2020 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 2020 and it is inclusive of the carryover of consumers from the prior year. The information reflects the estimated numbers taking into consideration that in FFY 2019 Category One and Two were open and there was an increase in staffing levels.

Estimated number to be served in FY 2020 under the combined agency is 23,588 with 2,756 positive employment outcomes. The estimated number to be served in FY 2021 under the combined agency is 23,670 with 2,780 positive employment outcomes. The numbers for FY 2020 and FY 2021 take into account that Category One and Two were open and the agency opened Category Three effective April 1, 2020 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 FY 2020 estimates that it will serve around 3,477 individuals with a total estimated associated costs of around \$3,584,943. In FY 20 we estimate around 584 employment outcomes with an average estimate of around \$1,170,440. For FY 2021, OVR estimates that it will serve around 3,560 individuals with a total estimated associated costs of around \$3,670,360. In FY 21 we estimate around 620 employment outcomes with an average estimated costs of around \$1,271,617.

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 2019 and year to date 2020. 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 Category One, Two and Three open (Category 3 opened effective April 1, 2020) leaving only Category Four closed. 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.

The number below are for Fiscal Federal year October 1, 2019 through September 30, 2020. The total number estimated to be served is 23,588 with 2,756 positive employment outcomes.

Estimated number to serve under Category One is 19,290 with 1,971 successful employment outcomes.

The estimated number to serve under Category Two is 2,931 with 496 successful employment outcomes.

The estimated number to serve under Category Three is 1,327 with 283 successful employment outcomes.

The estimated number to serve under Category Four is 40 with 6 successful employment outcomes.

The numbers below are for Fiscal Federal year October 1, 2020 through September 30, 2021. The total number estimated to be served is 23,670 with 2,780 positive employment outcomes

Estimated number to serve under Category One is 19,300 with 1,992 successful employment outcomes.

The estimated number to serve under Category Two is 2,952 with 498 successful employment outcomes.

The estimated number to serve under Category Three is 1,383 with 284 successful employment outcomes.

The estimated number to serve under Category Four is 35 with 6 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 June 11, 2020, there were 8 individuals on the waitlist in Category Four. OVR opened Category Three on April 1, 2020 and all individuals on the waiting list at that time were moved to active status. OVR has only Category Four (closed).

### 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.

**These costs are reflective of the estimated direct service costs to consumers for the fiscal year October 1, 2019 through September 30, 2020**

FY 2020

Category One

Estimated to be served — 19,290

Total Estimated Associated Costs – \$16,955,845  
Average Estimated Costs per person per closure - \$2,847  
Estimated Employment Outcomes —1,971

Category Two Estimated to be served — 2,931  
Total Estimated Associated Costs - \$1,327,975  
Average Estimated Costs per person per closure - \$979  
Estimated Employment Outcomes - 496

Category Three Estimated to be served — 1,327  
Total Estimated Associated Costs - \$555,334  
Average Estimated Costs per person per closure - \$1,121  
Estimated Employment Outcomes - 283

Category Four Estimated to be served - 40  
Total Estimated Associated Costs — \$26,822  
Average Estimated costs per closure: \$1,083  
Estimated Employment Outcomes: 6

FFY 2021

The costs are reflective of the estimated service cost to consumers for the fiscal year October 1, 2020 through September 30, 2021. Estimated number served is 23,670 with 2,780 positive employment outcomes.

Category One

Estimated to be served — 19,300  
Total Estimated Associated Costs - \$16,964,635  
Average Estimated Costs per person per closure - \$2,975  
Estimated Employment Outcomes —1,992

Category Two

Estimated to be served — 2,952  
Total Estimated Associated Costs - \$1,337,490  
Average Estimated Costs per person per closure - \$980  
Estimated Employment Outcomes - 498

### Category Three

Estimated to be served — 1,383

Total Estimated Associated Costs - \$578,769

Average Estimated Costs per person per closure - \$1,115

Estimated Employment Outcomes - 284

### Category Four

Estimated to be served - 35

Total Estimated Associated Costs — \$19,974

Average Estimated costs per closure: \$994.00

Estimated Employment Outcomes: 6

## L. STATE GOALS AND PRIORITIES

The designated State unit must:

1. 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. The newly appointed Council for the Combined agency agree upon the established goals.

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:



**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. OVR is in process of the design and conducting of the 2021 Comprehensive Statewide needs Assessment. 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.

**B. THE STATE'S PERFORMANCE UNDER THE PERFORMANCE ACCOUNTABILITY MEASURES OF SECTION 116 OF WIOA; AND**

OVR submitted the second WIOA annual Performance Report on October 1, 2019 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 in process of the procurement of a system that will collect, track, measure and report data needed under section 116 of WIOA. Currently, the workforce partners use different systems and tracking mechanisms. The current Kentucky OVR Case Management System (CMS) is 15 years old. OVR is in process of procuring a new system. The new system(s) should allow OVR 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.

Core programs and partners have access to a business customer relationship management system based on a Salesforce platform. Phase 1 allowed shared access to employer contacts and business needs, and Phase 2 gave the partnership the ability to add and assess employer programs and resources. This platform allows the tracking of business engagement and reporting for the aligned goal of furthering business services, and is the tool that encompasses the Kentucky Integrated Business Engagement System (KIBES). This allows for tracking of the Employer measures.

**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 OVR. 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.

OVR has four priority service categories with Priority Category One, Two and Three open and Four closed. Priority Category Two was opened on February 18, 2019 and Category 3 opened effective April 1, 2020.

The following is Kentucky's order of selection for the combined agency:

Priority Category 1

Priority Category 2

Priority Category 3

Priority Category 4

For FFY 2020, priority category 1, 2 and 3 will receive services under the order. KYOVR opened priority category 3 effective April 1, 2020. OVR will continually monitor influencing factors to determine if individuals on the waitlist (priority category 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 FY2020 and beyond.

According to data from the 2018 American Community Survey, published in the annual Compendium of Disability Statistics, 17.4% of Kentucky civilians living in the community report having a disability. This is higher than the national average of 12.7%). The employment rate for individuals with disabilities in Kentucky was 29.4%. In comparison the national rate for individuals with disabilities 18 – 64 years that were employed was 37%. Kentucky percentage of individuals who fall below the poverty line at 34%. (8% higher than the national rate of 26%). According to the Social Security Administration, in 2017, 19.7% of Kentuckians receive blind and disabled Supplemental Security Income benefits. The Institute for Community Inclusion (ICI), in 2016, reported the percentage of SSI recipients in Kentucky who were working was 2.9%. 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 2019 and year to date FY2020, agency staff along with fiscal and the State Council of Vocational Rehabilitation 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 2019 and year to date in 2020 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 2019 OVR continues its efforts in maintaining administrative costs to a minimum. The decision was made to open Priority Category Two in February of 2019 and OVR will open Category Three effective April 1, 2020 leaving only Category Four closed.

### C. THE SERVICE AND OUTCOME GOALS

The numbers below outline the current service population numbers and costs. Service Numbers and costs for 2020 and 2021 and are estimated based on historical data and 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.

The estimated year end actual outcomes and costs are reflective of the program year for July 1, 2018 through June 30, 2019 in order to match the federal program year under WIOA for quarterly reporting. The following FY 2020—2021 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 2020 SERVICE GOALS and OUTCOMES:

Priority Category I Active Cases GOAL: 18,146 Outcomes GOAL: 1,986

Priority Category 2 Active Cases GOAL: 3,541 Outcomes GOAL: 467

Priority Category 3 Active Cases GOAL: 1,824 Outcomes GOAL: 293

Priority Category 4 Active Cases GOAL: 47 Closed Outcomes GOAL: 10

TOTAL Active Cases GOAL: 23,588 Outcomes GOAL: 2,756

SERVICE COSTS ESTIMATE FY 2020: 18,500,500 \* Includes Case Service, Guidance and Counseling, Public Community Rehabilitation Programs and Placement Costs

#### FY 2021 SERVICE GOALS:

Priority Category I Active Cases GOAL: 18,200 Outcomes GOAL: 2,000

Priority Category 2 Active Cases GOAL: 3,550 Outcomes GOAL: 475

Priority Category 3 Active Cases GOAL: 1,850 Outcomes GOAL: 300

Priority Category 4 Active Cases GOAL: 100 Closed Outcomes GOAL: 25 TOTAL

Active Cases GOAL: 23,700 Outcomes GOAL: 2,800

### D. TIME WITHIN WHICH THESE GOALS MAY BE ACHIEVED FOR INDIVIDUALS IN EACH PRIORITY CATEGORY WITHIN THE ORDER; AND

#### FY 2020 YEAR END ESTIMATED OUTCOMES

##### TIMEFRAMES

#### 10/1/19 THROUGH 9/30/21 YEAR END ESTIMATED OUTCOMES

Priority Category One - # served 19,290 and 1,971 positive employment outcomes (2 years from application to closure)

Priority Category Two - # served 2,931 and 496 positive employment outcomes (3.5 - 4 years from application to closure)

Priority Category Three - # served 1,327 and 293 positive employment outcomes (4 - 4.5 years from application to closure).

Priority Category Four - # served 47 and 6 positive employment outcomes (2 years and less from application to closure).

#### FY 2021 YEAR END ESTIMATED OUTCOMES

##### TIMEFRAMES

10/1/20 through 9/30/21

Priority Category One - # served 19,300 and 1,992 positive employment outcomes (2 years from application to closure)

Priority Category Two - # served 2,952 and 498 positive employment outcomes (3.5 - 4 years from application to closure)

Priority Category Three - # served 1,383 and 284 positive employment outcomes (4.5 - 5 years from application to closure).

Priority Category Four = # served 35 and 6 positive employment outcomes (2 - 2.5 from application to closure)

#### E. HOW INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES

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 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. 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 Community Rehabilitation Branch, will assure choice and quality services for its consumers served in supported employment by:

- a. thoroughly reviewing all applications for Supported Employment vendorship;
- 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

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.

- 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. For example, an enhanced fee for Vocational Profile development has been developed, piloting and expansion of new programs through Memorandums of Agreement (MOAs), and training providers in the use of strategies for individualized services specific to customized employment.

**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**

In order to provide some context to our analysis of the needs of individuals with disabilities, 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. The strategies listed in 0.8 align with the following Priorities for the agency:

**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**

**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**

The strategies listed in Section 0.8 of this plan were developed for the established goals and priorities with the input of the State Vocational Rehabilitation Council. 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 an interest in, or contact with AT.

OVR administers 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.

Rehabilitation Counselors for the Blind (RCB) work with AT Specialists and the McDowell Center for the Blind's AT instructors to provide necessary assistive technology used by individuals who are blind or visually impaired, such as laptop computers, tablets, braille writers, pocket recorders for notetaking, closed-circuit televisions to magnify documents, hand-held magnifiers, and computer software including screen readers and magnification (Zoomtext), speech (JAWS, WindowEyes) and Braille displays. AT Specialists work closely with employers to ensure that consumers have the tools and training necessary to perform jobs in a wide variety of settings, such as customer service call centers, law firms, universities, and utility companies.

The Office 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 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. 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.

Individuals who are minorities have equal access to vocational rehabilitation services. OVR is committed in its effort to build the capacity to effectively service 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, sexual orientation, disability or age. The Agency assures the provision of services to American Indians who are individuals with disabilities residing in the state to the same extent as it provides services to other significant populations or individuals residing in the state. The following outlines the actions in OVR's outreach plan for 2020 - 2021:

Management and staff shall focus on the agency mission, which is 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 provide leadership in implementation of the Career Center Systems throughout the Commonwealth. Staff shall ensure that persons with the most significant disabilities who are minorities will receive the same employment related services than non-minorities and individuals with disabilities receive.

Recruit and hire Rehabilitation Counselors from minority and culturally diverse groups.

Improve system linkages with the Department of Workforce in order to reach more minorities across the state. Collaboration with other entities will allow for effective coordination of services and referrals.

Integrate internal controls through quality assurance to identify areas where there is successful outreach and best practices and identify areas needing additional outreach.

Develop outreach activities to minorities to facilitate increased consumer referrals to OVR. OVR supports staff in making linkages with community leaders and minority organizations to facilitate outreach.

Encourage existing minority staff to play an active role in policy and program development, service delivery and program monitoring activities.

Provide cultural diversity training to staff in order to develop a better understanding of different cultures and value systems.

Utilize service demographic and population data to determine the number of minorities in regions and develop strategies to increase percentages.

Encourage minorities to play an active role in the State Rehabilitation Council, participating forums and the provision of input into policies and procedures.

#### 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)

In Kentucky there are 173 school districts consisting of 1,233 schools. There are a total number of approximately 26,000 students with IEPs that are potentially eligible in the state according to the Kentucky Department of Education. Currently, the Department of Education has no way to count the number of students with 504 plans or those who would qualify as a student with a disability that do not have an IEP or 504 plan. The number of students in private or home schools that would qualify as students with disabilities is also not readily available.

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.

As stated earlier in this section, 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.

OVR uses the strategic planning process as one of its methods to ensure the effective implementation of 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.

In November of 2019, the Workforce Innovation Technical Assistance Center (WINTAC) pre-employment transition staff team came on site to Kentucky to conduct a Strategic Planning Meeting with OVR leadership. OVR leadership completed a SWOT analysis and worked with WINTAC staff in completing a statewide strategic plan for Transition Services in Kentucky. During the session, WINTAC staff led us through a discussion of OVR's current delivery system, the SWOT analysis and a development of a plan with actions, roles and responsibilities. WINTAC staff participate in monthly call with OVR staff in the implementation of the plan. Specific OVR

staff are assigned to tasks under the plan. The team consists of the Director of Field Services, Assistant Director of Field Services and the VR program administrators for pre-employment and transition services. Under the plan OVR has the following priority goals:

Priority 1) Evaluate current Service Delivery

Review Vision and Mission

Establish common vision with buy – in from all partners

Develop a plan of communication for OVR staff

Priority 2) Development of pre-employment transition policies and internal controls

Conduct a SWOT analysis of how services are currently delivered

Baseline/ Mapping of services

Develop surveys for field staff

Review existing examples and develop student outcomes and expectations for the five required services

Analyze all contract and service fee memorandums

Review examples of pre – employment policies and internal controls from other states.

Develop procedures/internal controls

Ensure Pre – employment transition services reflect internal controls

Priority 3) Share Consume Stories and Data

Collect Consumer Stories

Review of data for reporting and telling the stories

Development of materials for publishing and sharing

The Office of Vocational Rehabilitation is currently in process of a request to create and establish a Branch in the existing office structure for Transition. The Transition Branch will be established in order to ensure the effective delivery of VR services to students and youth with disabilities, as well as individuals with behavioral health needs and development disabilities. This new branch will administer statewide transition and pre-employment transition services. This will require statewide collaboration with workforce and education partners. This Branch will be responsible for:

1. Collaborates across workforce programs to facilitate employment services delivery to youth with disabilities and other underserved populations.
2. Formulates, develops and interprets policies, standards and procedures.
3. Maintains a comprehensive knowledge of and assures that OVR adheres to all Federal and State Regulations, administrative rules and policies for transition and pre-

employment transition services.

4. Assists in the evaluation of the effectiveness of agency transition policies and procedures.
5. Coordinates the activities of transition/Section 511.
6. Coordinates the activities of Pre – Employment Transition Services.
7. Facilitates the development and maintenance of agency fee schedules and cooperative agreements.
8. Collaborates regularly with partners by participating in workforce partner meetings, community rehabilitation, OVR team meetings, vendors/contractors and Department of Education staff.
9. Facilitates effective communication with the Executive Leadership, Field Services Management and field staff to assure the attainment of agency goals.
10. Represents the agency by participation and representation on Transition Related events and Councils.

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 develop 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) a Disabilities Model Demonstration Program Grant (CFDA 84.235N). This federal grant provided through the Rehabilitation Services Administration (Department of Education) created 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) is in its final year. At this time the advisory team is working on a succession strategy to ensure that the work on this project continues. OVR and the partners on the grant want to ensure 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.

Under CASE, the Career Pathways Coordinators have established working relationships with schools and provided training for staff and students for the area of career pathways for local sector areas. Hands on training occurred for students through STEM Camps at the local Technical and Community Colleges. Instructors were able to provide information about Labor Market Information including expected pay rate, benefits, and employers that have hired their graduates. Students that may have never considered post-secondary training were now aware of options to make better informed choices about their career goals entering VR services.

As stated in other sections of the plan OVR has representation and involvement in several organizations and councils as follows:

OVR) was appointed to serve as a voting member of the State Interagency Council (SIAC) for Services and Supports to Children and Transition-Age Youth.

Regional OVR representation has been established for the Regional Interagency Councils (RIAC) for the system of care to have consistent OVR representation.

OVR and Kentucky Department of Education continues to meet quarterly with interested interagency partners and serve as the catalyst for development and implementation of an infrastructure which supports youth with disabilities to transition from high school to post-secondary school and employment.

OVR has an agreement with the KDE for transition planning and service delivery for secondary students with disabilities

#### 5. IF APPLICABLE, PLANS FOR ESTABLISHING, DEVELOPING, OR IMPROVING COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE

##### **or improving community rehabilitation programs within the State.**

In 2019, the OVR implemented Memorandums of Agreements (MOA's) with four CRP's to improve capacity and quality of Customized Supported Employment(CSE) services in Kentucky. This was a direct result of a needs assessment conducted by the OVR, which clearly indicated a need for customized employment services for individuals requiring supporting employment. Additionally, this assessment clearly showed that there were only 4 CRP's in the state that had at least one Employment Specialist who had completed the required Certification process by the KY OVR to effectively provide Customized Supported Employment services. As a result, these contracts allowed the OVR to increase CRP participation and increase the number of ES's who can provided CSE by 200%. Ongoing efforts continue in effort to assist in building capacity for this much needed service.

The OVR continues to encourage CRP involvement as it relates to student and youth services through the implementation of Pre-Employment Transition Services (Pre-ETS), with a primary focus of Work Based Learning Experience services. In 2019, the OVR had agreements with 32 CRP's for the implementation and provision of Pre-ETS.

The KY OVR works closely with the Department of Behavioral Health for the implementation and provision of Individual Placement and Support (IPS), an evidenced based model of supported employment for individuals with Serious Mental Illness (SMI) and substance abuse conditions. Currently, there are 18 CRP's that are credentialed to provide IPS, with at least 74

counties having access to this service. The CRP Branch of the KY OVR continues to meet regularly with partners to ensure quality IPS services are readily available.

The KY OVR revamped the Supported Employment Service Fee Memorandum (SFM) payment structure to CRP's, which included outcome payments that extended to 90 days. More specifically, it included increased payments to CRP's when outcomes of stable employment were achieved for 30, 60 and 90 days. This change was implemented for all models of supported employment.

#### 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 gathering the collective data required under section 116 of WIOA for all the core partners. KYStats 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.

KYStats 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.

KYStats 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.

Currently, in Kentucky the work continues to identify a plan for collecting, tracking, measuring and reporting data from the workforce partners. This requires substantial work on several levels prior to the development and implementation of a system to capture the data. Changes under WIOA have required significant modifications in the current manner that data is collected. This is further complicated by the fact that the workforce partners use different systems and tracking mechanisms.

The current Kentucky OVR 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 agency and those of common measure reporting. OVR is in process of procurement of a new system. OVR and the partners access to a Customer Relationship Management system 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. The current system has allowed for us to collect the necessary data 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.

#### 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.

The Department of Workforce Investment has established reciprocal referral services which allow for more efficient services to individuals with disabilities.

The Central Office administrative functions for 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. 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. OVR is 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.

#### 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**

**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

Measure: Increase staff retention rates

Measure Crucial positions identified are filled with qualified candidates

Objective 1.2: Training and mentorship opportunities to facilitate advancement to prevent gaps in services

Measure: Programs are developed for all class specifications.

Objective: 1.3 Increase salaries as a method to address employee retention

Measure: Increase staff retention rates by 5%

**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 2.1: Assess the training needs of staff as they apply to combined policies and procedures and WIOA.

Measure: Needs Assessment completed

Objective 2.2: 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

Measure: Staff trained on WIOA

Measure: Staff training on 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 3.1.: 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.

Measure: Completion of the combined policies and procedures manual

Measure: Revision and Implementation of Service Fee Memorandums Review and modify forms, printed materials and manuals in keeping with the combined policies and procedures.

Measure: Review and modify forms, printed materials and manuals in keeping with the combined policies and procedures. All materials produced in accessible formats

Objective 3.2: Develop operations manual

Measure: Completed, staff trained and manual distributed.

**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 4.1: Effective and efficient fiscal operations

Measure: Elimination of the waiting list by category

Measure: Serve open categories keeping with the OOS policy

Measure Open categories under Order of Selection

Measure: Operating budget

Measure: Accurate and timely reporting.

Objective 4.2: Maximize effectiveness of the Employer Services Branch

Measure: Mission Clarification

Measure Implementation of Quality Controls

Measure: Services available in every county of the state

Objective 4.3: 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: Improve efficiency and effectiveness of CRP services**

Objective 1.1 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%)

Objective 2.1: Improve monitoring and exploration of 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;

Measure: Scorecard

Objective 3.1: 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.

Measure: Two alternative strategies implemented by 2021.

#### 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:

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 continues 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. As a result of the SGA Project, which concluded in 2017, we now provide these services through a contract so that the services may be provided in-house. VR counselors can refer directly to their local WIPA or (if not

eligible) they can refer to the contracted in-house services. Also the agency continues to participate in the Return on Investment (ROI) grant. This study is 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.

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.

Through its CPID project, OVR in collaboration with the Workforce System partners assists 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

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

Measure: Increase staff retention rates

Measure: Crucial positions identified are filled with qualified candidates

Objective 1.2: Training and mentorship opportunities to facilitate advancement to prevent gaps in services

Measure: Programs are developed for all class specifications.

Objective: 1.3 Increase salaries as a method to address employee retention

Measure: Increase staff retention rates by 5%

**Progress:** A process is in place to review all requests to fill positions and a tracking mechanism is utilized to track the position request from its initial posting through the entire personnel position. Currently OVR has 33 positions posted. We will establish a baseline for staff retention from the 2019 calendar year. Executive Leadership members met with Human Resources at a Cabinet and State Level to review job classifications for the VR series and request an increase in the in-range hiring for applicants. The job specifications were changed to broaden the scope of allowable degrees given that many candidates that apply do not qualify for positions given how stringent the specifications of the job are written. There were changes made to the entry level salary managers can offer candidates. Currently, there is consistency in candidates turning down the entry level wage as well as an offer of 10% above the entry level refusing the offer of employment. OVR submitted a proposal for salary increases for staff that would stretch across the next two years of the biennial budget. OVR has a strong mentoring program for new hires. A counselor mentor training took place in July of 2019. There was continued growth on the mentor team with 9 new applicants in the 2020 recruitment cycle. The team worked on the following components for the mentoring program: Rehabilitation Counselors for the Blind review of eligibility, Individual Plan development, Specific Disabilities, Application/Referral, Follow-up/Closure, Community Work Transition Program and Pre-employment transition services.

**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 2.1: Assess the training needs of staff as they apply to combined policies and procedures and WIOA.

Measure: Needs Assessment completed

Objective 2.2: 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

Measure: Staff trained on WIOA

Measure: Staff training on policies and procedures

Progress: A training needs assessment survey was conducted in June of 2019 and the results were analyzed for trends.

Staff receive resources on an ongoing basis regarding training opportunities weekly. As a result of the reorganization a new employee training was held to address concerns of the Rehabilitation Counselors for the Blind. A statewide common measures training was held in October of 2019 that included policies established for common measures. Ethics and social media training was conducted as well as a variety of zoom trainings on policy.

**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 3.1.: 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.

Measure: Completion of the combined policies and procedures manual

Measure: Revision and Implementation of Service Fee Memorandums Review and modify forms, printed materials and manuals in keeping with the combined policies and procedures.

Measure: Review and modify forms, printed materials and manuals in keeping with the combined policies and procedures. All materials produced in accessible formats

Objective 3.2: Develop operations manual

Measure: Completed, staff trained and manual distributed.

Progress: This goal is a result of the Reorganization and the combining of the blind and general agency. A Program Procedural Manual is in draft form in review for edits. All performance plans for Counselors have been updated to reflect goals for common measures. Staff participate in a state Accessibility Community of Practice that looks at external programs and documents. Staff continue to work on internal applications. Service Fee Memorandum revisions and updates are in the review process.

An administrative operations manual is in draft form.

**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 4.1: Effective and efficient fiscal operations

Measure: Elimination of the waiting list by category

Measure: Serve open categories keeping with the OOS policy

Measure Open categories under Order of Selection

Measure: Operating budget

Measure: Accurate and timely reporting.

Objective 4.2: Maximize effectiveness of the Employer Services Branch

Measure: Mission Clarification

Measure Implementation of Quality Controls

Measure: Services available in every county of the state

Objective 4.3: 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.

Progress: Fiscal staff assigned to OVR operations are new to their positions (length of service under six months). Technical support was requested from RSA and this is ongoing. DB101 (an online tool for Social Security and SSI Disability beneficiaries) has been purchased and staff as well as community partners have been trained in its use. This online resource can be utilized by anyone including the consumer's assists with benefits planning. The agency provides benefits and financial planning to consumers through a fee-for-service or in-house through statewide contracts. VR counselors can refer directly to their local WIPA or (if not eligible) they can refer to the contracted in-house services. In-house services are highly encouraged or the fee-for-service since they are not held to any time constraints with a greater emphasis on financial planning and follow-up. OVR has conducted presentations to 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. Category Two was opened in February of 2019 and Category Three will open effective April 1, 2020. Only Category Four will remain closed.

The KATLC website offers online financial education and empowerment resources for consumers. The agency also seeks to partner with other entities to promote and expand financial empowerment activities for individuals with disabilities. The agency is partnering with

Louisville Metro Government, Kentucky Coalition against Domestic Violence, and Bank on Louisville. The agency also collaborates with the Kentucky Career Centers to provide financial education as appropriate.

Core programs and partners gained access to a business customer relationship management system based on a Salesforce platform. This platform allows the tracking of business engagement and reporting for the aligned goal of furthering business services, and is the tool that encompasses the Kentucky Integrated Business Engagement System (KIBES). The OVR Employer Services Branch is dedicated to employer outreach and consumer job placement services allowing for a consistent approach to services across the state. This enables the agency to focus on more intensive employer outreach, including increased emphasis on corporate employers and partnership, and expand direct employer interaction statewide with the business services teams.

## B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES

The combining of the two agencies into a combined agency in 2018 had an impact on the achievement of the goals and priorities. As with any merger or reorganization there is major work associated with the combining of policies, procedural operations. The process is good in many respects because agencies must closely examine operations and this bring about change that often benefits the organization. Change on this level also brings resistance from staff and requires adjustment on the part of the organizations employees. This has been a focus for Kentucky OVR over the past two years and is still a work in progress. In order to accomplish the goals and priorities of the agency this has required an intense focus for this area.

Given there also two reorganizations of the fiscal operations in Kentucky in the past 3 years, turnover increased and this has had a major impact on OVR's ability to complete federal reports in a timely manner. Turnover created the loss of veteran knowledge creating an environment where staff have needed training on every aspect of the VR program.

## 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 1: Improve efficiency and effectiveness of CRP services**

Objective 1.1 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%)

Objective 2.1: Improve monitoring and exploration of 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;

Measure: Scorecard

Objective 3.1: 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.

Measure: Two alternative strategies implemented by 2021.

**Progress:**

Four additional providers expanded services to include Customized Supported Employment via contract opportunities. An 11% increase occurred resulting in a total of 91 CRP's throughout Kentucky that provide SE services.

The team explored the development and implementation of a CRP Qualitative Assessment scale. The CRP Qualitative Survey was distributed in October of 2019. There is a MOU initiative with the Department of Behavioral Health and other state agencies to partner in addressing long term support needs. Staff conduct ongoing education and collaboration with the Department of Behavioral Health to access Medicaid Waiver Programs.

**B. DESCRIBE THE FACTORS THAT IMPEDED THE ACHIEVEMENT OF THE GOALS AND PRIORITIES**

**As with any merger or reorganization there is major work associated with the combining of policies, procedural operations. The process is good in many respects because agencies must closely examine operations and this bring about change that often benefits the organization. Change on this level also brings resistance from staff and requires adjustment on the part of the organizations employees. This has been a focus for Kentucky OVR over the past two years and is still a work in progress. In order to accomplish the goals and priorities of the agency this has required an intense focus for this area.**

**3. THE VR PROGRAM'S PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA**

Kentucky is committed to gathering the collective data required under section 116 of WIOA for all the core partners. KYStats 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.

KYStats 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.

KYStats 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.

Currently, in Kentucky the work continues to identify a plan for collecting, tracking, measuring and reporting data from the workforce partners. This requires substantial work on several levels prior to the development and implementation of a system to capture the data. Changes under WIOA have required significant modifications in the current manner that data is collected. This is further complicated by the fact that the workforce partners use different systems and tracking mechanisms.

The current Kentucky OVR 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 agency and those of common measure reporting. OVR is in process of procurement of a new system. OVR and the partners access to a Customer Relationship Management system 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. The current system has allowed for us to collect the necessary data 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.

#### 4. HOW THE FUNDS RESERVED FOR INNOVATION AND EXPANSION (I&E) ACTIVITIES WERE UTILIZED

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).

The Kentucky Office of Vocational Rehabilitation (OVR) will provide the amount of \$65,000 each year for a grant total of \$130,000 for innovation and expansion activities from Basic Support Grant Funds for 2021 and 2022. . The SILC will provide OVR a resource plan that outlines the funding allowable under 34 CFR 361.35 Innovation and Expansion Activities Resource Plans for Statewide Independent Living Councils. The funds will be utilized for the support of the salary of the SILC Coordinator and expenses of the Council. The Division Director of Blind services represents the agency on the Council. The SILC is housed under the Department of Aging and Independent Living (DAIL) in Kentucky.

Statewide Council for Vocational Rehabilitation Annual Report

The recommended theme for the Annual Report 2019 was “Stronger Together”. This theme signified one of the results of the merge of Kentucky Office for the Blind and Kentucky Office of Vocational Rehabilitation. As single units we were strong and committed to the mission of our respective agencies, but as one group we are stronger and have a unified mission. Members of the Statewide Council approved the theme prior to development of content. Content was gleaned from activities that took place throughout the state and included success stories of consumers as well as employer recognitions and statewide statistics for the year. Releases for individuals identified in the report were obtained prior to use in the publication. The report was developed in an accessible format. Upon completion the annual report was presented to the full council membership and received approval prior to distribution.

## OVR Satisfaction

### Survey

Since 1996, the Human Development Institute (HDI) at the University of Kentucky has coordinated the annual Kentucky Office of Vocational Rehabilitation Consumer Satisfaction Survey at the request of the Statewide Council for Vocational Rehabilitation. The results were presented to the Statewide Council for Vocational Rehabilitation on Monday, April 27th through a virtual platform given the COVID -19 restrictions for in person meetings. The survey is conducted with a sample of consumers of the Office of Vocational Rehabilitation who have had cases closed with the Office in the most recently completed fiscal year (between October, 2018 and September, 2019). The sample of people randomly selected to participate was stratified in order to reflect the population of all consumers with cases closed in fiscal year 2019. The University of Kentucky Survey Research Center contacted consumers by telephone between December 20, 2019 – March 2, 2020 to participate in the survey. A total of 1,011 people completed the telephone survey. The response rate for eligible participants was 70.6%.

It is important to note that the Office of Vocational Rehabilitation and the former Office for the Blind agencies have merged in Kentucky, effective October 1, 2018. This merger means that, beginning in 2019, this survey includes people served by what used to be the Office for the Blind, now a part of OVR. As such, historical comparisons are referencing past years from 1997 to 2018 when Blind Services were not a part of this survey.

The integral part of this survey seeks to determine the satisfaction level of consumers. This is accomplished by utilizing a four-point scale on a variety of items related to consumer experience with 1 = very poor, 2 = poor, 3 = good, and 4 = very good. The average of all responses was calculated from the responses given. The average overall satisfaction level for all respondent groups was 3.44 out of a possible four points. This is .06 higher than the 3.38 found in year 2018. Overall, 90.0% of survey participants indicated that services were good or very good. This represents an increase of 3.1% over last year's results. As we have experienced in prior surveys, those consumers who had cases closed with a positive employment outcome (Group A) were most satisfied (mean = 3.71). As we have seen over the history of this survey, those in Group A were more satisfied and experienced better outcomes in virtually all areas. In this survey, minor gains are found across many items over last year's results.

The number of participants who had continued their education increased 2.3% to 56.3%. Those whose cases were closed with a positive employment outcome were slightly more satisfied with their jobs and pay received. Of those in Group A, 68.1% felt that VR services helped prepare them for a job. Regardless of case closure status, almost 92.7% of people indicated that they would return to the Office of Vocational Rehabilitation if they needed to in the future.

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:

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 continues 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. As a result of the SGA Project, which concluded in 2017, we now provide these services through a contract so that the services may be provided in-house. VR counselors can refer directly to their local WIPA or (if not eligible) they can refer to the contracted in-house services. Also the agency continues to participate in the Return on Investment (ROI) grant. This study is 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.

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.

Through its CPID project, OVR in collaboration with the Workforce System partners assists 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.

#### 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 91 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 BHDID 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 ongoing 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.

## 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.

### VOCATIONAL REHABILITATION (COMBINED OR GENERAL) CERTIFICATIONS

States must provide written and signed certifications that:

1. THE (ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE,) 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[14], AND ITS SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT[15];

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Office of Vocational Rehabilitation

2. AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (ENTER THE NAME OF

DESIGNATED STATE AGENCY)[16] AGREES TO OPERATE AND ADMINISTER THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[17] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[18] , 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;

ENTER THE NAME OF DESIGNATED STATE AGENCY

Education and Workforce Development Cabinet

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[19] , THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[20] , 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;

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;

5. THE STATE LEGALLY MAY CARRY OUT EACH PROVISION OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT.

6. ALL PROVISIONS OF THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND ITS SUPPLEMENT ARE CONSISTENT WITH STATE LAW.

7. THE (ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW) 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;

ENTER THE NAME OF AUTHORIZED REPRESENTATIVE BELOW

Cora McNabb

8. THE (ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW) HAS THE AUTHORITY TO SUBMIT THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN AND THE SUPPLEMENT FOR SUPPORTED EMPLOYMENT SERVICES;

ENTER THE TITLE OF AUTHORIZED REPRESENTATIVE BELOW

Executive Director

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.

FOOTNOTES

[14] Public Law 113-128.

[15] Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

[16] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[17] No funds under title I 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.

[18] 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 3474; and the State VR Services program regulations.

[19] No funds under title VI of the Rehabilitation Act may be awarded without an approved supported employment supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

[20] Applicable regulations, in part, include the citations in footnote 6.

#### CERTIFICATION SIGNATURE

Signatory information	Enter Signatory information in this column
Name of Signatory	Cora McNabb
Title of Signatory	Executive Director
Date Signed	March 31, 2020

#### 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:**

The State Plan must include	Include
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.	

The State Plan must include	Include
3. The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:Administration of the VR services portion of the Unified or Combined State Plan:	
3.a. The establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act	
3.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 (A or B must be selected):	
3.b.(A) "is an independent State commission" (Yes/No)	No
3.b.(B) "has established a State Rehabilitation Council" (Yes/No)	Yes
3.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	
3.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)	
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. Select yes or no, as appropriate, to identify if the designated State agency allows for the local administration of VR funds (Yes/No)	No
3.f. The shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act. Select yes or no, as appropriate, to identify if the designated State agency allows for the shared funding and administration of joint programs (Yes/No)	No
3.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? (Yes/No) See Section 2 of this VR services portion of the Unified or Combined State Plan	No
3.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	
3.i. All required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act	
3.j. The requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act	
3.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	



The State Plan must include	Include
3.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	
3.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:	
4.a. Comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act	
4.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	
4.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? (Yes/No)	Yes
4.d. Determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act	
4.e. 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	
4.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	
4.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	
4.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	
4.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	
4.j. With respect to students with disabilities, the State,	
4.j.i. Has developed and will implement,	

The State Plan must include	Include
4.j.i.I. Strategies to address the needs identified in the assessments; and	
4.j.i.II. 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	
4.j.ii. Has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25))	
5. Program Administration for the Supported Employment Title VI Supplement:	
5.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	
5.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	
5.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:	
6.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	
6.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:	Yes
7.a. The Designated State Agency Assures That it Will Provide Supported Employment Services as Defined in Section 7(39) of the Rehabilitation Act	
7.b. The designated State agency assures that:	
7.b.i. The comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of	

The State Plan must include	Include
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	
7.b.ii. An individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act	

**VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS**

**Performance Goals for the Core Programs**

Each state submitting a Unified or Combined State Plan is required to identify expected levels of performance for each of the primary indicators of performance for the first two years covered by the plan. The state is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on state-negotiated levels of performance for the indicators for each of the first two years of the plan.

For Program Year (PY) 2016-2019 plans, the Departments used the transition authority under section 503(a) of WIOA to designate certain primary indicators of performance as “baseline” indicators to ensure an orderly transition from the requirements of the Workforce Investment Act of 1998 to those under WIOA. A “baseline” indicator was one for which states did not propose an expected level of performance and did not come to agreement with the Departments on negotiated levels of performance because sufficient data was not available to establish such performance levels. As a result, “baseline” indicators were not used in the end of the year adjustment of performance levels and were not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Departments designated indicators as “baseline” based on the likelihood of a State having insufficient data with which to make a reasonable determination of an expected level of performance.

For PYs 2020-2023 Plans, Title I programs (Adult, Dislocated Worker, and Youth) and the Title II program (Adult Education and Family Literacy Act) will have two full years of data available to make reasonable determinations of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit);
- Credential Attainment Rate; and
- Measurable Skill Gains

The Wagner-Peyser Act Employment Service program, authorized under the Wagner-Peyser Act, as amended by title III of WIOA, will have two full years of data available to make a reasonable determination of expected levels of performance for the following indicators for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit); and

- Median Earnings (Second Quarter after Exit)

The Credential Attainment Rate and Measurable Skill Gains indicators do not apply to the Wagner-Peyser Act Employment Service program; therefore, this program will not submit expected levels of performance for these indicators.

For the first two years of PYs 2020-2023 Plans, the Vocational Rehabilitation (VR) program, authorized under title I of the Rehabilitation Act of 1973, as amended by title IV of WIOA, will have two full years of data available for the Measurable Skill Gains indicator only. Therefore, the Departments will designate the following indicators as “baseline” for the VR program for PY 2020 and PY 2021:

- Employment (Second Quarter after Exit);
- Employment (Fourth Quarter after Exit);
- Median Earnings (Second Quarter after Exit); and
- Credential Attainment Rate

VR agencies must continue to collect and report on all indicators, including those that have been designated as “baseline, pursuant to section 116(d) of WIOA.” The actual performance data reported by these programs for indicators designated as “baseline” for PY 2020 and PY 2021 will serve as baseline data in future years. The Departments will require VR agencies to submit expected levels of performance for these indicators for PY 2022 and PY 2023.

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

Each core program must submit an expected level of performance for all of the other indicators, as applicable, with the exception of the four indicators designated as “baseline” for the VR program in PY 2020 and PY 2021. The Departments will work with states during the negotiation process to establish negotiated levels of performance for each of the primary indicators for the core programs not listed as “baseline.” Each state must update its plan to include the agreed-upon negotiated levels of performance before the Departments approve a state’s plan.

States may identify additional indicators in the 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.

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Employment (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Employment (Fourth Quarter After Exit)	Baseline	Baseline	Baseline	Baseline

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Median Earnings (Second Quarter After Exit)	Baseline	Baseline	Baseline	Baseline
Credential Attainment Rate	Baseline	Baseline	Baseline	Baseline
Measurable Skill Gains	18.0	20.0	19.0	21.0
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

1

*“Effectiveness in Serving Employers” is still being piloted and this data will not be entered for 2020 State Plans.*

## 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 elects to include 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. <sup>24</sup> If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II-IV of this document, where specified, as well as the program-specific requirements for that program.

[24] 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 would submit all other required elements of a complete State Plan for those programs directly to the Federal agency that administers the program.

### PERFORMANCE INDICATOR APPENDIX

#### ALL WIOA CORE PROGRAMS

The Departments determined that the Effectiveness in Serving Employers indicator will be measured as a shared outcome across all six core programs within each state to ensure a holistic approach to serving employers. The Departments will continue piloting approaches for measuring this indicator for the first two years of PY 2020-2023 plans. Therefore, states are not required to submit an expected level of performance for the Effectiveness in Serving Employers indicator for PY 2020 and PY 2021. However, core programs are expected to collect data and report on this indicator for PY 2020 and PY 2021 as they did for PYs 2016-2019 plans.

All WIOA Core Programs

Performance Indicators	PY 2020 Expected Level	PY 2020 Negotiated Level	PY 2021 Expected Level	PY 2021 Negotiated Level
Effectiveness in Serving Employers	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>	Not Applicable <sup>1</sup>

<sup>1</sup> "Effectiveness in Serving Employers" is still being piloted and this data will not be entered for 2020 State Plans.

### ADDITIONAL INDICATORS OF PERFORMANCE

States may identify additional indicators in the 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.

Additional Indicators of Performance

### OTHER APPENDICES