KENTUCKY PYS 2024-2027

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OVERVIEW

Under the Workforce Innovation and Opportunity Act (WIOA), the Governor of each State must submit a Unified or Combined State Plan to the Secretary of the U.S. Department of Labor that outlines a four-year strategy for the State's workforce development system. The publicly-funded workforce development system is a national network of Federal, State, regional, and local agencies and organizations that provide a range of employment, education, training, and related services and support 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.)) [1]

[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.[2] States must develop strategies that look beyond strategies for the general population and develop approaches that also address the needs of target populations. Use of links to external websites and documents is permitted within the State Plan narrative submission, if such links remain active and adhere to Section 508 accessibility requirements.

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 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 combined 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.))

Yes

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

Yes

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

Yes

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

No

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

No

Community Services Block Grant (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.

Executive Summary – Combined WIOA State Plan 2024-2027

The Commonwealth of Kentucky is in the best period of economic growth in the state's history. The Combined Workforce Innovation Opportunity Act (WIOA) State Plan supports and capitalizes on this historic time of opportunity and results by coordinating with the Kentucky's workforce development system, including Kentucky Adult Education, Career Development Office, Office of Vocational Rehabilitation, Office of Unemployment Insurance, and the Kentucky Workforce Innovation Board. These strategies and collaborative efforts within the Combined WIOA State Plan for 2024-2027 address the needs of learners, workers, and employers in the commonwealth.

Since the beginning of his administration, Governor Beshear has announced more than 1,300 private-sector new-location and expansion projects totaling over $45 billion in announced investments, creating more than 68,000 jobs. This is the highest investment figure secured during the tenure of any governor in the commonwealth's history and $24 billion more than the next highest total.

Importantly, these are high-quality, good-paying jobs that sustain families and communities. Governor Beshear has also announced some of the largest economic development projects in state history, which have solidified Kentucky as the electric vehicle battery production capital of the United States. These

include: AESC's $2 billion 2,000-job gigafactory project in Warren County; Ford Motor Co.'s $2 billion 2,200-job commitment in Louisville, as well as its $2 billion 2,100-job project at the Kentucky 1 plant in Hardin County; Shelbyville Battery Manufacturing's $712 million investment, creating 1,572 jobs in Shelby County; and Toyota's $1.3 billion investment in Scott County, among others. A wide set of additional economic investments supported and allowed for this growth, and private businesses continue to trust and believe in Kentucky's ability to provide a skilled and ready workforce to fill these jobs of the future.

To ensure the commonwealth continues to be successful in meeting the new demands of businesses and workforce, as well as supporting the needs of existing businesses, the KWIB, in collaboration with the Department of Workforce Development (administrators of WIOA), develops and provides strategic directions to Kentucky's workforce development system. The opportunity to build pathways to good quality jobs in a wide array of industries is better now than at any time in Kentucky's history. The established partnerships across the workforce development system are well-positioned to serve all Kentuckians, including expanded access to talent that WIOA was designed to serve, such as disconnected youth, formerly incarcerated individuals, veterans and their families, individuals with disabilities, adults with foundational skill gaps, and many others.

To accomplish these tasks, Governor Beshear's charge for all of Team Kentucky is to embrace a "Forward, Together" model, working collaboratively to provide the highest level of support to Kentucky job-seekers, workers, and businesses through a coordinated approach. This call to action directly aligns with KWIB's vision to "create a workforce development system that is value driven for employers, aligns education with industry demands, prepares Kentuckians for the future of work, and drives economic development." This vision is supported by the four goals of Kentucky's Workforce Strategic Plan: employer engagement, education attainment, workforce participation, and resource alignment.

In this 2024-2027 WIOA State Plan, Kentucky's strategic and operational activities are outlined with the overarching theme of continuous improvement to align services and resources, collaborate across systems, and strengthen and develop partnerships to better serve the needs of individual customers, businesses, and workforce system staff in a rapidly evolving economy. From highlighting successful local programs executed by the 10 Local Workforce Development Areas (LWDA) to showing how the Department of Workforce Development is innovating to meet business and individual customer needs, the Kentucky Career Centers (KCC) provides a system-wide branding to support this work.

The WIOA State Plan was developed with input from various stakeholders essential to the commonwealth's strategic and operational direction through localized and statewide listening sessions, as well as input from individuals representing businesses, elected officials, community-based organizations, government, and individual consumers. All of these stakeholders provide unique and informative perspectives on a reimagined workforce development system. This state plan is meant to be a living document that encourages the workforce development system to continue to work collaboratively to best meet the needs shared by the stakeholders.

Additionally, this plan takes into consideration the changing dynamics of technology, more opportunities to align workforce partners to serve employers and business, and the importance of early childhood education as a workforce development strategy. Specifically, the Pre-K for All program are noted in the modification of the plan as strategies to address alignment in business services and opportunities for addressing early childhood education.

Furthermore, strategies within this plan align to the U.S. Department of Labor's *America's Talent Strategy.* Kentucky's workforce development system is intentionally industry-driven with employers signaling demand, skills, and credentials of value. Additionally, on the workforce talent side, the responsiveness of the workforce system focuses on worker mobility to secure good jobs that are high-skill, high-wage, and in-demand. Together the workforce system operates an integrated model to ensure all resources are delivered to both individuals and employers with accountability, flexibility, and innovation at its core.

To create a workforce development system that meets the needs of employers and workers, educational opportunities and training must be aligned with industry demands to prepare Kentuckians for the future of work while also driving economic development. The 2024-2027 WIOA State Plan embraces the collaborative spirit of Team Kentucky to move the commonwealth Forward, Together.

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. Where requirements identify the term "populations", these must include individuals with barriers to employment as defined at WIOA Section 3. This includes 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. Additional populations include veterans, unemployed workers, and youth, and others that the State may identify.

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.

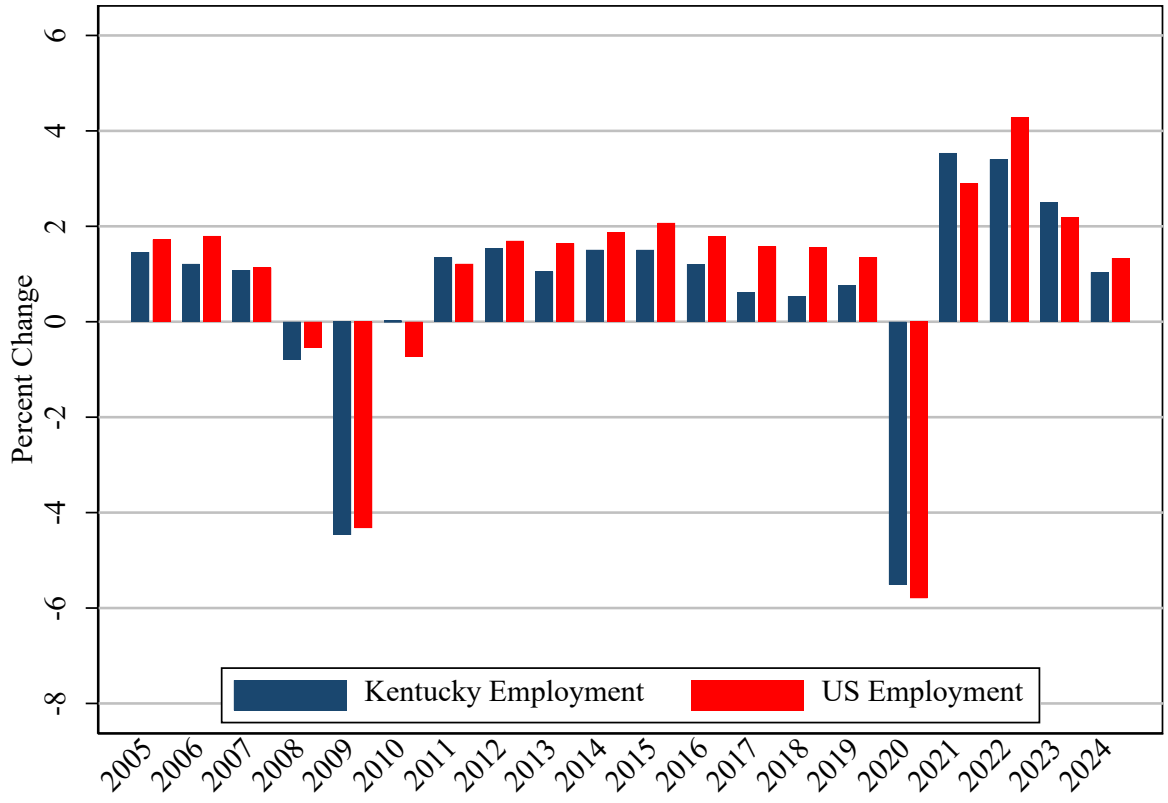
III. EMPLOYERS' EMPLOYMENT NEEDS

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.

A. Economic Analysis

Kentucky has experienced a tight labor market and strong economic growth since the end of the pandemic. The prime-age labor force participation rate is higher than its pre-pandemic level, but the overall labor force participation rate has continued to decline. Demographic characteristics such as age, disability status, and educational level all affect labor force participation. Kentucky needs a growing, skilled labor force to meet this demand for workers. Understanding the current population and labor market is a critical step to fostering a healthy future labor force.

Figure 1
Percent Change in Nonfarm Employment in the US and Kentucky from 2005 to 2025

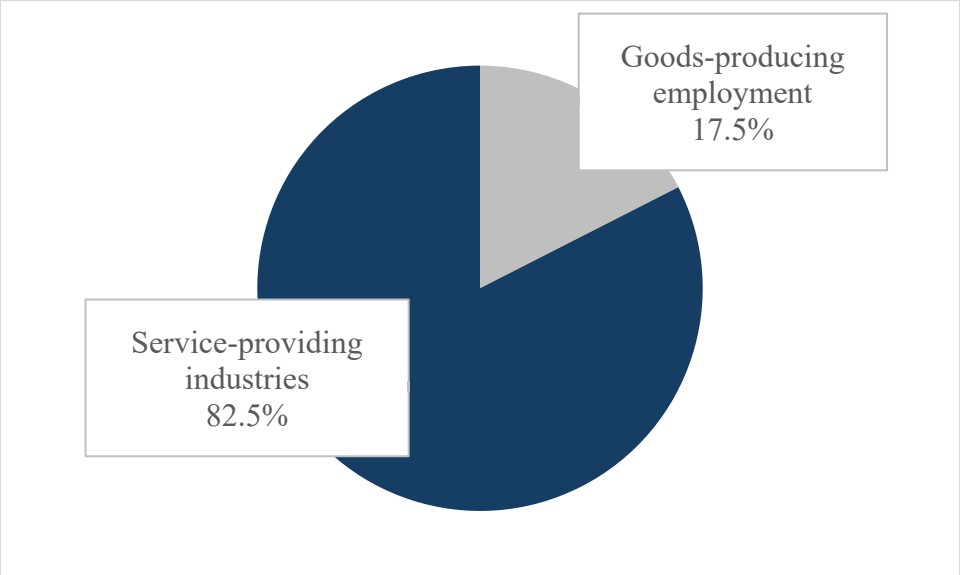


Source: Bureau of Labor Statistics, Current Employment Statistics (CES), 2024.

I. Existing Demand Industry Sectors and Occupations

Although Kentucky is often considered a manufacturing state, only 17.5 % of the state's total nonfarm employment in 2024 was in goods-producing sectors (Figure 2). The remaining 82.5 % of Kentucky's nonfarm employment was in service industries such as medical care, transportation, and personal care services.

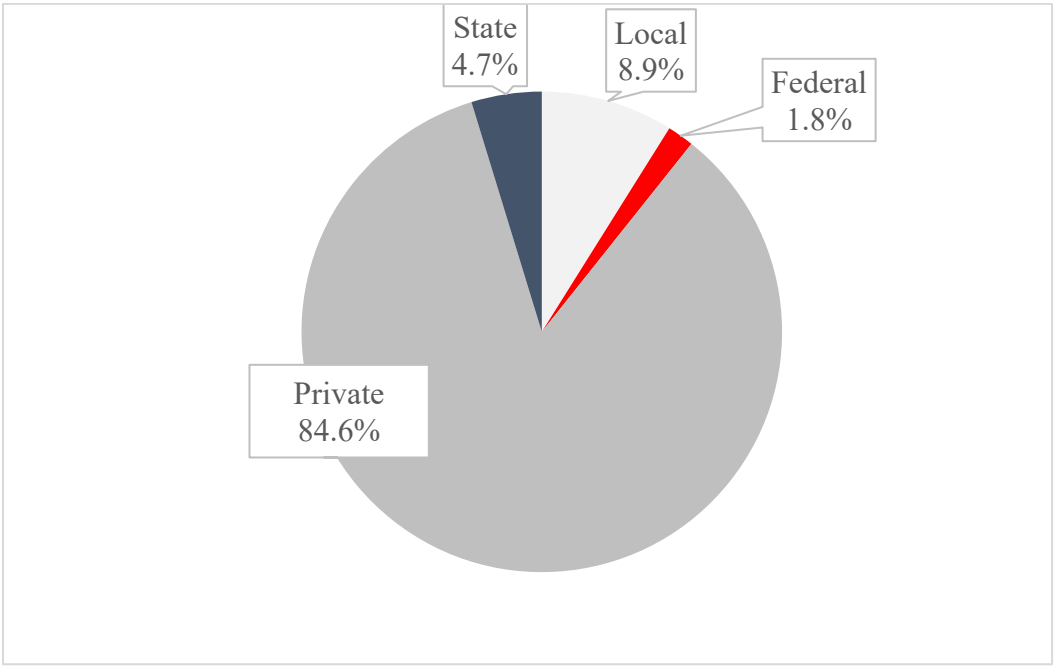
Figure 2
Kentucky Employment by Product Type in 2024



Source: Bureau of Labor Statistics, Current Employment Statistics (CES), 2024.

Figure 3 shows employment by type of employer. Most Kentucky jobs are in the private sector; only 15.4 % are in the public sector.

Figure 3
Kentucky Employment by Sector in 2024



Source: Bureau of Labor Statistics, Current Employment Statistics (CES), 2024.

Employment by Industry

Table 1 shows the number of jobs by sector and the average annual pay in each industry in 2024. This wage data is specific to Kentucky and not a national average.

Table 1
2024 Kentucky Employment by Sector and Median Annual Pay

Industry	Employment	Share of total employment	Average annual wage
Accommodation and food services	179,200	9.0%	$24,000
Administrative and support and waste management and remediation services	121,911	6.1%	$46,000
Agriculture, forestry, fishing, and hunting	9,100	0.5%	$49,000
Arts, entertainment, and recreation	29,700	1.5%	$60,000
Construction	93,600	4.7%	$73,000
Educational services	164,300	8.3%	$43,000
Financial activities	72,800	3.7%	$92,000
Healthcare and social assistance	313,800	15.8%	$62,000
Information	23,600	1.2%	$78,000
Management of companies and enterprises	22,500	1.1%	$114,000
Manufacturing	257,700	13.0%	$75,000
Mining, quarrying, and oil and gas extraction	7,900	0.4%	$87,000
Other services	48,900	2.5%	$47,000
Professional, scientific, and technical services	89,500	4.5%	$85,000
Public administration	94,600	4.8%	
Real estate and rental and leasing	22,600	1.1%	$57,000
Retail trade	210,000	10.6%	$37,000
Transportation and warehousing	137,000	6.9%	$67,000
Utilities	12,500	0.6%	$112,000
Wholesale trade	81,000	4.1%	$84,000
Total employment	**1,988,300**	**100.0%**	**$60,000**

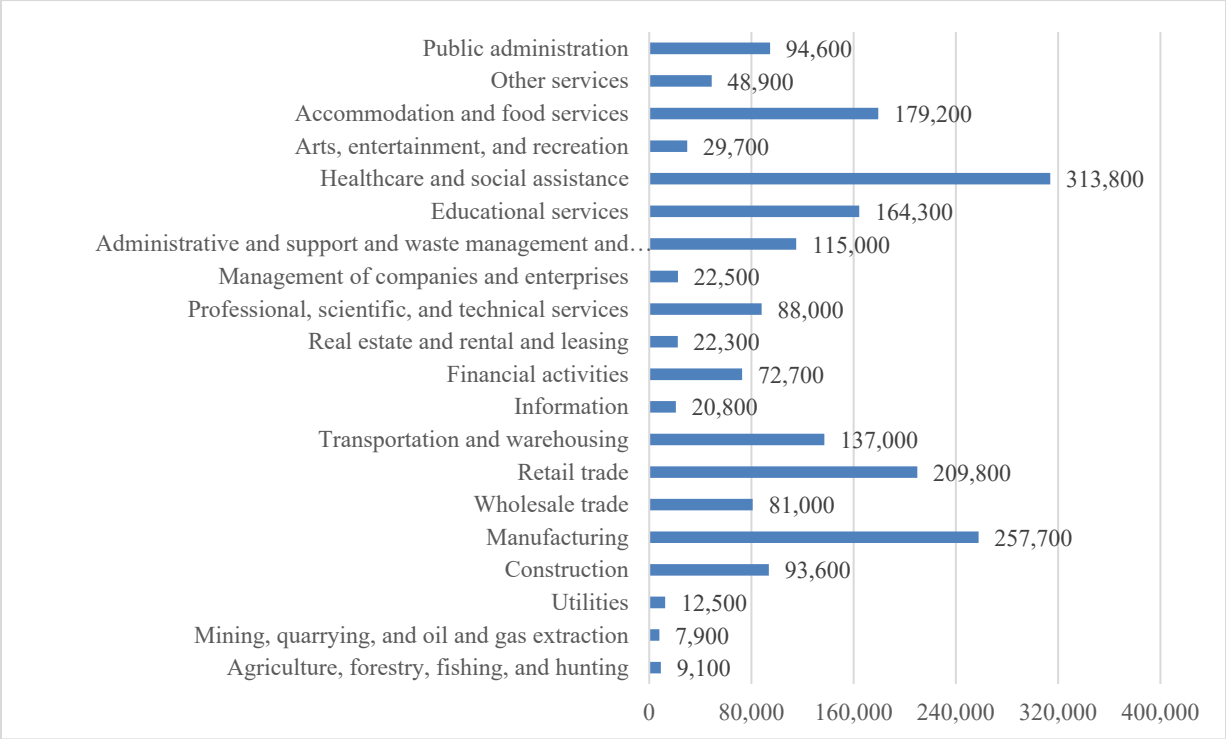
Source: Quarterly Census of Employment and Wages (QCEW), 2025.

Figure 4 shows the number of jobs in the 20 major industries. The five largest sectors in Kentucky, based on employment, are:

- Healthcare and social assistance
- Manufacturing
- Retail trade

- Accommodation and food services
- Educational services

Figure 4
Number of Jobs by Industry in 2024



Source: Quarterly Census of Employment and Wages (QCEW), Bureau of Labor Statistics (BLS), 2025.

Employment in Kentucky's healthcare and social assistance industries was nearly 313,400 in 2024, which is approximately 16 % of Kentucky's total nonfarm employment. Individuals who worked in this sector earned an average of $62,000 annually. Jobs in these industries include doctors, nurses, home health aides, and social workers.

Employment in Kentucky's manufacturing industry averaged 257,700 jobs in 2024, accounting for approximately 13% of Kentucky's total employment. Jobs in the manufacturing sector pay an average annual wage of $75,000. Machinists, production workers, assemblers, and inspectors are all included in this sector.

Retail trade accounted for 210,000 jobs in Kentucky in 2024. Individuals who worked in this industry earned an average annual salary of $37,000. Gas station attendants, stock clerks, and cashiers are all considered part of this industry.

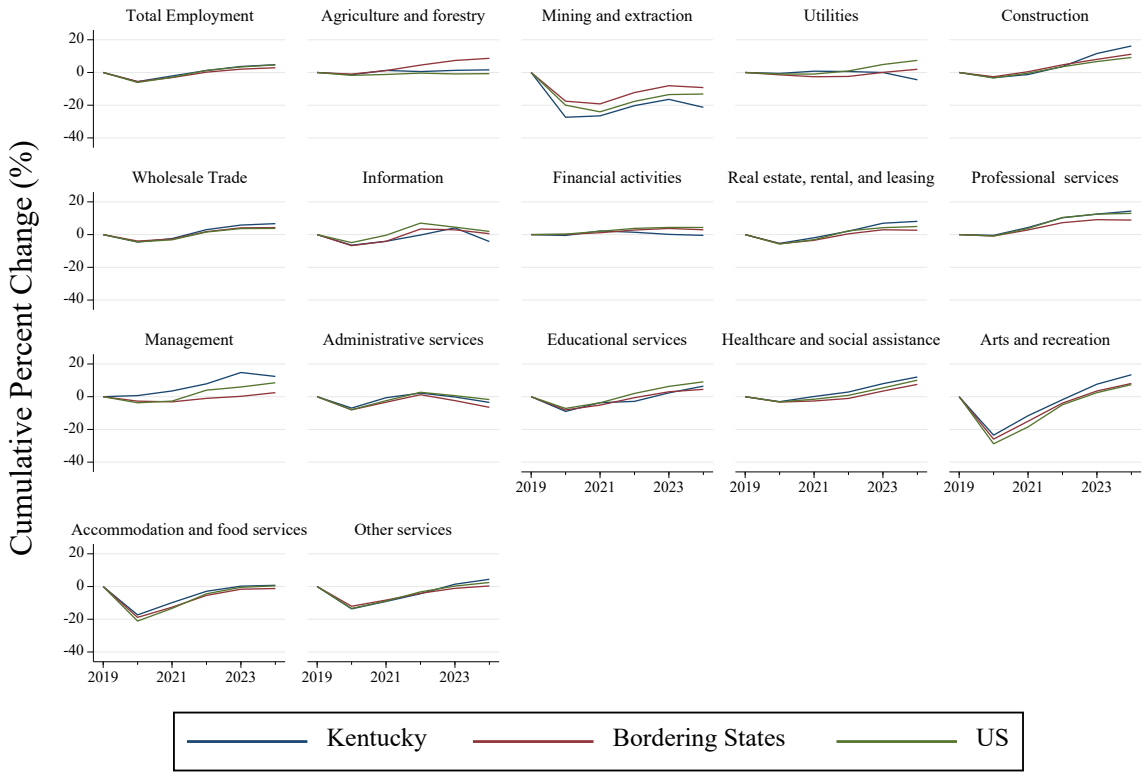
The fourth-largest industry in Kentucky is accommodation and food services, which accounted for nearly 179,200 jobs (9% of Kentucky's employment) in 2024. Many individuals work less than full-time

in this industry. On average, individuals in this industry earn $24,000 annually. Jobs such as hotel clerks, waiters, line cooks, and kitchen managers are all part of this industry.

Lastly, employment in educational services was 164,300 in 2024, approximately 8% of Kentucky's total employment. This industry includes public and private elementary and secondary schools, colleges, trade schools, and businesses that provide educational support. Jobs in this industry include teachers, teacher's assistants, tutors, and professors. On average, jobs in this industry paid approximately $48,000.

Figure 5

Change in number of jobs by industry for Kentucky, US, and Bordering States



I. Emerging Demand Industry Sectors and Occupations

Recovery and Growth by Industry Since the COVID-19 Pandemic

Figure 5 illustrates the changes in employment across different sectors from January 2019 to December 2024 for Kentucky, its surrounding states, and the nation. Total employment in Kentucky increased 4%, but not all industries grew the same during this period. Some industries were significantly lower than their pre-pandemic level including:

- Mining and logging (-14.6%)
- Administrative services (-3.9%)

- Information (-0.5%)

Kentucky has also seen notable employment growth in industries since 2020. Industries that are notably larger than their pre-pandemic levels include:

- Construction (+12.2%)
- Professional, scientific, and technical services (+12.0%)
- Healthcare and social services (+9.9%)
- Arts, entertainment, and recreation (+9.6%)

Anticipated Growth of Kentucky Industries

Throughout the years, the Kentucky Cabinet for Economic Development (CED) has announced new economic development projects and expansions among many existing companies in manufacturing, service and technology, and agribusiness sectors. These announcements often include employment projections. Table 2 shows the projected employment and average hourly wage for projects that received final approval from 2020-2024.

Table 2
Projected Industry Employment and Hourly Wage Associated with Projects that Received Final Approval from 2020 to 2024

Sector	Estimated number of new jobs	Estimated median annual wage
Manufacturing	28,281	$40,200
Service & Technology	3,133	$44,300
Non-Retail Service & Technology	1,600	$40,180
Headquarters	1,543	$58,000
Service	200	$28,000
Alternative Fuel or Gasification	11	
Public Hospital	6	
Total jobs/ average hourly pay (weighted)	**35,100**	**$38,000**

Source: Kentucky Cabinet for Economic Development, Financial Incentives Database, 2025. Note: The estimated annual wage is calculated using the company's estimated hourly wages and assuming full-time employment of 2000 hours per year.

The companies provide CED with these estimates. The actual employment realized from these projects might differ from the initial projections. In addition, although a project may be planned and even started, not all of them may be completed. Even with these caveats, these announcements indicate where Kentucky may see additional employment growth in the future.

Projected Emerging Industries

If state and local agencies can accurately identify emerging sectors and the skills these sectors will need from their employees, these agencies can allocate resources to help meet these needs as they develop. However, identifying emerging sectors is difficult because their growth rates often level off a few years after a new sector's establishment.

In an analysis designed to identify emerging industries using past labor market data, of the emerging industries identified, only 58% continued to grow faster than overall employment in Kentucky for the next three years.[1]

These results suggest that accurately identifying emerging sectors is difficult to do reliably. A reliable workforce investment could include allocating resources towards improving the labor force's general skills, such as increasing the mathematical and literacy skills in the workforce, which would enable them to transition between a broader range of industries.

II. Employer's Employment Needs

Because identifying "emerging sectors" reliably is challenging, it is also difficult to prepare the workforce for the specific skills these new industries might need. This could result in investments to develop skills in preparation for industries that ultimately do not develop. A more reliable investment may be to put resources towards helping individuals develop a portfolio of transferable skills through educational programs and real-world experiences.

Focusing on meeting the future labor demands of established sectors in Kentucky may do more to ensure long-term economic growth and avoid labor shortages. In particular, ensuring that Kentucky has a workforce that can thrive in large and growing employment sectors, such as healthcare and manufacturing, may be more effective than attempting to identify emerging sectors.

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[1] This analysis examined changes in employment across 3-digit NAICS codes in Kentucky to identify potentially emerging industries. The WIOA act does not provide a formal definition of an emerging sector. So, this analysis used three criteria to define emerging sectors. First, the existing sector in Kentucky must be initially small, so only 3-digit sector with employment that was less than 2% of Kentucky's total nonfarm employment were considered. 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 large one-time increase.

Using 2014–2017 data, CBER found only 58% (18 of 31) of the identified emerging sectors grew faster than overall Kentucky employment over three years. Additionally, growth slowed in the remaining 13 sectors that were identified as "emerging". Minor changes to the selection criteria produced similar findings. Because emerging sectors are smaller than established industries such as Health Care and Social Assistance or Educational Services, even above-average growth translated into only modest job gains.

O*Net, a database that reports the skills needed for different occupations, identifies a number of cross-functional skills, which it defines as "developed capacities that facilitate performance activities that occur across jobs". These are skills that are needed for almost all jobs across multiple sectors and that allow workers to transition between labor market sectors. O*Net identifies four highly transferable skill sets: 1) Complex Problem-Solving Skills, 2) Resource Management Skills, 3) Social Skills, 4) Systems Skills, and 5) Technical Skills. A few examples of the skills in these transferable skill sets are provided in Table 3 below. A workforce with strong transferable skills can adapt to a range of economic conditions.

Table 3
Cross-Functional Skills

Complex Problem Solving	**Resource Management**	**Social**	**Systems**	**Technical**
Redesigning and improving systems	Managing financing and expenditures	Coordinating with others	Identifying actions to improve performance	Equipment maintenance and repair
Adaptable responses to novel situations	Managing equipment and facilities	Negotiating and reconciling with others	Evaluating how changes affect outcomes	Selecting appropriate equipment
Creating learning strategies	Developing and directing employees	Identifying and understanding the emotions of others	Considering the costs and benefits of actions	Generating and adapting technologies
				Quality control analysis

Source: Compiled by the author using the information provided by O*NET, 2024.

B. Workforce Analysis

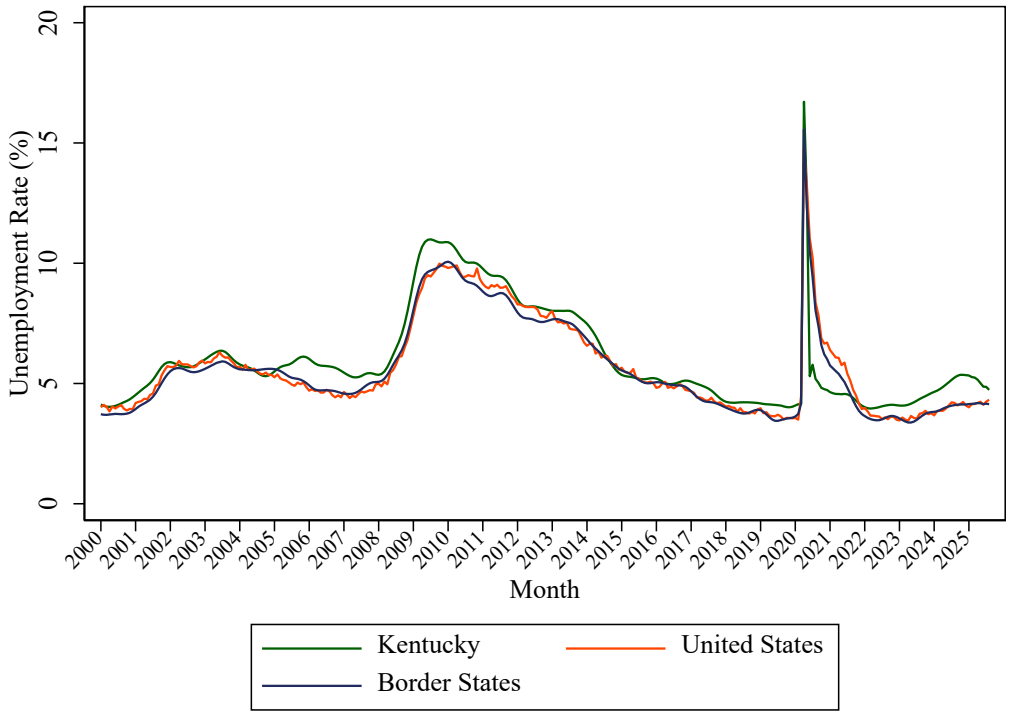
I. Employment and Unemployment

Economists commonly use unemployment and labor force participation rates to measure labor market health. The labor force comprises people who are either employed or looking for work. The labor force participation rate is the percentage of an area's population in the labor force (over the age of 16 and not institutionalized). The unemployment rate is the percentage of people in the labor force who do not have a job but are looking for work. Understanding these metrics is key to understanding how the labor market is performing.

Unemployment Rate

Figure 6 shows how Kentucky's unemployment rate has changed compared to national trends and those of Kentucky's bordering states (Indiana, Illinois, Missouri, Ohio, Tennessee, Virginia, and West Virginia).

Figure 6
Unemployment Rate for Kentucky, the United States, and Border States from 2000-2025

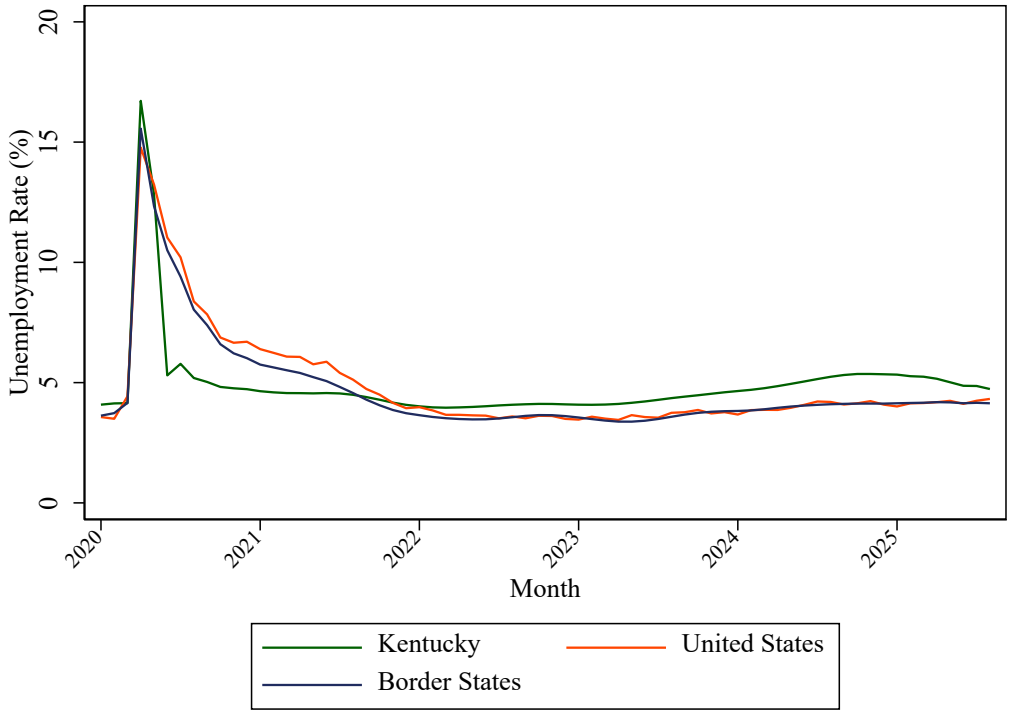


Source: Local Area Unemployment Statistics (LAUS), Bureau of Labor Statistics (BLS), 2025.

Kentucky's unemployment rate is typically higher than that of its surrounding states and the national average, but it follows similar trends. Kentucky's unemployment rate increased during the 2001 recession and stayed relatively constant until the Great Recession. As the US economy stalled in 2008, unemployment rates nationwide began to rise. Kentucky's unemployment rate increased to 11.9% in February 2010. This was 2.1% higher than the national unemployment rate. During the subsequent labor market recovery, unemployment rates for the US and Kentucky slowly decreased to their pre-recession level by 2015. The national and state unemployment rates continued to decline steadily, reaching a seasonally adjusted pre-pandemic low of 4% unemployment for Kentucky in November 2019.

After spiking during the initial months of the pandemic, Kentucky's unemployment rate quickly dropped **below the national rate and has remained lower than the national unemployment rate**. Figure 7 illustrates the changes in the unemployment rate since 2020. While the unemployment rate for all geographies has increased, they remain low compared to historic averages.

Figure 7
Unemployment Rates for US, Kentucky, and Bordering States from 2020-2025



Source: Local Area Unemployment Statistics (LAUS), Bureau of Labor Statistics (BLS), 2025.

Changes during the first few months of the pandemic illustrate how simple changes to a state's unemployment rate might not tell the complete story about current labor market conditions.

The unemployment rate represents the percentage of people in the labor force who are not employed but are actively seeking work, compared to the total labor force. Individuals who are not employed either voluntarily (choosing not to work because they have retired, care for children, or other reasons) or involuntarily (not able to work due to a disability or other reason).

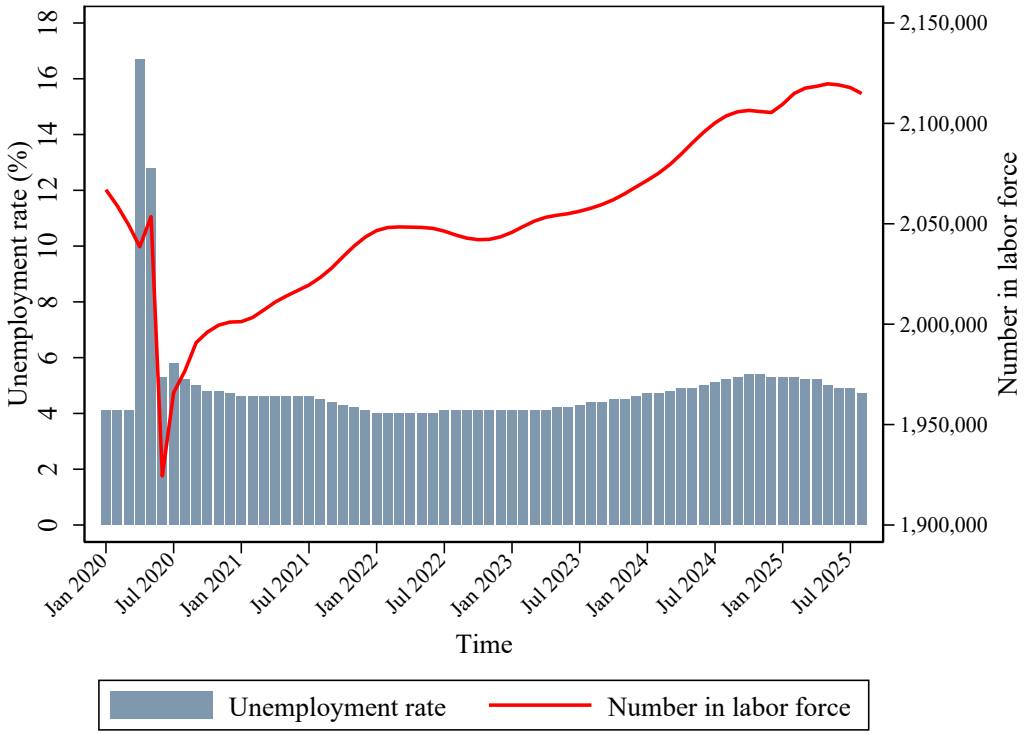
To avoid classifying labor market nonparticipants as unemployed, an individual must have actively looked for work within the past four weeks to be considered unemployed. The Bureau of Labor Statistics (BLS) considers submitting job applications to employers and attending job interviews as an "active search." It also includes contacting a recruiter or utilizing available social networks for job leads, either directly or through social media announcements. If an individual has not searched for work within the past month, they are no longer considered part of the labor force.

Typically, an individual must be actively looking for work to receive unemployment benefits, but the job search requirement was suspended in response to the State of Emergency declared on March 6, 2020. Many individuals stopped looking for work, likely because there were very few employment

opportunities or they could not work due to caretaking duties or health concerns. Because they were not looking for work, many people who had jobs before the pandemic were not classified as being "unemployed." Instead, they were classified as "out of the labor force" and were no longer included in the calculation of the official unemployment rates. Figure 8 shows how the steep drop in the unemployment rate occurred concurrently with a significant decline in the number of individuals classified as part of the labor force. Kentucky's labor force has grown in recent years while the unemployment rate has remained relatively stable.

At the beginning of 2025, the number of individuals in the Kentucky labor force was at an all-time high. However, in recent months, this number has declined, coinciding with a decrease in the unemployment rate. The decline in the number of people in the labor force may have been partially responsible for the decrease in the unemployment rate. This may indicate that individuals have begun to stop looking for work and are no longer in the labor force because they have been unsuccessful in finding employment. As of June 2025, Kentucky's labor force participation rate has declined by 0.7% from a high of 58.7% at the beginning of the year to 58.0%. While the labor force and participation rate had temporarily declined nationwide, they have since returned to their January 2025 levels.

Figure 8
Kentucky Unemployment Rate and Labor Force from 2020 to 2025



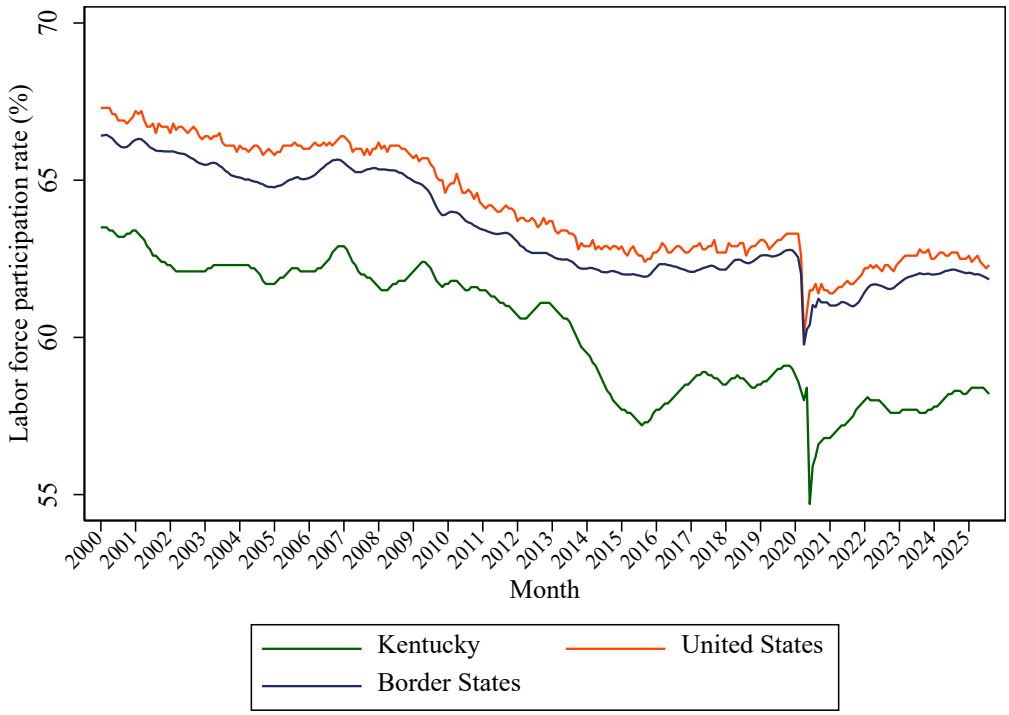
Source: Local Area Unemployment Statistics (LAUS), Bureau of Labor Statistics (BLS), 2025.

Labor Force Participation Rate

The labor force participation rate is the ratio of individuals participating in the labor market compared to the civilian non-institutionalized population aged 16 and over. This counts most people in the population, but it does exclude those serving in the military, those who are incarcerated, or those living in mental facilities or homes for the aged. Over the past five years, the average labor force participation rate was 62.2% for the US and 57.7% for Kentucky (2020-2025).

Both nationally and in Kentucky, it is worth noting that the labor force participation rate has been slowly declining since 2000. The long-term decline in the labor force participation rate corresponds to the Baby Boomer generation (age 58-77) reaching retirement age. Because this age group makes up a large portion of the adult population, in recent years the number of people exiting the labor force has been greater than the number of new labor force entrants.

Figure 9
Average Labor Force Participation Rate for the US, Kentucky, and Bordering States



Source: Local Area Unemployment Statistics (LAUS), Bureau of Labor Statistics (BLS), 2025.

The labor market has been tight since the COVID-19 pandemic ended. As of August 2025, Kentucky had a labor force participation rate of 58.3%. This means that 58.3% of individuals over the age of 16 are either employed or looking for work. While prime age individuals have increased their labor force participation, overall participation has declined. With employers struggling to find workers and wages increasing, companies may begin investing in capital to reduce their reliance on labor. A recent research

paper published by the Chicago Federal Reserve stated that "what is restraining growth in the labor market now is the long-run trend in labor supply, already known before the pandemic" (Ahn et al., July 2023, p.16).

Because Kentucky's labor market varies significantly with geography and is affected by the businesses and demographics of individuals living there, it is worth examining the labor market of smaller geographic areas rather than only reporting the statistics at the state level.

Kentucky's Local Workforce Development Areas

The KWIB advises the Governor, develops workforce development and training plans, and addresses labor force issues. KWIB works in partnership with the ten different LWDAs to address the unique needs of the population in each area (Figure 10). It is helpful to examine the labor market and population demographics of the LWDAs individually.

The 2023 American Community Survey (ACS), published by the US Census Bureau, allows researchers to examine the demographic characteristics of different areas. These statistics reflect the situation in these areas as of 2023. To recreate more recent labor force statistics for the LWDAs, a combination of BLS labor force data and Census Bureau population and demographic data was utilized.

Figure 10
Kentucky's Local Workforce Development Areas (LWDA)

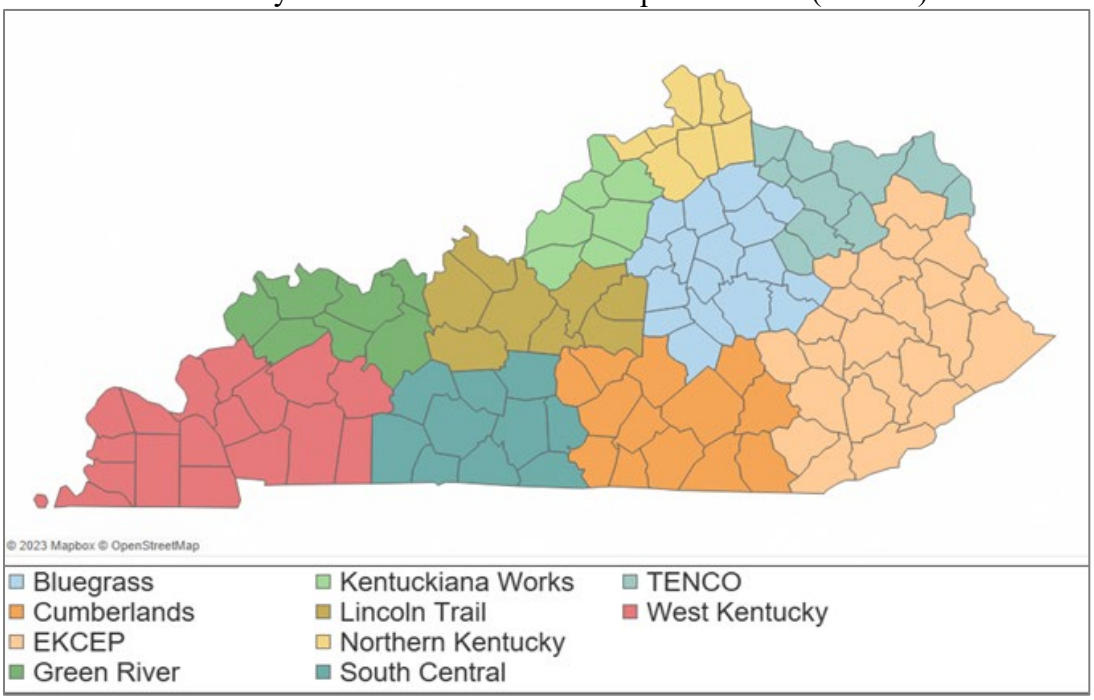
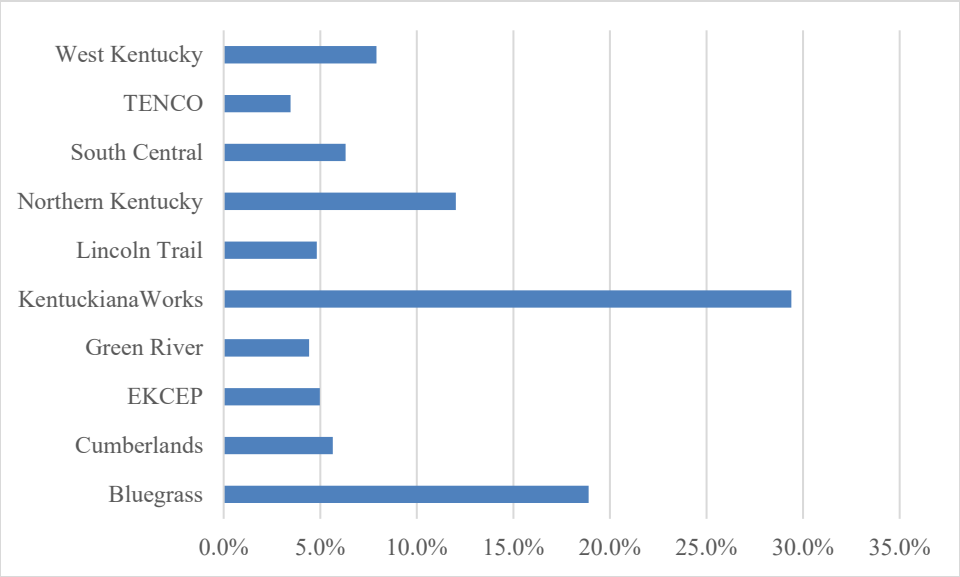


Figure 11 shows the percentage of total Kentucky jobs by LWDA. Nearly half of Kentucky's jobs are in the three largest LWDAs - Bluegrass, KentuckianaWorks, and Northern Kentucky.

Figure 11
Percentof Kentucky Jobs Located in Each LWDA in 2024



Source: Quarterly Census of Employment and Wages, Bureau of Labor Statistics (BLS), 2025.

Table 4 shows the percentage of the population who are employed, unemployed, and not in the labor force for each LWDA. For example, in 2024, the EKCEP LWDA had 8.0% of Kentucky's population over the age of 16. Additionally, in 2024, 54.5% of the EKCEP population is not in the labor force, 2.2% were unemployed, and 43.2% of those over the age of 16 were employed.

Table 4
Kentucky's 2023 Labor Force by LWDA

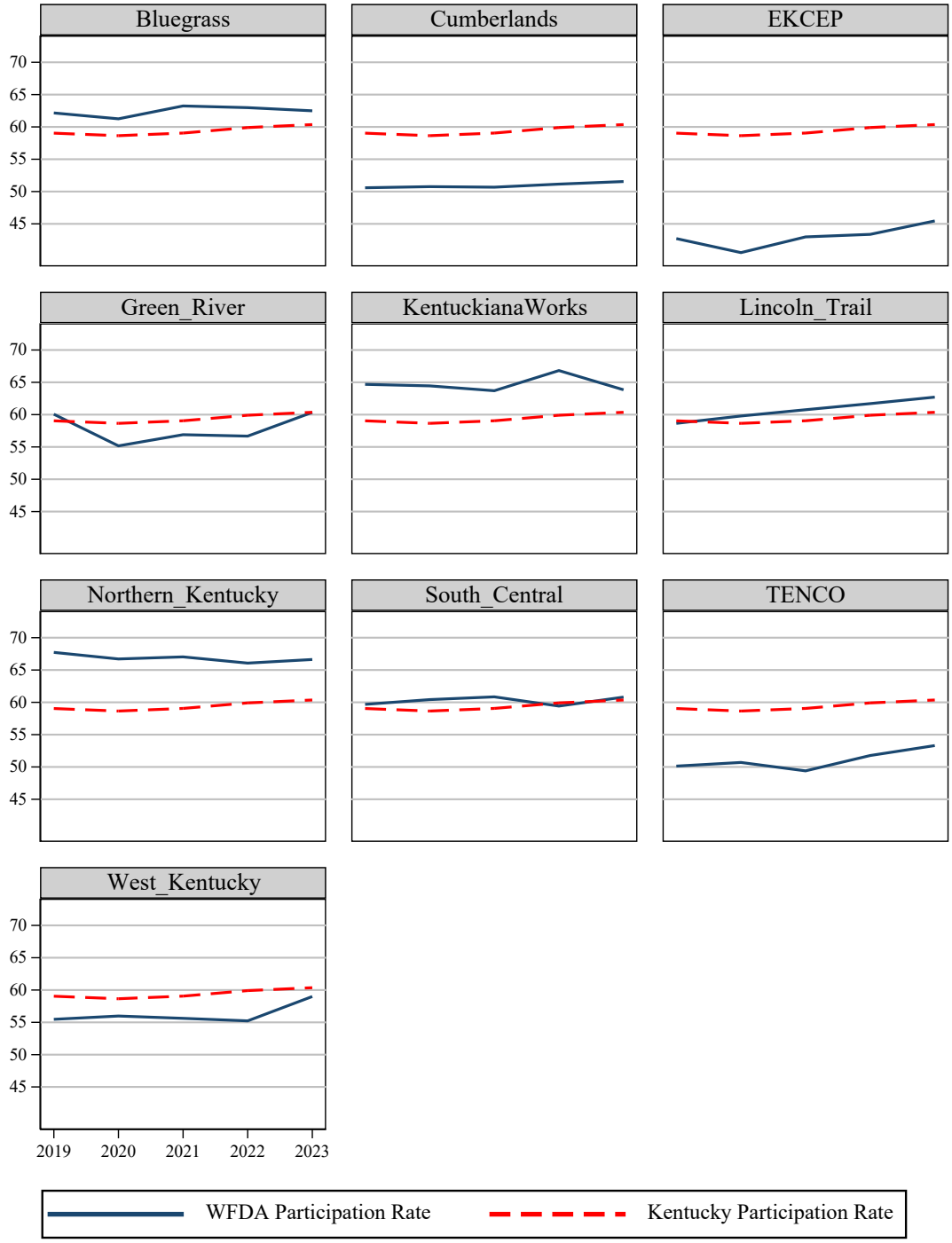
Workforce Development Area	Population 16 and over	Percent of Kentucky's population	*Labor force status*		
			Employed	Unemployed	Not in labor force
Bluegrass	602,000	17.0%	59.7%	2.5%	37.5%
Cumberlands	260,300	7.3%	48.7%	2.8%	48.4%
EKCEP	282,600	8.0%	43.2%	2.2%	54.5%
Green River	173,500	4.9%	57.7%	2.6%	39.6%
Kentuckiana Works	816,700	23.0%	61.0%	2.8%	36.1%
Lincoln Trail	228,800	6.4%	60.1%	2.6%	37.3%
Northern Kentucky	381,100	10.7%	64.4%	2.2%	33.4%
South Central	259,400	7.3%	58.1%	2.7%	39.2%
TENCO	223,200	6.3%	50.6%	2.7%	46.7%
West Kentucky	326,500	9.2%	57.1%	1.9%	41.0%
Kentucky	**3,552,000**	**100.0%**	**57.8%**	**2.5%**	**39.6%**

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota, www.ipums.org.

Figure 12 shows how the labor force participation rate has changed in each LWDA over time. BLS does not publish labor force participation rates at the county level, so the labor force participation rates in these figures were created by using population and demographic data from ACS. The changes in the labor force participation rate across LWDAs are unique and imply underlying forces and characteristics that drive these disparate behaviors. It is useful to examine the demographic composition of the LWDAs to inform the development of workforce programs and ensure resources are being allocated effectively.

Figure 12

Labor Force Participation by LWDA Compared to State Average



Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota, www.ipums.org.

II. Labor Market Trends:

Long-term Industry Trends: State and Local

Kentucky nonfarm employment increased by 10% from 2014 to 2024, with an average annual increase of 2.4%. Table 5 reports the change in employment from 2014 to 2024.

Notably, employment in mining, quarrying, and oil and gas extraction decreased by 60.8% during the past decade. This sector decreased from 16,000 employees in 2014 to only 7,800 employees in 2024. The growth in transportation and warehousing during this period was nearly as dramatic. Kentucky's other two fastest-growing industries during these 10 years were professional, scientific, and technical services (25%) and construction (23.9%).

Table 5
Employment Growth in Kentucky Industries 2014 – 2024

Industry	Total change in employment		Average annual change	
	2024 Employment	2014 Employment	Percent Change	Number of Jobs
Agriculture, forestry, fishing, and hunting	9,100	8,100	1.2%	100
Mining, quarrying, and oil and gas extraction	7,900	16,300	-5.7%	(850)
Utilities	12,500	12,600	-0.1%	(10)
Construction	93,600	72,900	2.8%	2,100
Manufacturing	257,700	234,700	1.0%	2,300
Wholesale trade	81,000	74,400	0.94%	700
Retail trade	209,800	206,00	4.2%	400
Transportation and warehousing	137,000	96.200	1.9%	4,100
Information	20,800	29,000	-1.9%	(500)
Financial activities	72,700	71,200	0.2%	200
Real estate and rental and leasing	22,300	20,100	2.2%	400
Professional, scientific, and technical services	88,000	73,000	2.3%	1,700
Management of companies and enterprises	22,500	20,700	0.9%	180
Administrative and support and waste management and remediation services	115,000	118,400	-0.3%	-300
Educational services	164,300	168,500	-0.25%	(400)
Healthcare and social assistance	313,800	260,300	2.1%	5,500
Arts, entertainment, and recreation	29,700	22,700	3.14%	700
Accommodation and food services	179,200	162,200	1.0%	1,700
Other services	48,900	47,600	0.3%	(130)
Public administration	94,600	92,500	0.2%	(200)
Total employment	**1,988,300**	**1,807,100**	**2.4%**	**18,100**

Source: 2024 Quarterly Census of Employment and Wages (QCEW), Bureau of Labor Statistics (BLS), Accessed 2025.

These statistics are available by LWDA in the Appendix of this document. There is significant variation within Kentucky, and many LWDAs behave differently than observed at the state level.

III. Education and Skill Levels of the Workforce

Labor market behavior varies across different demographic groups and within the various LWDAs. Major demographic factors on workforce participation include:

- Age
- Level of educational attainment
- Literacy level
- Disability status
- Poverty status
- Veteran status
- Incarceration history
- Race
- Homelessness
- English learner status
- Displaced homemaker status
- Farmworkers
- Foster care
- Native status

Many factors dictate the likelihood of an individual participating in the labor force and their level of participation (working part-time or holding multiple jobs). Factors such as age, race, and an individual's past experiences, such as their veteran or former offender status, also influence their labor market behavior. Many of these barriers might also be compounded or negated based on other demographic traits of the individual.

Age

Age plays an influential role in how an individual chooses to participate in the labor market, if at all. Table 6 showed the labor force status of individuals 16 years and over by LWDA.

Table 6
Labor Force Status of Population 16 and Over by LWDA

Workforce Development Area	Population 16 and over	Percent of Kentucky's population	*Labor force status*		
			Employed	Unemployed	Not in labor force
Bluegrass	602,000	17.0%	59.7%	2.5%	37.5%
Cumberlands	260,300	7.3%	48.7%	2.8%	48.4%
EKCEP	282,600	8.0%	43.2%	2.2%	54.5%
Green River	173,500	4.9%	57.7%	2.6%	39.6%
Kentuckiana Works	816,700	23.0%	61.0%	2.8%	36.1%
Lincoln Trail	228,800	6.4%	60.1%	2.6%	37.3%
Northern Kentucky	381,100	10.7%	64.4%	2.2%	33.4%
South Central	259,400	7.3%	58.1%	2.7%	39.2%
TENCO	223,200	6.3%	50.6%	2.7%	46.7%
West Kentucky	326,500	9.2%	57.1%	1.9%	41.0%
Kentucky	**3,552,000**	**100.0%**	**57.8%**	**2.5%**	**39.6%**

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS 2025, USA, University of Minnesota, www.ipums.org.

BLS defines “prime age” workers as individuals between the ages of 25 and 54. This is because most individuals have finished their school careers by age 25, and by 55, many begin to limit their involvement in the labor force by reducing the hours they work a week or retiring early. Table 7 shows the prime-age population and their labor market status in the different LWDAs. On average, 76.8% of prime-age individuals are employed, and only 20% are not part of the labor force. This is significantly higher than the participation rate presented in Table 6, which includes all eligible individuals over 16 years old.

Table 7
Labor Force Status of Prime-age Individuals by LWDA

Workforce Development Area	Population 25-54	*Labor Force Status*		
		Employed	Unemployed	Not in labor force
Bluegrass	279,000	79.3%	2.7%	18.0%
Cumberlands	118,400	65.9%	3.2%	30.9%
EKCEP	130,100	63.3%	3.0%	33.7%
Green River	78,700	78.3%	3.4%	18.3%
KentuckianaWorks	401,500	80.8%	2.7%	16.5%
Lincoln Trail	110,000	77.6%	2.9%	19.5%
Northern Kentucky	188,600	83.5%	2.5%	14.0%
South Central	122,300	77.8%	2.5%	19.8%
TENCO	102,800	71.5%	3.8%	24.6%
West Kentucky	147,300	75.1%	2.3%	22.7%
Total	**1,678,400**	76.8%	2.8%	20.4%

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota, www.ipums.org.

Table 8 shows the labor market status for individuals aged 16-24. Individuals in this age group are more likely to be unemployed than prime-age workers and much more likely not to be in the labor force. Younger individuals, aged 16 to 25, may want to work. However, for many, the wage they could earn is not enough to prompt them to seek formal employment in lieu of or while attending school.

Table 8
Labor Force Status of Individuals Who Between 16-24 Years Old by LWDA

	Total population	% of population	*Labor force status*		
			Employed	Unemployed	Not in labor force
Bluegrass	740,000	20.7%	58.0%	6.2%	35.9%
Cumberlands	320,000	6.5%	51.7%	8.6%	39.6%
EKCEP	352,000	6,8%	40.1%	5.5%	54.4%
Green River	213,900	4.8%	62.8%	4.3%	33.0%
Kentuckiana Works	1,019,400	11.0%	56.0%	7.6%	36.4%
Lincoln Trail	286,740	10.9%	66.0%	6.4%	27.6%
Northern Kentucky	480,300	11.0%	65.2%	4.5%	30.3%
South Central	325,000	13.8%	56.6%	5.6%	37.7%
TENCO	271,800	11.3%	54.5%	4.5%	41.0%
West Kentucky	411,800	12.6%	67.8%	3.6%	28.7%
Total	**4,420,500**	**11.9%**	**55.2%**	**6.7%**	**36.0%**

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota, www.ipums.org.

Table 9 shows the labor market status of individuals over 55. Approximately 65.9% of individuals 55 years or older are not in the labor force, while 33.2% are employed. The unemployment rate of this group is less than 1%. These statistics suggest that age significantly influences labor market behavior. As individuals age, they may prefer to spend their time in ways unrelated to work or their participation may be limited due to health concerns or disabilities, even if they would prefer to work.

Examining labor force status by age enables researchers and policymakers to understand when labor force status reflects voluntary nonparticipation due to individual preferences or needs and when underlying issues in the local job market may be present.

Table 9
Labor Force Status of Individuals Over the Age of 54 by LWDA

	Total Population	Percent of population over 54	*Labor force status*		
			Employed	Unemployed	Not in labor force
Bluegrass	740,000	26.5%	35.9%	0.5%	63.6%
Cumberlands	320,000	30.4%	25.8%	0.7%	70.8%
EKCEP	352,000	30.6%	21.9%	0.4%	77.8%
Green River	213,900	29.8%	32.8%	1.2%	66.0%

Kentuckiana Works	1,019,400	28.1%	37.0%	1.3%	61.7%
Lincoln Trail	286,740	28.2%	35.8%	0.7%	63.4%
Northern Kentucky	480,300	26.8%	38.2%	0.8%	61.0%
South Central	325,000	27.2%	33.0%	1.5%	65.6%
TENCO	271,800	30.7%	25.7%	0.7%	73.6%
West Kentucky	411,800	30.3%	32.5%	1.0%	66.6%
Total	**4,420,500**	**28.4%**	**33.2%**	**0.9%**	**65.9%**

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota, www.ipums.org.

Level of Educational Attainment

Table 10 shows the educational attainment of individuals 25 years and over in Kentucky compared to the rest of the United States. On average, Kentucky has a lower educational attainment than the country as a whole.

Table 10
Educational Attainment of U.S. v. Kentucky

	US	Kentucky
Less than high school	10.2%	10.5%
Highschool degree	25.9%	32.9%
Less than bachelors	27.7%	28.9%
Bachelor's and beyond	36.2%	27.8%
Total	**100%**	**100%**

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota, www.ipums.org.

Table 11 shows the labor force status by educational level for Kentucky. Historically, the education of the labor force has been a significant factor that businesses consider when choosing the location of proposed projects. In a research paper, it was found that firms' productivity is lower when the local labor force does not possess the skills needed by businesses (Morris et al. 2020). This study underscores the importance of Kentucky's strategy of raising the skill profile of residents in areas with employment rates and lower education levels than the state average. This may increase the labor force participation rate, improve the match between workers' skills and firms' requirements across different LWDAs, and increase the attractiveness of locating new businesses in different local areas.

Table 12 shows the educational levels of prime-age individuals in Kentucky's LWDAs. On average, 30.9% of prime-age individuals in Kentucky have a bachelor's degree or higher, while 61.6% have a

high school diploma or less. Only 8.5% of prime-age individuals had less than a high school education. The two areas with the highest percentage of individuals who did not graduate from high school are Cumberlands (12.6%) and EKCEP (12.3%). These LWDAs also have the lowest percentage of the prime-age population with a bachelor's degree or more. Close to 40% of the population living in the Bluegrass, Kentucky, and Northern Kentucky LWDAs have a bachelor's degree or higher, significantly higher than the other LWDAs in the state.

Table 11
Labor Force Status of Kentucky's Prime-age Population by Level of Educational Attainment

		Labor force status		
	Prime-age population	Employed	Unemployed	Not in labor force
Less than high school	144,800	47.8%	5.9%	46.3%
High school only	493,900	68.4%	3.6%	28.0%
Less than a bachelors	538,000	79.3%	2.9%	17.8%
Bachelor's and beyond	546,100	90.8%	1.1%	8.1%
Total	**1,722,900**	**77.1%**	**2.8%**	**20.1%**

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota, www.ipums.org.

Table 12
Educational Attainment of the Prime-age Population by LWDA

Workforce Development Area	Prime-age population	Less than high school	Highschool only	Less than a bachelors	Bachelor's and beyond
Bluegrass	279,000	6.8%	25.5%	27.9%	39.8%
Cumberlands	118,400	12.6%	40.9%	29.8%	16.7%
EKCEP	130,100	12.3%	35.0%	30.7%	21.0%
Green River	78,700	7.5%	33.5%	37.1%	21.9%
Kentuckiana Works	401,500	7.3%	23.7%	29.3%	39.7%
Lincoln Trail	110,000	9.3%	31.6%	38.5%	20.6%
Northern Kentucky	188,600	7.5%	23.7%	29.6%	39.4%
South Central	122,300	11.1%	32.7%	32.3%	23.9%
TENCO	102,800	8.0%	35.9%	35.2%	20.8%
West Kentucky	147,300	8.2%	33.0%	34.4%	24.3%
Total	**1,678,400**	**8.5%**	**29.3%**	**31.3%**	**30.9%**

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota, www.ipums.org.

Disability Status

In 2021, BLS conducted a national survey of individuals with self-reported disabilities to gain a deeper understanding of the employment barriers they face (Bureau of Labor Statistics, 2022). Individuals with disabilities reported that some of the major barriers to employment were:

- due to their own disability (78.9%)
- other reasons (19.5%)
- lack of education or training (12.0%)
- need for special accommodation at the job (10.5%)
- lack of transportation (10.3%)

Table 13 shows the employment status of prime-age individuals with disabilities by LWDA. Labor force participation among those with a disability is much lower than that of those without a disability. Approximately 21.7% of the prime-age workers in EKCEP have a self-identified disability, and of these individuals, only 28.2% are employed. The Cumberlands and Green River have the next highest percentage of individuals with a self-identified disability at 20.1 and 18.1% respectively.

Table 13
Employment Status of Prime-age Workers with Self-identified Disability

Workforce Development Area	Prime-age population	Self-identified disability	*Labor force status*		
			Employed	Unemployed	Not in labor force
Bluegrass	279,000	12.5%	48.6%	4.3%	47.0%
Cumberlands	118,400	20.1%	23.2%	8.3%	68.1%
EKCEP	130,080	21.7%	28.2%	2.2%	69.6%
Green River	79,700	18.1%	54.9%	3.5%	41.6%
Kentuckiana Works	401,500	12.1%	46.9%	4.7%	48.4%
Lincoln Trail	109,700	16.4%	41.6%	6.4%	52.0%
Northern Kentucky	188,600	11.7%	51.4%	4.5%	44.1%
South Central	122,300	15.6%	43.4%	3.9%	52.7%
TENCO	102,900	16.1%	35.6%	2.4%	62.0%
West Kentucky	147,300	16.8%	46.3%	2.1%	51.6%
Total	**1,678,400**	**14.9**	**44.2%**	**4.3%**	**53.5%**

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota, www.ipums.org.

Poverty

The 2024 U.S. Department of Health and Human Services poverty guidelines classify a family of four as living below the poverty level if its income is $31,200 or less. A one-person household is below the poverty level if it makes less than $15,060. These guidelines are updated annually.

Nearly 18% of Kentuckians lived below the poverty line in 2023. Table 14 reports the poverty rate of each LWDA using the poverty level as defined in that year. EKCEP and the Cumberlands have the highest percentage of their population under the poverty line at 31.7% and 25.2%, respectively. Northern Kentucky (10.7%) and Green River (14.6%) have the lowest percentage of their population in poverty.

Table 14
Percent of the Total Population at Different Poverty Levels

Workforce Development Area	Total population	*Poverty status*		
		100 % or lower	101 to 200 %	Over 200 %
Bluegrass	829,122	17.1%	15.8%	67.0%
Cumberlands	318,621	25.1%	21.9%	53.0%
EKCEP	366,516	31.7%	21.4%	46.9%
Green River	216,531	14.6%	19.4%	66.0%
Kentuckiana Works	1,020,775	14.9%	15.8%	69.3%
Lincoln Trail	279,200	16.3%	19.2%	64.4%
Northern Kentucky	466,483	10.7%	12.8%	76.5%
South Central	309,730	17.9%	21.8%	60.3%
TENCO	275,985	21.1%	19.9%	59.0%
West Kentucky	411,178	18.7%	19.8%	61.5%
Total	**4,494,141**	**17.9%**	**17.8%**	**64.2%**

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota, www.ipums.org.

Table 15 reports the prime-age population below the poverty line by labor force status. Not surprisingly, employment and labor force participation are less common among individuals in lower-income families than it is in the broader population.

Table 15
Labor Force Status of Individuals 100% or Below the Poverty Guideline by LWDA

Workforce Development Area	Prime-age population at or below the poverty guideline	*Labor force status*		
		Employed	Unemployed	Not in labor force
Bluegrass	34,200	33.8%	10.7%	55.5%
Cumberland	27,600	22.2%	8.3%	69.5%
EKCP	40,100	24.9%	6.5%	68.6%
Green River	10,800	37.9%	11.5%	50.6%
Kentuckiana Works	50,744	35.0%	8.8%	56.2%
Lincoln Trail	16,600	45.8%	3.7%	50.5%
Northern Kentucky	15,300	42.7%	3.6%	53.7%
South Central	18,800	51.6%	2.8%	45.6%
TENCO	19,900	27.1%	7.1%	65.8%
West Kentucky	25,900	38.2%	1.8%	59.9%
Total	**260,00**	**34.1%**	**6.8%**	**59.0%**

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota**,** www.ipums.org.

Race

Some racial groups experience the effects of stereotyping or discrimination and historical inequities, such as limited access to education or geographic differences. Racial information can provide insight into potential systemic or cultural factors affecting labor market outcomes. Table 16 reports the racial composition of the different LWDAs. KentuckianaWorks and Bluegrass have the most racially diverse populations.

Table 16
Racial Composition of Population by LWDA

Workforce Development Area	White	Black	American Indian or Alaskan Native	Asian	Other	Two or more races
Bluegrass	83.3%	6.7%	0.3%	2.2%	1.9%	5.5%
Cumberlands	93.9%	1.7%	0.3%	0.4%	0.5%	3.2%
EKCEP	94.6%	1.2%	0.2%	0.7%	0.1%	3.2%
Green River	87.6%	5.8%	0.2%	0.6%	1.6%	2.9%
Kentuckiana Works	71.7%	14.8%	0.2%	2.2%	2.1%	9.0%
Lincoln Trail	86.0%	6.5%	0.0%	1.2%	1.6%	4.6%
Northern Kentucky	89.2%	3.6%	0.1%	1.4%	1.5%	4.1%
South Central	84.9%	5.2%	0.6%	2.4%	2.1%	4.9%
TENCO	92.8%	1.9%	0.2%	0.2%	0.2%	4.6%
West Kentucky	85.5%	7.3%	0.1%	0.8%	1.0%	5.2%
Total	**84.3%**	**7.0%**	**0.3%**	**1.5%**	**1.4%**	**5.5%**

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota, www.ipums.org.

Table 17 shows the labor force status for prime-aged workers in Kentucky by race. Kentucky's Black and White populations have similar labor force participation rates. However, the state's Black population is more likely to be unemployed.

Table 17
Labor Force Status of Prime-Age Population by Race

Race	Prime-age population	*Labor force status*		
		Employed	Unemployed	Not in labor force
White	1,405,500	77.8%	2.6%	19.6%
Black	135,000	73.8%	4.3%	21.9%
Native American	6,000	83.8%	0.0%	16.2%
Asian	35,200	80.2%	3.9%	16.0%
Two or more races	109,000	70.4%	3.3%	26.3%
Other	32,300	81.7%	0.8%	17.6%
Total	**1,722,900**	**77.1%**	**2.8%**	**22.1%**

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota, www.ipums.org.

Veteran Status

A veteran is a person who served in the armed forces and who was not dishonorably discharged. Nationally, more than half of the veterans in the civilian non-institutional population are over the age of 65, and 65.2% of veterans are older than what the BLS classifies as the prime-age workforce.

In 2023, veterans in the United States had a higher labor force participation rate than nonveterans until the age of 65 years and above. Male veterans aged 45-54 years have an 83.4% labor force participation rate, which drops to 62.5% for veterans 55-64 years old (compared to a 71.8% participation rate for male nonveterans of the same age).

Table 18 shows the labor force status of prime-age veterans in Kentucky by LWDA. Lincoln Trail has a significantly higher percentage of veterans in its prime-age labor force than the other LWDAs. Approximately a third of prime-age veterans in Cumberlands and TENCO are not in the labor force, which is significantly higher than the state average.

Table 18
Labor Force Status of Prime-Age Veterans by LWDA

Source: 2023 American Community Survey 1-year data, US Census Bureau, accessed via IPUMS USA, University of Minnesota, www.ipums.org.

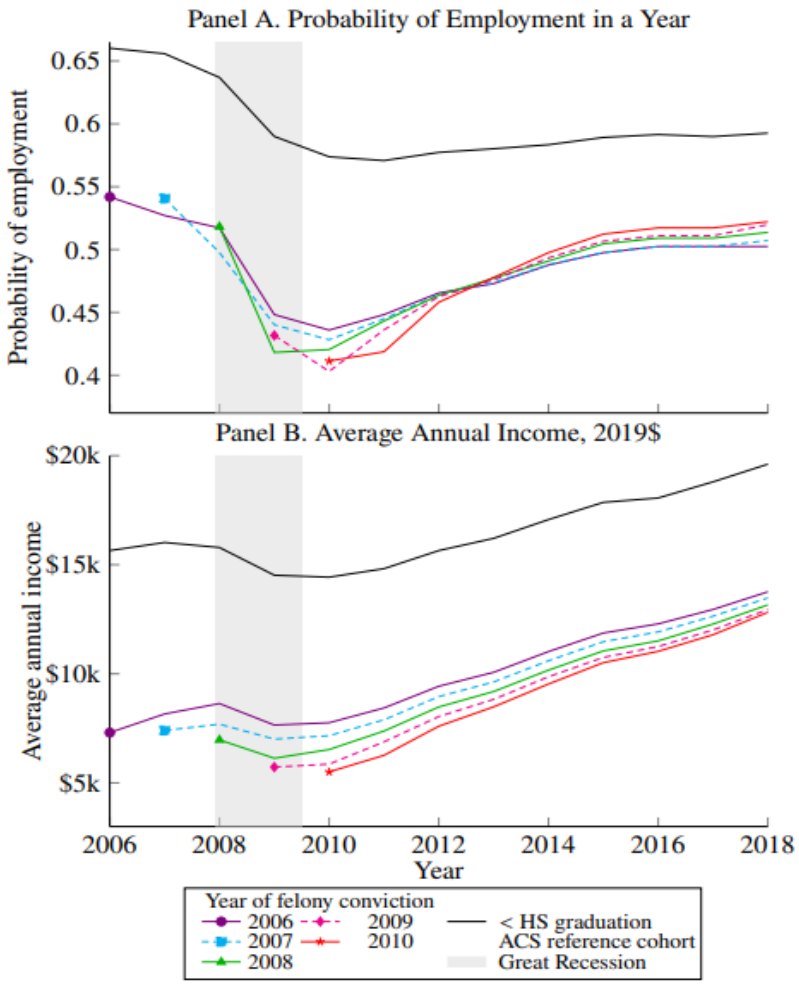
Workforce Development Area	Prime-age population	Veteran	Labor force status		
			Employed	Unemployed	Not in the labor force
Bluegrass	279,000	4.4%	82.0%	1.4%	16.6%
Cumberlands	118,400	3.2%	77.4%	1.7%	20.9%
EKCEP	130,100	2.2%	70.7%	0.8%	28.5%
Green River	78,700	2.8%	88.8%	0.0%	11.2%
Kentuckiana Works	401,500	3.5%	77.4%	2.0%	20.6%
Lincoln Trail	110,000	6.1%	79.5%	1.7%	18.8%
Northern Kentucky	188,600	4.0%	75.4%	5.6%	18.9%
South Central	122,300	3.3%	64.6%	1.2%	34.2%
TENCO	102,800	4.4%	78.2%	3.1%	18.6%
West Kentucky	147,300	4.8%	90.2%	0.5%	9.4%
Total	**1,678,400**	**3.9%**	**79.0%**	**2.0%**	**19.0%**

Incarceration

Formerly incarcerated individuals face numerous disadvantages when looking for employment. These individuals tend to have more health problems and a lower level of education and training than the average population (Ewert & Wilghen, 2011). These employment disadvantages are compounded by incarceration due to stigma and the gaps in an individual's employment history caused by their incarceration.

Finlay and Mueller-Smith found that, on average, formerly incarcerated individuals make $3,000 to $7,000 less per year and are much less likely to be employed than individuals who were not incarcerated and have less than a high school degree. Given that individuals over the age of 24 with less than a high school diploma earn an average of $32,500 annually at the time this analysis was written, the difference in earnings for individuals who were formally incarcerated is significant.

Figure 13
Probability of Employment and Average Annual Income of Formerly Incarcerated Individuals



Source: Finlay, Keith, and Michael Mueller-Smith. *Justice-involved Individuals in the Labor Market*. ADEP Working Paper, 2021.

In 2024, an average of 19,200 individuals were incarcerated in Kentucky at any given time, and approximately 48,200 individuals were under some supervision, probation, or parole (Kentucky Department of Corrections, 2025). Table 19 shows the number of individuals under supervision in each LWDA in 2020.

Table 19
Individuals under Dept. of Corrections Supervision by LWDA

Workforce Development Area	Total
Bluegrass	6,164
Cumberlands	3,242
EKCEP	3,747
Green River	2,811
Kentuckiana Works	9,496
Lincoln Trail	2,643
Northern Kentucky	4,007
South Central	3,341
TENCO	2,005
West Kentucky	5,012
Total	**42,468**

Source: Kentucky Center for Statistics, The number of individuals on active probation or parole supervision. 2020.

Single-parent Households

Single mothers head 71.8% of all single-parent households in Kentucky, and single fathers are the head-of-household for only 28.2%. Nationally, in 2022, only 8.8% of households with children under 18 years had no working parent.

For single-parent households, the percentage of parents without employment was much higher than that of two-parent households. Approximately 25% of mothers and 14.3% of fathers were not employed. Table 20 shows the number of individuals who were never married living with their children by LWDA.

Table 20
Never Married Parents Living with Their Own Children by LWDA

Workforce Development Area	Percent of parents who were never married living with their child	*Labor force status*		
		Employed	Unemployed	Not in labor force
Bluegrass	13.8%	67.6%	9.9%	22.4%
Cumberlands	11.4%	67.6%	6.1%	26.2%
EKCEP	14.3%	66.0%	25/7%	31.4%
Green River	14.6%	84.7%	3.9%	11.4%
Kentuckiana Works	16.6%	71.2%	10.3%	18.4%
Lincoln Trail	18.1%	67.0%	7.9%	25.0%
Northern Kentucky	14.7%	83.3%	4.5%	12.1%
South Central	10.5%	77.0%	2.1%	21.0%
TENCO	11.1%	72.4%	12.1%	15.4%
West Kentucky	13.1%	80.1%	3/3%	16.6%
Total	**14.3%**	**72.8%**	**7.2%**	**20.0%**

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota, www.ipums.org.

Single mothers were particularly less likely to work when they had children under the age of 6. In 2022, 31% of single mothers were not employed when they had children under the age of 6 in the United States. This non-employment is nearly 10% higher than single mothers with older children.

Displaced Homemakers (per WIOA)

Per WIOA, a displaced homemaker is an individual who has been providing unpaid services to family members in the home and who has been depending on the income of another family member but is no longer supported by that income; or is the dependent spouse of a member of the Armed Forces on active duty and whose family income is significantly reduced because of a deployment, a call or order to active duty, a permanent change of station or the service-connected death or disability of the member; and is unemployed or underemployed and is experiencing difficulty in obtaining or upgrading employment.

When a displaced homemaker, or more commonly known as stay-at-home spouse, tries to reenter the labor market, either voluntarily or due to necessity, it often takes more time to find a position, and they tend to be paid less than their peers who stayed in the labor force.[2] This is known as the motherhood/career-break penalty. Businesses, particularly in the post-COVID labor market, are trying to

help people reenter the workforce by creating "returnships" focused on easing the transition into the labor force. These "returnships" are often targeted to highly skilled women.

Easing the "back-to-work" transition for individuals who have been out of the labor force due to familial responsibilities, military service, or returning from retirement may be an expedient way business can address current post-pandemic labor shortages (Cohen, 2021).

Farm Workers

Farm workers are not included in most labor market statistics, which measure non-farm employment. The major employment statistics discussed in the media and in this paper concern "total nonfarm employment." However, the United States Department of Agriculture (USDA) collects data about agricultural workers in its "Census of Agriculture," which is conducted every five years. The estimates from the latest 2022 survey indicate that, since the 2017 Agricultural Census, the number of agricultural workers, both paid and unpaid, has declined significantly.

In 2022, USDA estimated that there were 40,500 hired farm laborers, nearly a 12,500 decrease in the number of hired farm workers since 2017. There were an estimated 50,500 unpaid agricultural workers in Kentucky, approximately 30,000 less than there were in 2017. Unpaid agricultural workers are often the operators of the farm, including members of the operator's family. Of the hired laborers, 5,000 were migrant workers, nearly half of the estimated number of workers in 2017. Approximately 12% of the migrant workers were contracted laborers, meaning they only work on the farm for a set period.

A USDA survey found that, nationally, farm workers have less formal education than the average US employee. Approximately 65% of farm workers have a high school education or less, compared to 37% of the total US workforce.

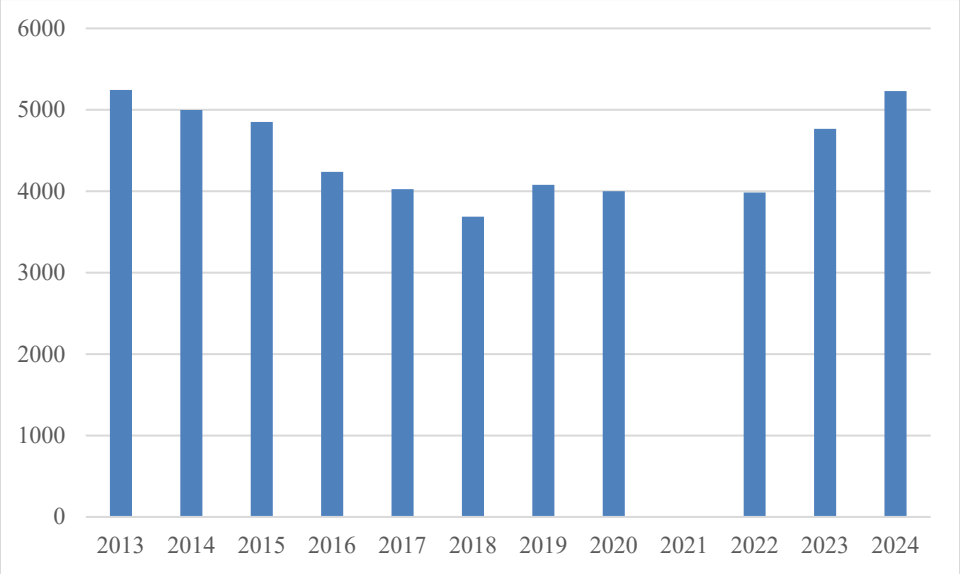
According to these national statistics, farm workers may need assistance transitioning to other sectors. They may not be as competitive in the non-farm labor market due to the increased likelihood that they have less than a high school diploma or potentially have limited English-speaking skills.

Homelessness

The Kentucky Housing Corporation estimated that in 2025, approximately 5,700 individuals in Kentucky were homeless on a typical day. The U.S. Interagency Council on Homelessness estimates that approximately 391 are veterans, and 1,000 people experience chronic homelessness.

Figure 14 shows the estimated number of homeless individuals in Kentucky over time, as estimated by the Kentucky Housing Corporation. The point-in-time count indicates that homelessness in Kentucky increased by 1,200 individuals from 2019 to 2024, an estimated 22% over these 5 years. This growth in homelessness in 2022 marks a shift from the pre-pandemic trend. Since 2013, the number of homeless individuals had either declined or remained relatively constant until it began to rise in 2022.

Figure 14
Estimated Kentucky Homelessness: 2013-2024



Note: The Kentucky Housing Corporation did not publish count numbers for 2021 due to pandemic-related interruptions of data collection.

Source: K-Count, Kentucky Housing Corporation, 2013-2024.

Low Literacy

The National Center of Education Statistics (NCES) estimated that 19-25% of Kentuckians over the age of 16 have a literacy level at or below Level 1. Adults at Level 1 can read short texts and understand their meaning sufficiently to perform tasks such as filling out a brief form. Adults with a reading level below Level 1 may be functionally illiterate but may still be able to understand words related to familiar topics.

On the county level, there are significant disparities between counties, ranging from 11% (Oldham) to 44% (Clay) of the population who are reading at or below Level 1. According to the Occupational Requirements Survey, only 2.3% of jobs in the United States do not require literacy skills (ORS, 2022). Individuals with reading difficulties have substantially fewer employment opportunities than those with higher literacy levels.

Limited English Proficiency

Approximately 3.5% of Kentucky's prime-age residents have limited English proficiency (Table 21). Despite this barrier, labor force participation among those with limited English proficiency is higher than the general population's labor force participation rate. Nevertheless, limited proficiency in the English language can limit a worker's ability to transition between sectors. Nearly 35% of jobs require

speaking either frequently or constantly. This is particularly notable for management, a high-paying occupational category, where 46.4% of positions require frequent or constant speaking (ORS, 2022).

Table 21
Labor Force Status of Prime-age Individuals with Limited English Proficiency

Workforce Development Area	Prime-age population	Limited English proficiency	*Labor force status*		
			Employed	Unemployed	Not in labor force
Bluegrass	279,000	4.7%	79.3%	2.7%	18.0%
Cumberlands	118,400	1.2%	65.9%	3.2%	31.0%
EKCEP	130,100	0.3%	63.3%	3.0%	33.7%
Green River	78,700	2.9%	78.3%	3.4%	18.3%
Kentuckiana Works	401,500	6.1%	80.1%	2.7%	16.5%
Lincoln Trail	110,000	2.0%	77.6%	2.9%	19.5%
Northern Kentucky	188,600	2.9%	83.5%	2.5%	14.0%
South Central	122,300	5.1%	77.8%	2.5%	19.8%
TENCO	102,800	0.8%	71.5%	3.9%	24.6%
West Kentucky	147,300	1.6%	75.1%	2.2%	22.7%
Total	**1,678,400**	**3.5%**	**76.8%**	**2.8%**	**20.4%**

Source: 2023 American Community Survey 1-year data, US Census Bureau. Accessed via IPUMS USA, University of Minnesota, www.ipums.org.

Long-term Unemployment

Individuals who have been unemployed for longer than 27 weeks are experiencing long-term unemployment. Long-term unemployment is associated with skill degeneration, discouragement, and the stigma potential employers may associate with long-term unemployment. Men who experience long-term unemployment are more likely to withdraw from the labor market. Estimates about the wage effect of long-term unemployment vary from an 11-25% wage reduction compared to individuals who experienced short-term unemployment (Rothstein, 2016).

Native American and Alaskan Natives

Native Americans have very disparate labor market outcomes compared to other groups. In January 2022, the Native American national unemployment rate was 11.1% (compared to a 4% national average). Additionally, their employment-to-population ratio was 7% below the national average (BLS, 2022). Kentucky has a very small Native American population, less than a tenth of a percent of its total population.

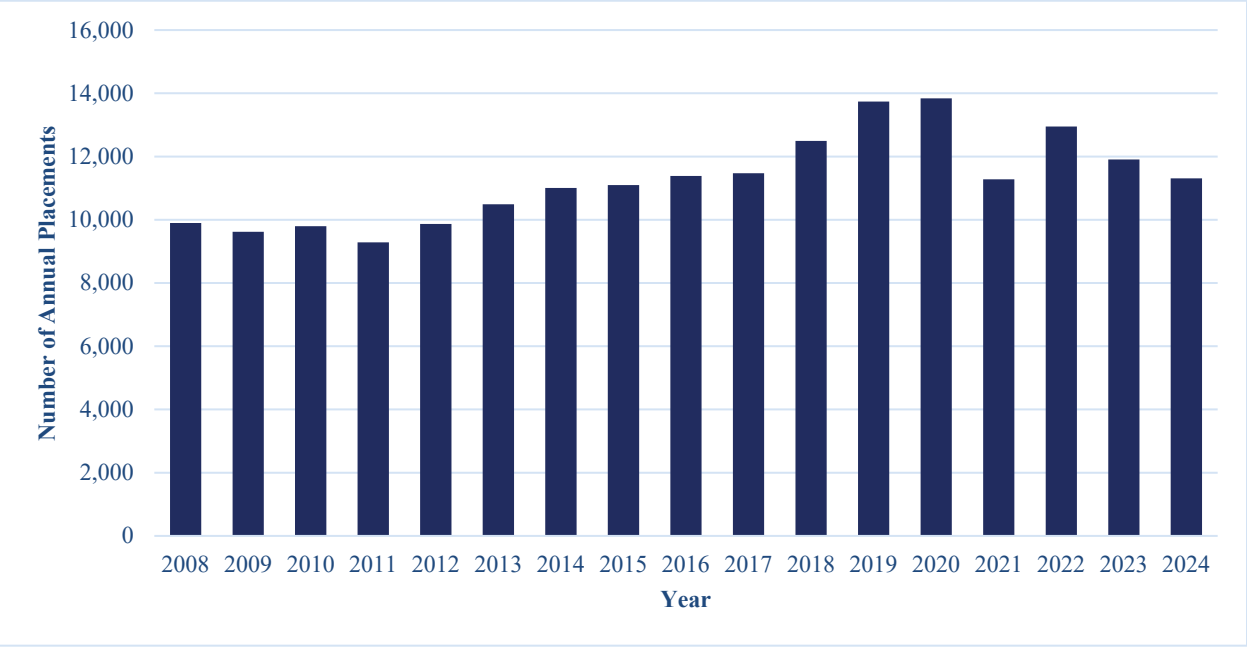
Foster Care

In 2024, 11,308 Kentucky children were placed in out-of-home placements, in a foster family, or an institution. Individuals who turn 18 in foster care report earnings that are 50% lower than other adults

with similar educations by the time they are 26 years old (Bald et al. 2022). While children who age-out of foster care at 18 years have negative labor market outcomes, there is evidence that extending foster care beyond 18 years for at-risk youth may ameliorate some adverse labor market effects associated with the foster care system (Bald et al. 2022).

Figure 15 shows the number of Kentucky out-of-home placements by year. According to the Kentucky Citizen Foster Care Review Board's 2024 Annual Report, approximately 25% of the children actively involved in Kentucky's foster care system were 16-20 years old. Of the 4,700 children who exited the foster care system in FY 2024, approximately 11% of them aged-out, or nearly 520 individuals.

Figure 15
Average Number of Children in Foster Care by Year



Source: Kentucky Citizen Foster Care Review Board Annual Report, Department of Family & Juvenile Services, 2008-2024.

C. Comparison of Economic and Workforce Analytical Conclusion

By identifying Kentucky's employment trends and the barriers that prevent many of Kentucky's residents from participating in the workforce, policymakers can better position training and other programs to ensure that the state's workforce has the skills that employers will need in the coming years.

The economic analysis suggests that much of Kentucky's employment growth will continue to occur in sectors such as manufacturing and healthcare which account for a large portion of Kentucky's employment and likely represent much of the employment growth going forward. Helping workers

develop the skills needed by these sectors will be crucial to meeting the needs of Kentucky's growing economy.

While identifying emerging sectors could also allow the state to position workforce development resources to help foster these sectors, accurately identifying these sectors early is challenging. Today, high-growth sectors often do not continue to grow at the same rate or eventually decline. As a result, the returns to developing skills that are specific to an emerging sector are more uncertain. Instead, helping workers create a portfolio of transferable skills through general education or skills training programs may be a more effective strategy to meet employers' future needs. Examples of these highly transferable skills include technical and social skills, as well as efficient resource management. Focusing on developing these skills can create a highly adaptable workforce that is more resilient against changing economic conditions.

The workforce analysis points to several significant barriers that limit participation in the workforce. For example, a significantly higher percentage of Kentucky's population has a self-reported disability (14.9%) compared to the national population (13.4%). The three most reported difficulties were ambulatory, cognitive, and hearing difficulties. The type of difficulty individuals experience can influence the benefits they can obtain from particular training or support offered. The rise of remote work and technological investments may provide new opportunities for individuals whose disabilities keep them from participating in the traditional labor market.

Kentucky also has a significantly lower proportion of college graduates compared to the national average (27.6% versus 36.2%). While transferable skills can be learned outside traditional academic environments, this indicates that Kentucky's workforce may lack some of the skills required for higher-paying jobs that are more prevalent in the rest of the United States. Labor force participation is considerably lower for those with less education.

Kentucky also has a much higher portion of its population in poverty than the US average (17.9% versus 12.6%). Often, poverty is associated with other demographic characteristics that make it challenging to participate in the workforce. For example, individuals in poverty can also face challenges attributable to their limited resources, such as insufficient childcare or limited access to transportation.

These are just a few examples of how Kentucky's workforce differs from the United States' workforce. It is essential to understand the effect of the various demographic barriers, as they can affect the types of skills, training, and support that would be most effective at addressing the particular barriers workers face.

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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 [6] and optional one-stop delivery system partners.[7]

[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.

A. The State's Workforce Development Activities

Commonwealth of Kentucky's workforce development, education, and training activities connected to the core WIOA programs are housed within the Department of Workforce Development (DWD) at the Kentucky Education & Labor Cabinet (ELC). Title I programs (adult, dislocated worker, and youth) are administered by the 10 Local Workforce Development Boards (located across the five regions of Kentucky, pictured below) and their respective service providers, while Title II program (Adult

Education and Family Literacy) is within the Kentucky Office of Adult Education, and Title III (Wagner-Peyser) is within the Career Development Office. Title IV (Vocational Rehabilitation) is within the Office of Vocational Rehabilitation (OVR). DWD also houses the state registered apprenticeship agency known as the Office of Industry and Apprenticeship Services (OIAS) and the Office of Educational Programs, which has a targeted mission of growing youth employment through the Governor's Everybody Counts initiative. Furthermore, the Kentucky Workforce Innovation Board (KWIB) is administratively attached and within DWD.

In addition to the core WIOA programs, this Combined State Plan incorporates the Jobs for Veterans State Grant (JVSG), Trade Adjustment Assistance (TAA), Migrant and Seasonal Farmworkers (MSFW), and Unemployment Insurance programs. JVSG, TAA, and MSFW are in the Career Development Office (CDO) within DWD.

Program	Participants PY23	Participants PY24	Trainings PY23	Trainings PY24	Median Quarterly Earnings / Skills Gain PY23	Median Quarterly Earnings / Skills Gain PY24
Title I – Adult	2,792	4,287	1,496	2,225	$8,571	$8,722
Title I – Youth	1,523	2,013	522	694	$4,789	$5,035
Title I – Dislocated Worker	238	324	164	246	$11,250	$9,951
Title II – Adult Education & Family Literacy	13,221	15,994	Not Applicable	Not Applicable	55.9%	62.1%
Title III – Wagner-Peyser	27,021	24,157	Not Applicable	Not Applicable	$8,117	$8,300
Title IV – Vocational Rehabilitation	45,812	49,003	4,557	5,358	$23.30/hr	$23.62/hr

Furthermore, within DWD, services from OVR such as providing assistive technologies opens opportunities for individuals with disabilities to attain employment. The individuals that touch the workforce development system can compete for a wider array of jobs and careers. Similar advancement opportunities are also possible through the various training programs DWD offers, especially in the growing possibilities with registered apprenticeships.

In Program Year 2024, Kentucky added 2,456 new apprentices, bringing the statewide total to over 5,500 active participants. Apprentices progress through wage increases and milestone achievements, earning industry-recognized credentials while gaining practical experience. Incumbent worker training complements this model by helping employees maintain certifications, upskill, and advance in their careers which strengthens both business operations and retention.

Targeted apprenticeship initiatives also address critical workforce needs. The Early Childhood Education Apprenticeship supported 125 apprentices across 41 employers in Program Year 2024, part of an effort that has served more than 300 participants statewide. These programs expand credential attainment while helping address childcare workforce shortages. Likewise, the Grow Your Own

Registered Teacher Apprenticeship, promoted through Kentucky Department of Education's GoTeachKY, helps districts build teacher pipelines by pairing classroom experience with mentorship and academic training.

These Kentucky registered apprenticeship programs are designed to be industry-driven and are structured to meet the demands of the talent marketplace, especially when considering early childhood education. With early childcare options limited in many parts of the commonwealth, building an infrastructure of skills attainment, workplace experience, and support for employers who are critical to the function of their local economies takes innovation and an integrated workforce system.

Furthermore, apprenticeship programs in education are in alignment with the Kentucky's key sectors and the sector of "education" as identified by KWIB. Taking into consideration employer demand, occupational growth over the next 10 years, and occupational wages, education along four other sectors was identified through a quantitative and qualitative process. The approach taken embodies the pillars of industry-driven strategies, worker mobility, and innovation within the *America's Talent Strategy.*

Registered Apprenticeship provides beneficial benefits to both employers and apprentices:

- Registered Apprenticeship is an industry-driven, high-quality career route that allows employers to develop and train their future employees. It guarantees that the strategy is industry-specific and meets the demands of businesses and the labor market.

- Paid Work Experience: Registered Apprenticeship participants acquire practical, hands-on experience. They collaborate with experienced experts, contributing to real-world projects and responsibilities while earning a wage.

- Progressive Wage Increases: As apprentices continue through their training, their wages are gradually increased to encourage skill development and provide financial stability for participants.

- Related Technical Instruction: In addition to on-the-job training, apprentices receive classroom instruction. The mix of experience and academic understanding improves their total skill set.

- Portable, Nationally Recognized Credential: After completing the Registered Apprenticeship program, people receive a credential that is recognized throughout the country. This accreditation confirms their expertise and increases their employability.

Registered Apprenticeship not only benefits employers by creating a talent pipeline but also provides individuals with a pathway to gain valuable skills, earn a wage, and build a successful career. Other industry operated work-based learning programs have also been growing, such as KY-FAME.

Complementing these services, DWD and the workforce development system brings value to both the employer and the individual through the Work Opportunity Tax Credit (WOTC). WOTC offers benefits to career seekers and positively impacts individuals by:

- Job Opportunities: WOTC encourages employers to hire job seekers who face challenges in finding work. By incentivizing employers, the program creates more job openings, increasing the chances for career seekers to secure employment.

- Financial Benefits: When career searchers are recruited through WOTC, they not only find work but also make money. Consistent employment contributes to financial security and the opportunity to contribute as taxpayers.

- Overcoming Obstacles: Many career seekers confront obstacles such as a lack of professional experience, a criminal background, or other hurdles. WOTC gives them the opportunity to overcome these barriers and find meaningful employment.

The Work Opportunity Tax Credit program opens doors for career seekers, supports financial well-being, and contributes to a more diverse and inclusive workforce.

Overall engagement with businesses by the workforce development system also brings value to workers as opportunities are increased to be placed in the best fitting position and company. During Program Year 2024, over 45,000 businesses engaged with Kentucky's workforce system. Many returned for additional services, underscoring the system's value as an ongoing partner in workforce and economic development. Through both in-person and digital collaboration, Kentucky's workforce network provides companies with innovative solutions and responsive support.

These performance measures demonstrate the value that the workforce development system brings to the individual customer as employment barriers are removed, training is undertaken, and skills are attained – as a result, all leading to better employment opportunities and a better quality of life.

Title I – Training Related to Sector Strategies

Education and training needs derived from businesses are executed in a multitude of ways, including through sector strategies that are led by local workforce development areas. Here are a few that highlight work in the Commonwealth identified five in-demand sectors: healthcare, manufacturing and logistics, construction, education, and professional, scientific, and technical services.

IT - CODE KENTUCKY

Through a Governor's Discretionary grant, the Commonwealth invests in an IT training program called Code Kentucky, operated by KentuckianaWorks local workforce development board. Code Kentucky is based on the model used by Code Louisville, which has trained and placed more than 800 people in software development and related IT jobs. The programs are also operated by an overlapping staff team and share mentors and curriculum.

In its second year in operation, Code Kentucky began expanding to serve a broader portion of the state through a partnership with SOAR (Shaping Our Appalachian Region). Code Louisville and Code Kentucky helped place 115 people into technology jobs in the past program year at an average wage above $28 per hour.

In partnership with KentuckianaWorks, the Northern Kentucky Area Development District (NKADD)/Northern Kentucky Workforce Investment Board (NKWIB) supports Code Kentucky in the Northern Kentucky region.

Most recently, 115 students from the Northern Kentucky region were enrolled. There has been a 42% job placement rate for NKY program graduates, with an average starting wage of $31.34/hour.

Employers from the IT sector have a continued desire to hire candidates with “work experience” and relevant credentials despite the shortage of available talent. NKY WIB plans to work more strategically with IT sector employers in the coming year to identify mutually beneficial solutions for the employers and the Code Kentucky graduates.

Construction - KENTUCKIANA BUILDS

Governor's Discretionary grant also provides complementary funds to the KentuckianaWorks pre-apprenticeship construction training program called Kentuckiana Builds. Kentuckiana Builds was created in 2016 in partnership between KentuckianaWorks Board and the Louisville Urban League to respond to the need for a pipeline of trained construction employees and to increase the number of minorities and women going into the sector regionally. Kentuckiana Builds provides an exemplary program that is started and funded locally and supported with state funds as an investment in an effective model.

In February 2023, leaders from the Louisville Urban League, KentuckianaWorks, and private-sector employers gathered to celebrate the 500th graduate of the program. Of those graduates, nearly 90% are people of color, and more than a quarter are women (compared to just 10% female representation industry-wide).

Construction - Heavy Equipment Committee & Pathway

The South Central Workforce Development Board (located in the South Central Region) started a Heavy Equipment Sciences career pathway for K-12 students, which was launched near the beginning of the academic school year after the SCWDB secured a statewide reserve grant to purchase four training simulators. There were 24 students enrolled; 21 students completed the program in May 2023, and 18 of those students went on to receive full-time employment or internships with local construction companies. An adult cohort was provided in the summer of 2023 with ten students enrolled and supported with a combination of WIOA and NDWG funding support.

Healthcare – TENCO & EKCEP WIBs

Throughout the last few years, the TENCO WDB (located in the East Region of Kentucky) has supported continuous educational improvement in the healthcare field. This need was determined after listening to sector industry groups involved in the Talent Pipeline Management project. The Board established funding to move individuals through a career pathway such as Nurse Assisting, Licensed Practical Nurse, Registered Nurse, and even higher education like Physician Assistant and Nurse Practitioner. Dedicated funding provides a skilled talent pipeline for local businesses while providing individuals with skills that provide them with advanced employment opportunities and higher wages for their families. The Board expends $50,000.00 per year on Career Pathway Projects.

Also in the East Region, Eastern Kentucky Concentrated Employment Program (EKCEP) expanded its Healthcare Pathway Partnership Program (H3P), formed in PY 2021 and funded by a US Department of Labor H-1B Rural Healthcare Grant. H3P assists eligible Kentuckians with important financial assistance and career navigation services to help ensure they are successful in training for and transitioning to healthcare careers. The program's expansion made assistance available for eligible students enrolled with additional training providers, increasing opportunities for students throughout the service area. As of October 2023, H3P has served 498 Kentuckians, including 295 people with paid services, to either begin or complete training for a healthcare career.

To serve the region’s employers more effectively and better align with state and federal workforce priorities, EKCEP in PY22 placed added emphasis on workplace training and ramped up efforts to initiate registered apprenticeships within the service area, resulting in the agency's first registered apprenticeship in early PY23 in collaboration with Hazard Community and Technical College, Alpha Mechanical Services, and Local 248.

Title II - Adult Education & Literacy Act

Kentucky Adult Education assists Kentuckians in improving the quality of their lives through education, training, and employment. Services and programs are governed by WIOA 2014, Sections 200-243, specifically Sections 202 and 203 regarding the purpose and associated definitions, and Sections 225, 231, and 243 regarding the delivery of services and activities. In addition, Kentucky Senate Bill 1 from the 2000 Regular Session (KRS 151b.400-410) addresses the requirements for delivering adult education services in the commonwealth. In this plan, there are references to the overarching Kentucky Adult Education system, referring to the statewide network including contracted eligible service providers, as well as the administrative office indicated as Office of Adult Education (OAE).

Kentucky Adult Education is committed to being a valuable WIOA partner and is embedded within the Kentucky WIOA partnership community. It provides Title II services to support and align with the efforts of Title I, III, and IV partners and support agencies. The focus of Adult Education in Kentucky is to mitigate barriers to education, training, and employment through co-enrollment across the WIOA partnership community. Integrated Education and Training (IET), Workplace Literacy Programs (WPL), and Integrated English Literacy and Civics Education (IELCE) programs are opportunities to address the needs of Kentuckians by leveraging the efforts of all WIOA partners. The work includes partnerships across the non-profit sector, such as the Revive Life House partnering with Jessamine County Adult

Education and Anderson Cleaning to develop workplace skills to include mock interview sessions with a pathway to second chance employment with Anderson Cleaning; the private sector, such as the English language acquisition and essential working skills to assist new hires become trained on safety and working standards with Amazon; and the public and quasi-public sector, paraeducators (18 total IET & WPL) programs across local school districts in the state as well as pathways for staff members to transition to be teachers to address the teacher shortage in Kentucky.

In addition, Kentucky Adult Education continues to expand partnerships to support those in recovery and who have criminal records. OAE, in conjunction with the Kentucky Justice and Public Safety Cabinet (JPSC), the Administrative Office of the Courts (AOC), the Cabinet for Health and Family Services (CHFS), and the 18 selected counties per KRS 533.270-290, assists with the administration of the Behavioral Health Conditional Dismissal Program which is designed to provide eligible participants charged with a qualifying offense an alternative to incarceration by participating in treatment and recovery support services and education and training, resulting in dismissal of the charges upon successful completion of the program. Additionally, Kentucky Adult Education oversees the Putting Kentuckians First (PKF) Program, which provides education, training, and employment services and opportunities to Kentuckians transitioning out of jails.

PKF is administered by the Reentry and Employment Services (RES) Branch and provides transition and pre-release training support for individuals in local jails and detention centers in Kentucky. The RES Branch partners with the Department of Corrections (DOC), local county jails, and courts across the commonwealth to develop pathways for education, training, and employment for Kentuckians transitioning out of jails/prisons through a robust pre-release program.

Through coordinated efforts across the adult education local provider network, family literacy services and activities are readily available to those transitioning out of jails who are parents or serve as a primary provider, mentor, etc., within a family structure. ELC plays a pivotal role in the Second Chance Employers and Recovery Ready Communities Council process to ensure that transitioning and recovering working-age Kentuckians receive the workforce preparation, workplace training, and supportive services necessary for employment and career advancement. Kentucky Adult Education views transitioning and recovering individuals from correctional facilities as candidates for services under the Special Rule in Section 231 of WIOA. Per Section 231, attempts are made to partner with other state agencies and stakeholders to provide services to include but not limited to digital literacy and Artificial Intelligence (AI) awareness and application for these individuals, but Kentucky Adult Education will be prepared to provide services if partnerships cannot be established.

Title III – Wagner-Peyser

The Career Development Office (CDO) is the agency responsible for completing the Title III Wagner-Peyser program. CDO is setting the delivery model to reach individuals with career services early and effectively, which includes the CDO Regional Program Managers initiating weekly Orientation opportunities for partners to get engaged. These orientations enable the career centers to showcase their

portfolio of products and services. Partner staff members participate by presenting/reviewing 2-3 slides about their service offerings.

The audience consists of:

- RESEA participants (requirement associated with UI)
- Career center customers (signed up to attend)

Kentucky Career Center (KCC) Partner Staff invites:

- Employers are invited to speak at this orientation to highlight their job openings
- Employers set up recruitment tables at the career center on orientation days
- KCC Partner Staff obtain referrals from the orientation.

Employer Engagement & Hiring Events

Goals of consistency, flexibility, and connectivity with employers have been the focus. CDO staff consistently stayed engaged with caseload customers through direct communication, constant sharing of hiring event flyers on social media, through the RESEA workshop, and posting employment opportunities at the center. Open communication with several partnering and local agencies in each area has been instrumental. Further, more job seekers, job fairs, virtual conversations, and customer assessments showed interest in more intensive services, which increased employment outcomes for customers who participated.

Partner Engagement

CDO has been working to streamline the referral process with several partner agencies to assist customers once barriers have been identified. The OVR referral in one area was reduced from a 5-page document to simply providing the individual's contact information and a brief synopsis of the perceived barrier. CDO is working with partners to improve their participation in CDO-scheduled orientation workshops with partners not housed in the comprehensive center. CDO has received positive comments from consumers and the staff of the different partner agencies. These interactions are breaking down some of the competitive barriers that have been in place in the past.

Title IV - Vocational Rehabilitation

The Kentucky Office of Vocational Rehabilitation (OVR) has engaged in many projects to enhance services and increase our adherence to federal and state mandates. One focus area of OVR was to enhance services using technology platforms. Consumers are allowed virtual or in-person services throughout their work with agency staff. The service is especially beneficial to individuals with disabilities who experience transportation barriers that prevent them from engaging in programs that enhance their employment skills.

To promote an inclusive workforce, Employment First became law in July 2022. As a result, Kentucky established the Employment First Council administered by the Office of Vocational Rehabilitation. Employment First will help ensure meaningful employment, fair wages, and career advancement for disabled Kentuckians. It will significantly advance efforts to realize a truly inclusive workforce in Kentucky, strengthen its economy, and improve the quality of life for citizens with disabilities across the Commonwealth. In 2023, OVR, along with the Council, received technical assistance from the Department of Labor (DOL), Office of Disability Employment, and the National Expansion of Employment Opportunities Network (NEON) project to advance the efforts of Employment First.

Another program called "RETAIN Kentucky" conducted the Inclusive Workforce Summit: Engaging the Talent of Kentuckians with Disabilities. An inclusive workforce is one in which the unique skills, contributions of qualified individuals, including those with disabilities, are actively recruited, valued, and integral to success. It is an environment where the engagement, development, retention, and advancement of an increasingly skilled and diverse workforce is promoted and supported across all employment sectors and levels. The one-day event had over 250 attendees. Another key strategy of RETAIN Kentucky's efforts to promote multisystem improvement, innovation, and change is the Inclusive Worker Health Leadership Network (IWHLN). This network, comprised of medical professionals, public health leaders, employers, and workforce development, focuses on coordinating state and local initiatives to accelerate opportunities for Kentuckians to stay at work or return to work. RETAIN Kentucky is a grant through the Department of Labor, Office of Disability and Employment.

Workforce Partners within DWD

Everybody Counts

Everybody Counts is a youth-focused initiative supporting successful transitions from high school to the workforce while ensuring that all 14 WIOA program elements are met and personalized for in-school students. The program emphasizes individualized career planning, academic support, and targeted work-based learning opportunities, guiding students to align their studies with career goals, access tutoring, and explore postsecondary education or training pathways. Specialized services are provided for at-risk students in alternative education programs, helping them achieve educational and career milestones.

Career coaches are embedded full-time in over 15 high schools across seven school districts, including five alternative education programs, providing mentorship, leadership development, and ongoing support during and after high school. Services include access to paid and unpaid work experiences, such as internships, apprenticeships, job shadowing, and part-time employment, as well as career exposure events, workshops, financial literacy, and entrepreneurship training. Coaches assist students in navigating postsecondary pathways, including college and trade school applications, scholarships, financial aid, and alignment with industry-recognized credentials.

In Program Year 2024, over 2,500 youth received direct career services, participating in more than 500 events and workshops designed to expand career exposure and employability skills. The program supported the creation of 1,800 postsecondary education plans and 500 career plans. Career coaches ensured that barrier-affected youth, including students with individualized education plans or Section

504 plans, foster youth, and first-generation college students, had equitable access to guidance and opportunities.

Thirty companies in logistics, manufacturing, automotive, government, and retail sectors participated. Employers contributed through career-exploration events, work-based learning experiences, facility tours, mentorship opportunities, and development of professional profile videos, expanding students' exposure to in-demand industries and pathways to apprenticeships, internships, and employment.

Everybody Counts integrates supports such as pre-employment transition services for students with disabilities, assistance for English Language Learners, and connections to services addressing transportation, housing and food assistance. The program emphasizes long-term engagement, including summer bridge support and smooth transitions to adult workforce programs after graduation. Success stories highlight graduates from alternative education programs and first-generation college students achieving employment, postsecondary enrollment, and career readiness.

Everybody Counts is a statewide program that connects education, career preparation, and employer engagement to help Kentucky's youth overcome barriers and succeed in the workforce.

Everybody Counts is another example of demonstrating the pillars of *America's Talent Strategy* by being a program responsive to business, education, and learner needs while integrating in the existing workforce development and educational system.

Local Veterans' Employment Representative - Military Engagement

Fort Campbell located in Hopkinsville, KY has approximately 400 to 450 soldiers exiting the military each month. One of CDO's current goals is to be more effective in offering services to the current service members, transitioning service members and their families, and assisting employers in recruiting transitioning service members. To achieve this goal, CDO onboarded a Wagner-Peyser staff at Fort Campbell Army Base housed at the Transitional Assistance Program (TAP) office on base. It was important to select the correct individual to work in this capacity to optimize the willingness of soldiers to participate and to be included in other programs and activities that Fort Campbell offers. The staff member placed on the base is a retired Army 1st Sergeant with significant experience of caring for soldiers and their families. As a veteran, he has had many of the same experiences as the soldiers transitioning from their military careers.

Offering existing soldiers, transitioning service members and their families, resources, and workforce expertise provides a pathway for gaining employment after their military career or while stationed at Fort Campbell. The Wagner Peyser staff members work with all partners within Kentucky's workforce system, especially JVSG (Jobs for Veterans State Grant) staff, to create pipelines to other areas of the state. As Fort Campbell is on the Kentucky-Tennessee border, the staff has the added benefit of working with workforce representatives from Tennessee, as well.

Having Wagner-Peyser (WP/CDO) staff serve in this capacity allows Kentucky to serve veterans and their families more effectively, as more individuals qualify for WP services than other programs. Currently, the WP staff member has been able to increase employer and jobseeker participation in

workforce services. By being readily available and a former soldier, he has gained soldiers' trust and leadership.

Coordination with Department of Corrections (DOC)

The Education and Labor Cabinet (ELC) has been working with the Department of Corrections (DOC) on several programs, including the previously mentioned Behavioral Health Conditional Dismissal Program, Putting Kentuckians First, and reentry services. These programs are targeted to the population pool they are meant to serve, and ultimately, are under the Jobs on Day One framework.

Jobs on Day One was created within the Kentucky Education and Workforce Collaborative Board (Collaborative), the government-led board designed to execute the strategy of the Kentucky Workforce Innovation Board (KWIB). The Education and Workforce Collaborative is comprised of state government Cabinet secretaries and partners within workforce development that have statewide reach. Understanding that there is a strong statewide desire to serve formerly incarcerated talent, the Education and Workforce Collaborative took the opportunity to align better and create a true system where resources can be streamlined to serve better the individuals and businesses hiring this talent pool. Through a collaborative effort of core WIOA partners and the Justice and Public Safety Cabinet, the primary cabinet overseeing the Department of Corrections, the overarching umbrella of the "Jobs on Day One" initiative was launched. The key component to this initiative is a three-phased approach: pre-release training while incarcerated, immediate job placement upon release (job on day one), and post-release retention wrap-around services to maintain retention. All partners find a role in this framework and lend their expertise.

In order to support formerly incarcerated Kentuckians in attaining good jobs, Kentucky utilizes braided funding and services between multiple state government agencies, local communities, and employers. In fact, Governor Beshear established the Governor’s Council of Second Chance Employers in 2024 to advance this goal. The council is comprised of majority business members from various sectors to promote second chance employment by working directly with government agencies to develop second chance talent.

B. The Strengths and Weaknesses of Workforce Development Activities

As mentioned in the opening summary of the 2024-2027 WIOA State Plan, Kentucky’s overall message is that we are moving forward together as a unified system under the overarching umbrella of Team Kentucky. Team Kentucky is a culmination of all stakeholders in the Commonwealth that seek to advance the state forward – this includes state government, local municipalities and county governments, business and industry, labor groups, educators, non-profit and community organizations, and individual Kentuckians.

Team Kentucky’s principles are evident in the direction in which workforce development is headed which includes as collaboration, coordination, alignment, and a team-based collective mindset. They are at the forefront of activities and initiatives within the workforce development system. The Workforce Innovation and Opportunity Act (WIOA) provides a strong foundation in which to build upon, however,

the entire workforce system consists of multiple layers of services offered by an array of organizations that meet various levels of needs by job seekers, workers, and employers. Collaboration among the entire system not only leverages WIOA funding but also enhances the service delivery model for the end-user, whether it be a job seeker, business, or staff within the system. Below are the analysis of these strengths and a reflection of the weaknesses that can be improved.

Strengths

The Commonwealth of Kentucky's workforce development north star is anchored to the Workforce Strategic Plan that outlines the key pillars for continued growth, which include:

1. Employer Engagement
2. Education Attainment
3. Workforce Participation
4. Resource Alignment

The members of the Kentucky Workforce Innovation Board (KWIB) and the workforce development system collaborated to set the overarching goals that have continued to be vital during and after the impact of the COVID pandemic on the economy and the workforce system. Moreover, the collaborative spirit of ensuring that partners in state government, community, and the business spheres are connecting, aligning, and pursuing the common north star has shown to be a great strength for the Commonwealth.

One of the key elements of strengths in recent years has been the merger of what used to be the Education and Workforce Development Cabinet and the Labor Cabinet into one entity, now called the Education and Labor Cabinet (ELC). This unified cabinet houses the four core WIOA sponsors, registered apprenticeship, and the state workforce development board within the Department of Workforce Development, along with agencies that contribute to the workforce system, including the Office of Unemployment, Department of Education, Department of Libraries and Archives, Kentucky Education Television, Kentucky Environmental Educational Council, Kentucky Commission on the Deaf and Hard of Hearing, Kentucky Commission on Proprietary Education, Kentucky Center for School Safety, Kentucky Center for Statistics, Governor's Scholars Program, Governor's School of Entrepreneurship, Department of Workplace Standards, Governor's Office of Early Childhood Education, and the Department of Workers' Claims.

Through the Cabinet merger, collaboration, and alignment to provide better services to Kentuckians have increased through a seamless service approach. Internally, staff can connect and understand cross-program impact by finding opportunities to braid services and resources and find the best ways to strive for continuous improvements.

Strengths are further depicted in the initiatives designed to foster collaboration and alignment with the aim to increase the value of services received by Kentuckians, specifically the jobseekers, employers,

and stakeholders, including workforce development staff and local communities. Some of the active initiatives that are based on a collective impact collaborative approach are listed below. These initiatives are also closely connected to the four goals of the state's strategic direction.

Furthermore, the KWIB conducted a statewide listening tour in preparation for the 2024 WIOA State Plan. From July through the end of October 2023, all ten Kentucky Local Workforce Development Areas (LWDA) contributed to the work.

The framework for the tour involved working with the local LWDA Board directors and their teams to invite workforce stakeholders to conduct a brief overview of the purpose of the WIOA State Plan and breakout into focus groups to gain insight on specific perspectives. The focus groups were broken into:

- Workforce Partners (community-based organizations, nonprofits, Memorandum of Understanding (MOU) partners, educators))
- Employers
- Elected Officials
- Individual Customers

In total, 33 focus groups were held that involved 348 participants in the listening tours with 198 workforce partners, 82 employers, 51 elected officials, and 17 individual customers contributing their perspectives.

The main line of questioning proposed to each group was a reflection on the existing workforce development system and a reimagined future state of workforce development, with the main intention of learning best practices, challenges, and opportunities that can be pursued.

Goal #1: Employer Engagement & Related Activities

Employer engagement is critical and highlights the active role businesses across the commonwealth have in supporting individuals to secure good jobs, as well as hiring, training, and developing world-class talent. The workforce development system needs tools, resources, and solutions that are simple to understand and actionable to engage businesses, and this requires the appropriate government technical assistance to support this coordination.

- Priority #1: Work-Based Learning (Business Perspective) - Expand, Scale, and Improve
- Priority #2: Expanding Talent Pools for Business Hire
- Priority #3: Unified Business Services

Federation for Advanced Manufacturing Education (FAME)

The Federation for Advanced Manufacturing Education (FAME) was founded in Kentucky by the manufacturing leadership of Toyota and its partners to create a talent pipeline to fill the critical jobs

associated with industrial maintenance. Maintenance technicians play a vital role in modern manufacturing by maintaining and ensuring the machines and robotics operate efficiently. They use complex problem-solving skills combined with technical knowledge to service and repair the machines quickly and effectively. As manufacturing continues to advance and the use of advanced manufacturing technology increases, the need for skilled maintenance technicians continues to increase.

Kentucky is a host to 12 FAME Chapters that are made up of an anchor local Kentucky Community and Technical College System (KCTCS) school that serves manufacturers in the region. FAME students attend classes at their local community college two days a week and work 24 hours a week for a local manufacturer – all while being paid a competitive wage. Upon completion, students earn an associate degree in Applied Science in Industrial Maintenance Technology-Advanced Manufacturing Technician Track, two years of work experience, and the AMT certification.

FAME has spread beyond Kentucky and is now active in 14 states across the US.

Goal #2: Education Attainment & Related Activities

Education attainment is an important component for individuals to reach their full career potential; to create an environment of growth across the entire education continuum from preschool to adult learners; to reach the statewide focus of having 60% of Kentuckians with a postsecondary credential by 2030; and to further attract global investment in the commonwealth. The development of technology has had great impact on education, the general demographic decline in population, the limited potential of growing the educator workforce due to stagnate wages, and critical need of investments in early childhood education to equip young Kentuckians with foundational skills.

- Priority #1: Work-Based Learning (Learner Perspective) - Expanding Access to Earn and Learn Opportunities
- Priority #2: Increasing the Teacher Pipeline
- Priority #3: Expanding Access & Achievement in Education for All Kentuckians

Everybody Counts

As mentioned in the previous sections, Everybody Counts is a dynamic new initiative that provides a clear pathway to success for qualifying seniors graduating from participating Kentucky school districts to begin their career, continue their education, or do both! The initiative benefits graduating seniors as well as, businesses, local communities, and Kentucky's economy. The metropolitan county region of Jefferson County Public Schools was the first pilot site which now has expanded into four (4) additional Kentucky School Districts: Shelby, Franklin, Scott, and Fayette. With this expansion, Everybody Counts increased the number of total business partners, education partners, and community organizations

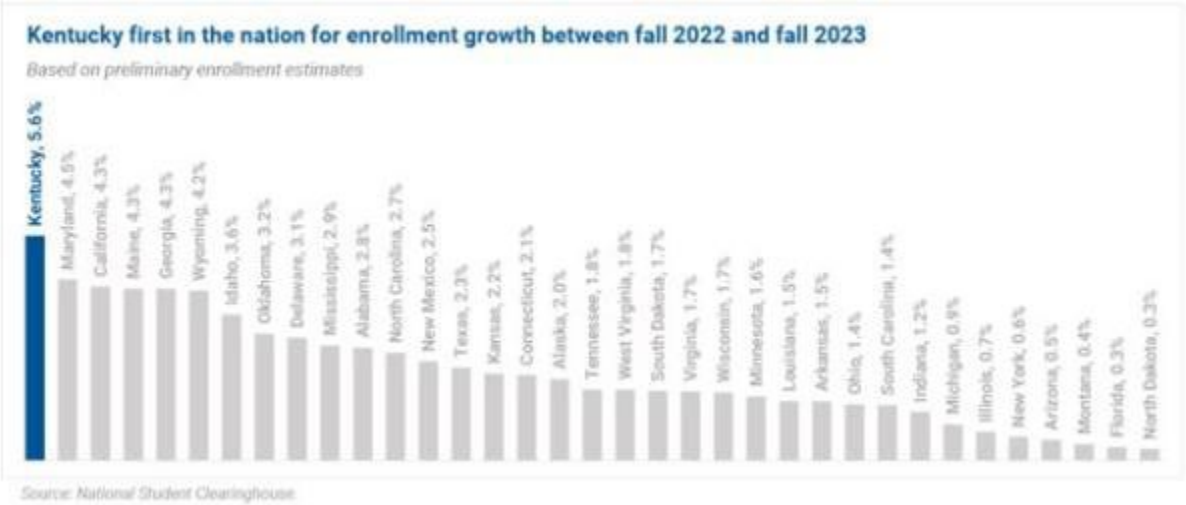
60x30 Goal

With leadership from the Council on Postsecondary Education (CPE), Kentucky's strategy for postsecondary education advances the Commonwealth's overall ambitious goal—to raise the percentage

of Kentuckians with a high-quality postsecondary degree or certificate to 60% by the year 2030. Achieving this goal is critical to accelerate job creation, grow the economy, and expand the state's tax base through the contributions of a more skilled, productive workforce.

Important in achieving this goal, a recently released data points from the National Student Clearinghouse (NSC) indicate Kentucky had the highest fall-to-fall total enrollment gains in the nation.

Between fall 2022 and fall 2023, Kentucky experienced 5.6% overall enrollment growth, including 5.5% growth in undergraduate enrollment (ranked second nationally) and 4.9% in graduate enrollment (ranked fourth nationally). Kentucky ranked first in undergraduate enrollment growth and second in graduate enrollment growth among states that are part of the Southern Regional Education Board interstate compact.



Commonwealth Education Continuum

The Commonwealth Education Continuum (CEC) exists to strengthen Kentucky's education pipeline. Its work addresses the moral imperative for students to have access and opportunity to earn degrees and credentials that lead to sustainable, competitive-wage careers.

Established in 2021, the Continuum is co-chaired by Kentucky Lt. Governor Jacqueline Coleman, Kentucky Council on Postsecondary Education (CPE) President Dr. Aaron Thompson, and Interim Kentucky Commissioner of Education Robin Kinney. It consists of members whose expertise ranges from early childhood to the workforce.

The work of the CEC is grounded in extensive stakeholder input and analysis of Kentucky's education data. The CEC workgroup members, in collaboration with the Education Strategy Group, conduct

interviews and focus groups with representative stakeholders across the state to identify needs and lived experiences.

In addition to stakeholder input, the CEC consults with an ad hoc data team collaborative including representatives from the Kentucky Center for Statistics (KYSTATS), the Kentucky Department of Education (KDE), the Kentucky Community and Technical College System (KCTCS), and the CPE. The data team provides statistics requested by or related to the priorities of the CEC and its work groups. These data provide the CEC and stakeholders with historical context, illustrate Kentucky's current reality, and inform future CEC initiatives, decision-making, and policy recommendations.

Pre-K for All

Kentucky's Pre-K for All initiative is more than an early education program – it is an investment in the commonwealth's future workforce and economy. By providing high-quality early childhood education, the program ensures children enter kindergarten ready to learn, building foundational skills in literacy, math, and social-emotional development that set the stage for lifelong academic and career success.

At the same time, Pre-K for All helps families participate more fully in the workforce. Parents, particularly mothers, can see their take-home pay increase by up to $9,000 per year while saving roughly $7,000 annually in childcare costs. These financial benefits reduce economic barriers, increase household stability, and support broader workforce participation, ultimately strengthening Kentucky's economy.

The program also invests in the early childhood education workforce, attracting, and retaining skilled educators who provide consistent, high-quality learning experiences for children while building professional pathways for Pre-K teachers and staff. By expanding access to early learning across urban and rural communities, the initiative addresses areas that do not have sufficient childcare options and supports families with the resources they need to succeed, including access to housing, transportation, and digital tools.

Community engagement is a key part of Pre-K for All. The advisory committee, established by executive order, guides program priorities and implementation, while statewide town halls give families, educators and stakeholders opportunities to provide input and learn about the initiative. Interactive projects for children and families, such as coloring activities, encourage participation and awareness, helping Kentuckians connect with early learning in meaningful ways.

Through these combined efforts, Pre-K for All strengthens children, supports families, grows the workforce, and fosters resilient communities. By improving kindergarten readiness, expanding economic opportunities, and preparing the next generation for success, the program lays a foundation for a stronger, more prosperous commonwealth.

LAUNCH Initiative

The Commonwealth of Kentucky was selected to be one of the impact states across the country for an initiative called "Launch: Equitable & Accelerated Pathways for All." This program aims to expand access to high-quality and equitable college and career pathways for all learners.

This cross-sector team is made up of collaboration with 10 state partners, including the Council on Postsecondary Education, Kentucky Department of Education, Commerce Lexington, Inc., KentuckianaWorks, Kentucky Center for Statistics, Kentucky Community and Technical College System, Kentucky Education and Labor Cabinet, Fayette County Public Schools, Jefferson County Public Schools and Shelby County Public Schools.

The commitment by this group is to ensure every Kentuckian will earn the credentials needed to be fully employed and engaged in their community, and will work towards this outcome by focusing on four key priority areas:

1. Alignment of high-quality pathways to credentials of value;
2. Seamless transitions across secondary, two- and four-year institutions;
3. Student-centered support and advising; and
4. Next-generation work-based learning experiences.

Goal #3: Workforce Participation & Related Activities

To meet the demands of the economy and businesses, workforce development must align the right person with the right knowledge, skills, abilities, and employment options. Workforce participation is a leading indicator that impacts the future Labor Force Participation Rate. Workforce participation represents the talent acquisition, development, and management processes which support the depth, skill, acumen, and flexibility of the workforce to meet the demands of emerging employment trends and priorities across the commonwealth including, but not limited to, barrier mitigation and deployment of support services to promote employment sustainability and career advancement.

- Priority #1: Addressing Barriers to Employment & Finding Solutions
- Priority #2: Employment Best Practices, a Worker Perspective
- Priority #3: Addressing Barriers to Hiring, a Business Perspective

Focus on Untapped Talent Pools

Opportunity to enter a good quality job is more possible now than ever before. Since the beginning of his administration, Gov. Beshear has announced more than 1,300 private-sector new-location and expansion projects totaling over $45 billion in announced investments, creating more than 68,000 jobs. This is the highest investment figure secured during the tenure of any governor in the commonwealth's history and $20 billion more than the next highest total.

To fill these jobs, Kentucky companies must explore wide talent pools to source and recruit. Through the Kentucky Career Center network untapped talent can be accessed.

Analyzing Benefit Cliffs

Families' benefit cliffs occur when an increase in parents' income causes them to lose access to a public benefit program, and the loss of the benefit results in a negative drop or "cliff" in net resources. These cliffs leave families with reduced financial resources even as earnings increase.

When faced with benefit cliffs, parents may elect to leave the workforce, turn down new jobs or promotions, or avoid working additional hours in order to continue to receive benefits for themselves and their families. Benefit cliffs can trap workers in employment with lower salaries and limited hours of work, preventing advancement and prosperity. For some families, these cliffs keep them in poverty, unable to move beyond low-income wages. Alternatively, if workers "power through" benefit cliffs, the resulting loss of net resources can be significant enough to return them to poverty before they can increase their earnings further.

Kentucky is focused on understanding where cliffs happen, what strategic objectives can be completed administratively, and how to maximize the opportunity for individuals on benefits to reenter the workforce while educating businesses on this issue. Such action is best taken collectively through continuous collaboration between the appropriate stakeholders including the Education and Labor Cabinet (ELC), the Cabinet for Health and Family Services (CHFS), employers, community-based organizations, and the individuals who are impacted. If reentering the workforce into a good job is the priority with minimal impact from the benefit cliffs, then the stakeholders at the table have an obligation to find solutions.

Jobs on Day One

As seen throughout this state plan, the underlying theme for the successes and continuous success of the commonwealth is the strength of collaboration and partnership. One area of innovation is with the formerly incarcerated talent pool in Kentucky, where an average of 19,200 individuals were incarcerated in Kentucky at any given time, and approximately 48,200 individuals were under some supervision, probation, or parole. . Furthermore, services to individuals with criminal records span various agencies and organizations, starting with the reentry services provided by the Justice and Public Safety Cabinet's Department of Corrections, to social services provided by the Cabinet for Health and Family Services, to employment and education provided by Education and Labor Cabinet's Office of Adult Education and Title I & III career services, and to the community- based organization that has niche programs to serve the justice involved population; notably, Goodwill Industries of Kentucky is an active and trusted partner that utilizes federal grants and philanthropic dollars to create career pathways from prison to high demand sectors.

The services provided to formerly incarcerated talent are wide in scope, but with a common outcome of quality employment. Jobs on Day One creates a statewide framework that is customizable to the local community through a three-phased approach: pre-release training and education, employment

immediately upon release (or a job on day one), and supportive services that help retain individuals through the workforce development system. This cohesion provides an avenue for all partners to collaborate in their space to ultimately strengthen employment outcomes, build talent pipelines for employers, and reduce recidivism that in due time leads to stronger communities.

The Jobs on Day One collaborative spirit has led to Kentucky Governor Andy Beshear highlighting this initiative as a critical talent strategy component that addresses employer demands with a skilled workforce.

Strategic Goal #4: Organization and Resource Alignment with Related Activities

To strengthen workforce development in the commonwealth, the system must achieve alignment, continuous collaboration, and intra-government partnerships, while also serving individuals and employers at the highest level possible. Such alignment requires common metrics to measure progress, beneficial feedback loops, and serving all customers of the workforce development system with the required flexibility.

- Priority #1: Common Return on Investment (ROI) Metrics
- Priority #2: Continuous Focus on Supply and Demand
- Priority #3: Continuous Organizational Collaboration

Education and Workforce Collaborative

One of the key platforms that allows for alignment and collaboration on critical workforce priorities is the Education and Workforce Collaborative Board (Collaborative), which was initiated through Governor's Executive Order 2020-857 (https://web.sos.ky.gov/execjournalimages/2020-MISC-2020-0551-268390.pdf) to bring education and workforce development system partners together in one group so that all available resources may be efficiently and effectively aligned and measured to enhance and improve Kentucky's workforce development system. This 19-member Collaborative is made up of executive Cabinet leadership, education leaders from K-12, community, and post-secondary level, the state chamber of commerce, federal workforce training providers such as Jobs Corps, a local workforce board director, elected officials, and the state workforce board chair.

The Collaborative is chaired by the Governor or their designee. Over the years, this body has found great synergy in addressing critical workforce components that the state workforce board, the KWIB, has brought forward through the Strategic Plan. The quarterly Collaborative meetings are divided into two meetings focused on alignment in serving specific untapped talent pools and two meetings focused on alignment of system-level workforce development priorities. The untapped pool gatherings focused on formerly incarcerated and veterans in the commonwealth; through these meetings, Jobs on Day One was launched to address the former and a veteran's taskforce was formed to address the latter. From the system priorities side, the Collaborative addressed work-based learning and provided their priorities as they relate to building the WIOA State Plan. The future of the Collaborative is going to continue

focusing on alignment, collaboration, and addressing the workforce development system through the wide lens of it being a true system of services.

Through the Education and Workforce Collaborative, the members went through selecting top data, policy, and practice priorities that can underly the overall progress in workforce development. Below are priorities that will be further analyzed over the 2024-2027 period of continued collaboration:

DATA PRIORITIES

1. Data sharing / standardization across partners (of measurements and of definitions)
2. True and consistent analyzation of data received
3. Employer data tied to individual outcomes

POLICY PRIORITIES

1. Private – Public partnership policies
2. Placement tracking and retention
3. Licensure and interstate agreements (occupational) reciprocity from other states

PRACTICE PRIORITIES

1. Track and Market Return on Investments through stakeholder communication and education (set and define expectations, stakeholders to put "skin in the game", elevate competency based-hiring)
2. Use of Technology, AI, Sector Innovation, VR Training, to support development of citizens in development and success; include high impact and vigorous updating (need more funding; effective braiding of funds; maximum collaboration)
3. Re-evaluation of services / expectations

Overall, the strength of the workforce system depends on the ability to continue to coordinate, collaborate, and strive towards mutually reinforcing activities. This includes more investment in the workforce system to complement the federal investment from WIOA to allow a stronger focus on effective initiatives in commonwealth. For example, the themes described above indicate the need to have a greater emphasis on strengthening Kentucky's untapped talent pools with the engagement of business through work-based learning opportunities – this takes further resource investment in the workforce system. Even more so when Kentucky's booming economy is performing at a high level leading to a lower unemployment rate and lower federal WIOA investment as a result. This leads to a good problem that must be addressed with a diversification of funding to meet the needs of both employers and individual customers. Investment in workforce development also provides the essential need to address full employment for all Kentuckians and to highlight the opportunity to recruit new workers to live, work, and raise a family in the Commonwealth. Investment in workforce development

also leads to the essential need to address barriers to full employment for all Kentuckians and to recruit new workers to opportunities in Kentucky to live, work, and raise a family in the Commonwealth.

Revamping Work Ready Communities

The Work Ready Communities initiative and certification program started over a decade ago in Kentucky to highlight and measure counties' readiness for economic development investment through their workforce preparation. They were designed to be an assurance to businesses and industries that a community is committed to providing the highly skilled workforce required in a competitive global economy. Through this effort, Kentucky communities assessed their workforce strengths and followed a process to become certified as Work Ready or Work Ready in Progress. The certification assessed: high school graduation rates, post-secondary credential attainment, soft skills development, internet availability, and labor force participation rate.

Work Ready Communities program has been highly engaged and has widespread brand recognition in the Commonwealth; however, the pandemic and the changes in the economic and workforce landscape have led to the need to bring Work Ready Communities into its next phase.

Emphasized by employers, soft skills continue to be the number one requested set of skills required in the workplace. The tools mentioned above with the various DWD services provide individual customer opportunities to harness critical soft skills to be considered "work ready". The importance of soft skills as the foundation to employment is important, as these skills are transferable across industries, contribute to a successful work experience, strengthen collaboration in a team or a group setting, and develop leadership and effective communication tools for continuous improvement and growth in a chosen career.

Whether in formalized training or through career services, DWD will continue to focus and build the soft skills necessary for individual customers to succeed in the workplace and be considered "work ready" across all industries.

To create the next generation of Work Ready Communities, the Kentucky Workforce Innovation Board (KWIB) took on the opportunity to understand the perspectives of various stakeholders, including economic developers (both local to Kentucky and regional to the Southeastern part of the US), local elected officials, businesses, and stakeholders in the system, such as educators and community-based organizations. Below are findings from dedicated focus groups that paved the way to a better:

- Work Ready Communities needs a revamp; the program needs to address current economic and workforce transition
- Communities need to be able to understand the supply of hard skills and soft skills
- Communities need to understand the demand for skills
- What is the capacity of high schools/community colleges to build a pipeline for in-demand skills?

- Understanding of untapped talent and service providers that support these population pools
- Utilizing regionalism as a strength, reflecting on commuting patterns
- How are communities supporting workers, specifically as it relates to transportation, housing, and childcare; these are components that bring quality of life.
- How are communities attracting talent?

Understanding these components from the community members themselves, the revamped version adopted by the KWIB building strategy into the next iteration of Work Ready Communities that includes:

Strategic Objectives

- Strategic Objective 1: Supply and Demand of Regional Skills
- Strategic Objective 2: Growth in Participation of All Workforce Talent
- Strategic Objective 3: Work-Based Learning

Talent Ready Strategies and Addressing Barriers to Employment

- Talent Ready Objective 1: Expand childcare options
- Talent Ready Objective 2: Make housing affordable
- Talent Ready Objective 3: Improve transportation options
- Talent Ready Objective 4: Build digital skills and expand broadband access
- Talent Ready Objective 5: Attract and retain talent

Collaboration on AI and Emerging Technology

KWIB spearheaded an industry-driven response to the market development of AI by forming the "KWIB AI Workforce Readiness Taskforce" co-chaired by a university professor and a business leader who is serving as the past Chair of the KWIB. This taskforce was charged to provide recommendations to the KWIB on opportunities to strengthen workforce readiness in learners, workers, and employers. The members of the taskforce included businesses from various key sectors in the commonwealth, organized labor, educators representing all components of the education continuum, government officials, nonprofit leaders, and WIOA workforce development practitioners.

Over the period of five months, the KWIB AI Workforce Readiness Taskforce conducted a Strengths, Weaknesses, Opportunities, and Threats (SWOT) analysis, hosted presentations from Kentucky technology innovators and international corporations, and discussed how to truly impact Kentuckians from the perspective of creating a workforce ready to adapt to AI innovation in the market.

The preliminary recommendations will be presented to the KWIB to ensure that the strategies impact worker mobility, learner access, and business progress, while at the same time, building an economic development strength in attracting jobs of the today and the future.

The vision the taskforce embodied was of the commonwealth as the nation's leader in emerging and innovative technologies, centering around AI as the foundational area, workforce readiness by modeling innovation, collaboration, and execution in prioritizing Kentucky businesses, all workers, and education. This vision is people-centered, so the workforce development focuses on the AI-human interaction as a valuable learning for the present and the future.

Workforce Pell

In preparation of the implementation of the Workforce Pell program, Kentucky has assembled a cross-sector group of representatives, including: ELC, DWD, Kentucky Center for Statistics, Kentucky Department of Education, Council on Postsecondary Education, Kentucky Higher Education Assistance Authority, Kentucky Community and Technical College System, CED, and KWIB business members represented by the Chair and Vice-Chair. This Workforce Pell Workgroup is tasked to:

- Review available data from KYSTATS on programs and wages
- Identify the best approach to define "high-skill, high-wage, and high-demand" credentials and occupations
- Recommend governance structure of program approval
- Ensure business and industry demand is integrated into the education system and outcomes are centered around student success and worker mobility

Alignment with Perkins V

As a result of Workforce Pell implementation, the workforce development system and the Department of Education will explore opportunities for alignment between WIOA and Perkins V, specifically as it relates to having a common definition of occupations that are high-skill, high-wage, and in-demand. This will further the WIOA-Perkins V strategic alignment in connecting students and learners to employment opportunities.

Kentucky Integrated Business Engagement System (KIBES)

The Kentucky Integrated Business Engagement System (KIBES), which operates on the Salesforce platform, provides connectivity to the business-facing workforce development staff across the Commonwealth. Through KIBES, Business Service Team (BST) members and workforce partners representing ten workforce regions can communicate and track the progress of company contacts, ongoing relationships, programs and activities utilized, and the overall status of company engagement. Having BST members on one platform makes collaboration possible as an existing company record owner could introduce their colleague to a unique program or opportunity for the business customer. Both digital and in-person collaboration among Kentucky's business services have allowed the system to be proactive in helping companies recruit, develop, and retain talent while also helping companies access labor market information, innovative workforce development practices, and resources from partners to lower costs and increase opportunities for all Kentuckians.

Dun and Bradstreet (D&B) and EconoVue

To anticipate potential layoffs and rapid response activity, the Commonwealth utilizes the Dun and Bradstreet (D&B) Market Insight System to align business needs with core partner services. This innovative, proactive approach uses real-time data and the future financial outlook of a company to identify those businesses that are in a growth pattern, in a stable state, or experiencing a potential downturn and need early intervention for layoff aversion strategies.

In PY22, an investment was made into the EconoVue platform that enhances this D&B data through an intuitive dashboard interface, allowing business-facing core program sponsors to narrow down companies based on geography, industry segment, employer risk, business growth/downturn, employer size, and view time series data of trends. With a local level understanding of D&B data, the EconoVue enhancement provides added tools to be proactive in layoff aversion strategies.

Weaknesses in the System via Barriers to Employment: Childcare, Affordable Housing, and Transportation

1. **Childcare – Access and Affordability**
    a. General support for universal pre-K programs
    b. Employee Assistance Program is a positive
        i. Implementation: employer engagement in the system is less than 50%

Stakeholder Suggestions:

- Availability for 12-hour shifts; availability on weekends
- Employer-sponsored childcare (option: sector/industrial park approach of businesses collaborating to offer childcare services)
- Support and incentives for entrepreneurism in childcare start-up

2. **Affordable Housing**
    a. Lack of new and affordable housing; multi-units are in high demand
    b. People escaping urban areas for rural communities; also leads to lack of reliable internet
    c. Innovative approaches: Elizabethtown Community and Technical College (ECTC) working with the Family Scholar House for on-campus family-style housing for students with barriers

3. **Transportation – Urban and Rural Areas**
    a. Availability and access to reliable transportation varies greatly across counties and urban and rural areas

Stakeholder Suggestions:

- Regional or rural transportation options
- Public transportation to jobs, and those seeking skills or training
- Local options for mobility incentives
- Promoting innovative solutions like Enterprise Commute

C. State Workforce Development Capacity

The Department of Workforce Development (DWD) has the capacity, experience, and partnerships to serve Kentucky job seekers and businesses in delivering employment services, education, and training. As mentioned in previous sections, DWD houses Title I-IV programs and has complementary offices that enhance services, such as for youth with the Everybody Counts initiative. Furthermore, the strength of the workforce system is within the reach of all partners that are involved. Thus, the services are exponentially multiplied when stakeholders collaborate, such as the examples provided in the explanation of the Education and Workforce Collaborative. One avenue described below shows how Title IV Vocational Rehabilitation services are administered through DWD.

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 Adult Education, vocational rehabilitation counselors assist consumers in identifying their strengths and abilities, dealing with disability-related functional limitations, learning to problem-solve, 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 helps them find employers who 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 supervisors.

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, childcare development, custodial/building maintenance, food service, grounds—keeping, industrial truck operation, and materials management. The center is intended for individuals who need intensive support 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.

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[8] and other populations.[9]

(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; formerly incarcerated; 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, 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, which may include evaluation findings, and other feedback to make continuous or quality improvements.

1. Vision

Kentucky’s workforce development vision is rooted in Kentucky’s Workforce Strategic Plan and boldly notes that the Commonwealth will –

“Create a workforce development system that is value-driven for employers, aligns education with industry demands, prepares Kentuckians for the future of work, and drives economic development.”

To make this vision a reality, Team Kentucky’s collaborative spirit described earlier is an essential component to progress. A unified, collaborative, and aligned workforce system provides comprehensive and customizable services demanded by employers and individual consumers, allowing the use of WIOA as a strong foundation and leverage to braid resources on a system level, while braiding services on the provider level.

The strategic goals described in the next section cover four main pillars for the direction of workforce development: employer engagement, education attainment, workforce participation, and resource alignment. These overarching goals have strategic objectives that provide the roadmap for the continuous improvement process. Furthermore, the emphasis in the strategy is the fact that Kentucky workforce development has two primary customers: the individual consumer and the business. The individual consumer could be someone unemployed, underemployed, or even an employed individual needs training, education, or upskilling. For business customers, the vision is to serve the existing small, medium, and large corporation, in addition to providing the workforce environment for new business to locate in the commonwealth. For the commonwealth to thrive and workforce development to advance, businesses play a significant and necessary role by engaging and signaling the evolving demands, opportunities for public-private partnerships, and overall strategic direction. The core WIOA programs, Combined State Plan partners, and partners in workforce development help achieve this vision.

2. Goals

The strategic arm of workforce development is the Kentucky Workforce Innovation Board (KWIB), a governor-appointed board made up of wide perspectives from the majority of business members, labor organizations, community-based non-profits, and government officials, including elected local and state leaders. KWIB has set four goals with accompanying strategic objectives that drives the system to meeting the vision.

Goal #1: Employer Engagement & Related Activities

Employer engagement is critical and highlights the active role businesses across the commonwealth have in supporting individuals to secure good jobs, as well as hiring, training, and developing world-class talent. The workforce development system needs tools, resources, and solutions that are simple to understand and actionable in order to engage businesses, and this requires the appropriate government technical assistance to support this coordination.

Priority #1: Work-Based Learning (Business Perspective) - Expand, Scale, and Improve

Strategic Action: Develop Business-to-Business Work-Based Learning (WBL) Guide & Best Practices (ex: five steps to starting apprenticeship; five steps to hiring WBL high schoolers; five steps to utilize government-based on-the-job training incentives; five steps to hiring WBL postsecondary learners). Key partners include business and industry associations in disseminating information and providing ongoing feedback.

Priority #2: Expanding Talent Pools for Business Hire

Strategic Action: Expanding access to all talent pools by leading with skills and widening avenues to hiring Kentuckians.

Priority #3: Unified Business Services

Strategic Action: Streamline systems, processes, and services to manage state, regional, and local relationships across the workforce and education system for better, more coordinated service delivery.

Goal #2: Education Attainment & Related Activities

Education attainment is an important component for individuals to reach their full career potential; to create an environment of growth across the entire education continuum from preschool to adult learners; to reach the statewide focus of having 60% of Kentuckians with a postsecondary credential by 2030; and to further attract global investment in the commonwealth. The development of technology has had great impact on education, the general demographic decline in population, the limited potential of growing the educator workforce due to stagnate wages, and critical need of investments in early childhood education to equip young Kentuckians with foundational skills.

Priority #1: Work-Based Learning (Learner Perspective) - Expanding Access to Earn and Learn Opportunities

Strategic Action: Create seamless opportunities and expand options for learners to engage in WBL by developing clear explanations of commonly used terms, accessing available funds, and establishing a network of WBL experts that support learners.

Priority #2: Increasing the Teacher Pipeline

Strategic Action: Establish a strong and accessible educational foundation for the next generation of educators. Growth of educators involves an understanding and awareness of current statewide and regional needs, creative and innovative strategies to attract dedicated professional into education as "next-career" opportunity and marketing all possible pathways.

Priority #3: Expanding Access & Achievement in Education for All Kentuckians

Strategic Action: Ensure all Kentuckians can achieve across the educational spectrum including credentials earned, WBL opportunities, early postsecondary opportunities (such as dual credit), and employment.

Goal #3: Workforce Participation & Related Activities

To meet the demands of the economy and businesses, workforce development must align the right person with the right knowledge, skills, abilities, and employment options. Workforce participation is a leading indicator that impacts the future Labor Force Participation Rate. Workforce participation represents the talent acquisition, development, and management processes which support the depth, skill, acumen, and flexibility of the workforce to meet the demands of emerging employment trends and priorities across the commonwealth including, but not limited to, barrier mitigation and deployment of support services to promote employment sustainability and career advancement.

Priority #1: Addressing Barriers to Employment & Finding Solutions

Strategic Action: Workforce participation is critically connected to experience of jobseekers and workers. Emphasis is placed on the individual as the "center-of-gravity" through the approach of understanding barriers for those unemployed, underemployed, and seeking employment opportunities.

Priority #2: Employment Best Practices, a Worker Perspective

Strategic Action: Leveraging information gathered in overcoming unemployment, underemployment, and career growth. Best practices will be used to grow career access and opportunities through the partnership between organizations that serve Kentuckians with barriers to employment and employers that have strategically embraced growth talent pipelines.

Priority #3: Addressing Barriers to Hiring, a Business Perspective

Strategic Action: Critical to the workforce development formula is employer willingness to hire, train, and develop all potential talent. Having a constant pulse check on employer perspective in hiring, development, training, and skills required will be conducted.

Strategic Goal #4: Organization and Resource Alignment with Related Activities

To strengthen workforce development in the commonwealth, the system must achieve alignment, continuous collaboration, and intra-government partnerships, while also serving individuals and employers at the highest level possible. Such alignment requires common metrics to measure progress, beneficial feedback loops, and serving all customers of the workforce development system with the required flexibility.

Priority #1: Common Return on Investment (ROI) Metrics

Strategic Action: Creation of common ROI metrics that are easily understood by businesses and all stakeholders is critical in reviewing snapshots, as well as long-term analyses. The common metrics include the number of participants, job placements, and average wages.

Priority #2: Continuous Focus on Supply and Demand

Strategic Action: With a special emphasis on Kentucky's top sectors, ongoing understanding of the demand of jobs and the skills employers have compared to the supply of talent produced by training and education partners.

Priority #3: Continuous Organizational Collaboration

Strategic Action: System alignment, continuous collaboration, cross-government partnerships, and public-private partnerships that leverage workforce investments through combined or braided services; allowing for unified education, training, and outreach opportunities by all stakeholders.

3. Performance Goals

WIOA TITLE I ADULT	PY 2024 GOAL	PY 2024 ACTUAL
EMPLOYMENT RATE 2ND QUARTER AFTER EXIT	76%	76.1%
EMPLOYMENT RATE 4TH QUARTER AFTER EXIT	77%	75.8%
MEDIAN EARNINGS 2ND QUARTER AFTER EXIT	$8,722	$7,500
CREDENTIALS ATTAINMENT WITHIN 4 QUARTERS AFTER EXIT	73%	78.7%
MEASURABLE SKILLS GAINS	55%	89.8%

WIOA TITLE I DISLOCATED WORKER	PY 2024 GOAL	PY 2024 ACTUAL
EMPLOYMENT RATE 2ND QUARTER AFTER EXIT	79%	86.3%
EMPLOYMENT RATE 4TH QUARTER AFTER EXIT	79%	88.9%
MEDIAN EARNINGS 2ND QUARTER AFTER EXIT	$9,951	$11,970
CREDENTIALS ATTAINMENT WITHIN 4 QUARTERS AFTER EXIT	73%	80.4%
MEASURABLE SKILLS GAINS	74.3%	91%

WIOA TITLE I YOUTH	PY 2024 GOAL	PY 2024 ACTUAL
EMPLOYMENT RATE 2ND QUARTER AFTER EXIT	70%	75.2%
EMPLOYMENT RATE 4TH QUARTER AFTER EXIT	73%	73.1%
MEDIAN EARNINGS 2ND QUARTER AFTER EXIT	$5,035	$5,921
CREDENTIALS ATTAINMENT WITHIN 4 QUARTERS AFTER EXIT	63%	72.5%
MEASURABLE SKILLS GAINS	50%	82.1%

WIOA TITLE III WAGNER-PEYSER EMPLOYMENT SERVICES	PY 2024 GOAL	PY 2024 ACTUAL
EMPLOYMENT RATE 2ND QUARTER AFTER EXIT	66%	68.6%
EMPLOYMENT RATE 4TH QUARTER AFTER EXIT	73%	66.4%
MEDIAN EARNINGS 2ND QUARTER AFTER EXIT	$6,994	$8,300

4. Assessment

Continuous improvement is a critical necessity for Kentucky to be able to assess the impact of workforce development and the progress of meeting the strategic vision and goals. Kentucky's Workforce Strategic Plan was created with the input from the 40 members of KWIB, 19 members of the Education and Workforce Collaborative, and the 10 local workforce development board business chairs. The assessment found that the following themes highlight key areas of focus to ensure the workforce development system is value-driven for employers, aligns education with industry demands, prepares Kentuckians for the future of work, and drives economic development.

- Work-Based Learning (WBL) and Training: Goal groups consistently highlighted the importance of integrating WBL with academic pathways and ensuring accessibility for all, including youth

and underrepresented populations, with a focus on expansion, improvement, and alignment across systems.

- Barriers to Workforce Participation: Persistent barriers such as lack of childcare, healthcare, transportation, and housing, as well as addiction, impact all goal areas and underscore the need for services that support all Kentuckians, particularly underrepresented populations.

- Employer Engagement and Partnerships: Goal groups emphasized that stronger collaborations between employers and workforce systems are essential to addressing hiring challenges, understanding legal and cultural nuances, and incentivizing untapped talent populations for workforce demands. Engaging employers in apprenticeship programs and skill development efforts further enhances workforce participation and partnership effectiveness.

- Use of Data: Goal groups highlighted the importance of improved use of data for predictive and proactive workforce solutions, along with further expanding data-sharing agreements with non-traditional workforce partners and ensuring the availability of timely, quality data, for informed decision-making and effective collaboration.

- Storytelling and Communication: Raising awareness of workforce services, programs, and successes among workers, employers, and policymakers, coupled with unified branding and communication strategies, is vital to aligning efforts across the goal areas.

- Untapped Talent Populations: Goal groups agreed that continuing to expand opportunities for veterans, older workers, new Kentuckians, the formerly incarcerated, and individuals with disabilities is essential for strengthening Kentucky's workforce. Scaling efforts to support untapped talent populations, address skill gaps, and remove systemic barriers can further strengthen workforce success.

- System Alignment and Collaboration: While Kentucky has made great progress on system alignment, goal groups agreed that silos still persist and efforts must be made to move toward consistent coordination as a system of partners and cross-sector work. Strategies to align community and state resources toward shared goals are critical for fostering collaboration and achieving greater impact.

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)

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)

As described in previous sections, the Kentucky Workforce Innovation Board (KWIB) sets the strategic vision and has done so through the four goals as the pillars of strategy: employer engagement, education attainment, workforce participation, and resource alignment. The Education and Workforce Collaborative takes the strategies and implements them into the greater workforce development system through alignment and partnership. Department of Workforce Development (DWD), housing Title I-IV programs, provides the actionable steps in serving the customers of WIOA programming with an emphasis on in-demand sectors, sector partnerships, and equitable career pathways to assist individuals in reaching their potential.

One proven strategy for creating career pathways into in-demand industries is through Registered Apprenticeship Programs (sometimes referred to as RAPs). Apprenticeships are a win-win for individuals and employers as they open pathways to high-paying careers and help employers attract and retain skilled workers in hard-to-fill jobs. Choices range from traditional skilled trades and construction pathways to opportunities in healthcare, business, technology, educational services, advanced manufacturing, and many others.

Registered Apprenticeships opportunities span more than 1,500 fields, from healthcare and manufacturing to emerging roles like whiskey specialist, teacher and library technician.

In Program Year 2024, Kentucky added 2,456 new apprentices, bringing the statewide total to over 5,500 active participants. Apprentices progress through wage increases and milestone achievements, earning industry-recognized credentials while gaining practical experience. Incumbent Worker Training

complements this model by helping employees maintain certifications, upskill and advance in their careers, strengthening both business operations and retention.

Targeted initiatives address critical workforce needs. The Early Childhood Education Apprenticeship supported 125 apprentices across 41 employers in Program Year 2024, part of an effort that has served more than 300 participants statewide. These programs expand credential attainment while helping address childcare workforce shortages. Likewise, the Grow Your Own Registered Teacher Apprenticeship, promoted through Kentucky Department of Education's GoTeachKY, helps districts build teacher pipelines by pairing classroom experience with mentorship and academic training.

Through these efforts, Kentucky continues to expand registered apprenticeships, foster employer–education partnerships, and develop a skilled, adaptable workforce.

Central to this work is the Office of Industry and Apprenticeship Services leads Kentucky's Registered Apprenticeship program and a range of employer support initiatives that help businesses recruit, train, and retain talent while providing Kentuckians with meaningful career pathways.

OIAS, as a partner agency with Title I-IV programs, JVSG, TAA, and UI, which are all housed within DWD, provides an increased opportunity for collaboration and alignment among the programs providing services to individuals and employers. Organizational structure plays a pivotal role in assuring fluid connections to work-based learning opportunities such as Registered Apprenticeship.

Central to this effort is the Workforce Talent Project Management Team operating within the Office of Industry and Apprenticeship Services. Acting as an "easy button" for employers, the team connects businesses with the right people, programs, and partnerships to deliver tailored workforce solutions. Services include recruitment support, work-based learning and training programs, guidance on financial incentives, and rapid response assistance during workforce transitions.

The strategy strengthens the work of programs and initiatives of the Office of Vocational Rehabilitation (OVR). Career pathways are of particular importance in assuring the delivery of services to individuals facing significant barriers to employment. Individuals with disabilities seeking to enter the workforce can face additional or compounding barriers to their disability, such as outdated skill sets, being a single parent, lacking financial resources, having minimal or no previous work experience, and not completing secondary education. Using a career pathways model is a "best practice" for providing vocational rehabilitation services. It is further strengthened by Title IV of WIOA, which goes beyond solely placing an individual in an entry-level job and promotes assisting an individual to "advance in" a career. OVR provides opportunities to program participants to obtain industry-recognized credentials in multiple career pathways at the Carl D. Perkins Center. Work experiences, internships, and other employer-facing experiences are provided at the Perkins Center, the McDowell Center for the Blind, and throughout the state through OVR's community rehabilitation providers and Supported Employment programs. OVR provides individualized vocational counseling to prepare individuals with disabilities for employment through using labor market information and understanding the variety of post-secondary training options suited to their interests and abilities.

As a result of Rehabilitation Services Administration federal grant funding, OVR was able to create and host a Career Pathways Toolkit on its website. This toolkit is a resource for OVR staff development in providing services through a Career Pathways lens. https://kcc.ky.gov/Vocational-Rehabilitation/seeking-services/projectcase/Pages/default.aspx.

Furthermore, as part of the Quality Jobs, Equity, Strategy and Training (QUEST) grant Kentucky received, DWD is also preparing to roll out the Ready for Industry platform, which is a resource that includes five self-paced courses that create a bridge between standard education and the knowledge needed to succeed in the following industries: healthcare, manufacturing, construction, information technology, and logistics. For each of the industries, Ready for Industry provides self-paced online instructions on:

- Introduction to the industry
- What it is like to work in the industry
- Industry terminology and common practices
- Workplace expectations in industry
- Career opportunities and descriptions
- Current issues and trends in the industry
- Career pathways, education, and certification in the industry

Given DWD's organizational structure, all core partners, Combined State Plan partners, and the greater workforce system partners will be able to access Ready for Industry, which will provide greater opportunities for workforce system customers to learn about these career pathways. This resource will be a useful tool for individuals with disabilities served under Project CASE, individuals exploring apprenticeships and those in the industry, and all other individuals going through various career pathways programming or exploring opportunities in new careers.

All core programs and Combined State Plan partners align for fully integrated customer service through various mechanisms, including platforms with an emphasis on collaboration and alignment of services for the benefit of the customers.

Education and Workforce Collaborative

One of the key platforms that allow for alignment and collaboration on critical workforce priorities is the Education and Workforce Collaborative Board, which was initiated through a Governor's Executive Order to bring education and workforce development system partners together in one group so that all available resources may be efficiently and effectively aligned and measured to enhance and improve Kentucky's workforce development system. This 19-member Collaborative is made up of executive Cabinet leadership, education leaders from K-12, community and post-secondary level, the state

chamber of commerce, federal workforce training providers such as Jobs Corps, a local workforce board director, elected officials, and the state workforce board chair.

Over years, this body has found great synergy in addressing critical workforce components that the state workforce board, the KWIB, has brought forward through the Strategic Plan. The quarterly Collaborative meetings are divided into two meetings focused on alignment in serving specific untapped talent pools and two meetings focused on alignment of system-level workforce development priorities. In 2023, the untapped pool gatherings focused on formerly incarcerated and veterans in the commonwealth; through these meetings, Jobs on Day One was launched to address the former, and a veteran's task force was formed to address the latter. From the system priorities side, the Collaborative addressed work-based learning and provided their priorities as they relate to building the WIOA State Plan. The future of the Collaborative is going to continue focusing on alignment, collaboration, and addressing the workforce development system through the wide lens of it being a true system of services that encompasses core programs, Combined State Plan partners, and many other state programs that can be leveraged for a fully integrated customer service experience.

Through representation on the SWATT and the Education and Workforce Collaborative, the state workforce development board, the Kentucky Workforce Innovation Board (KWIB), plays an important strategic role in the statewide alignment of career pathways, specifically in identifying in-demand industries. Understanding Kentucky's most in-demand industries is the foundation that career pathways can build on to ensure long-term customer success across the workforce system.

The identification of in-demand industries impacts not only core programs and combined State Plan partners but also the greater workforce system in Kentucky. The impact within the core programs touches the investment of time and resources in providing on-the-job training, incumbent workers training, work experience/internships, and individual training account use through the Eligible Training Provider List (ETPL). Furthermore, workforce system partners such as the Kentucky Higher Education Assistance Authority's (KHEAA) administration of the Work Ready Scholarship hinges on providing scholarships to Kentucky residents to earn a certification at no cost in the top five sectors in Kentucky. Similarly, the Cabinet for Economic Development's Bluegrass State Skills Corp. (BSSC) is a training investment program that provides qualified companies grants and tax incentives to train their workforce; this investment tool is also informed by the top identified sectors.

Due to the importance of building career pathways into in-demand sectors, the KWIB initiated a diverse work group comprised of business, government, education, nonprofit, and labor leaders to review the current labor market information to identify and recommend key sectors. The workgroup collectively agreed to focus on individual occupations with noteworthy metrics that include occupational demand, occupational growth rate, and family-sustaining entry annual wages. These metrics provide a list of good jobs that have various career pathways, and these occupations were cross-walked into sectors, leading to a list of recommended sectors with career pathways as the foundation. The work continued with the quantitative analysis provided by the workgroup, which received a qualitative review from the statewide leaders in the education and training space.

Kentucky's Top Five In-Demand Sectors:

1. Healthcare
2. Manufacturing and Logistics
3. Construction
4. Education
5. Professional, Scientific, and Technical Services (PS&TS)

Background

The process of identifying the top five in-demand sectors in Kentucky took place through a two-phase approach, through a quantitative and qualitative review process. The data gathering and analysis was provided by the Kentucky Center for Statistics.

The quantitative review process initiated in the Sector Strategies Workgroup with membership consisting of KWIB members, business and industry representatives, education partners, government representatives and workforce development practitioners. The workgroup settled on the key quantitative data approach of reviewing occupations that are in-demand, experiencing growth, and have living wages. Specifically, the formula set by the quantitative group:

- Entry Annual Wages OR Median Wages (25%)
- Occupational Demand (50%)
- Growth Rate (25%)

Importantly, the business members of the workgroup emphasized the importance of occupational demand and giving it more percentage weight above the other elements. The list of key occupations was then connected to their respective industry sectors. The quantitative workgroup reviewed various ranking methods in the review process (i.e. incorporating location quotient) and ultimately settled on the fact that all methods lead to similar sector output.

Once the quantitative workgroup agreed on the formula and the data derived, the work of the qualitative workgroup began. The qualitative workgroup consisted of statewide education and training organizations that not only administer various training dollars but also understand industries that may be experiencing growth in the future not yet reflected in data.

Example Occupations

1. Healthcare
    - Registered Nurse
    - Medical and Health Services Managers

- Nurse Practitioner
- Substance Abuse, Behavioral Disorder and Mental Health Counselors
- Clinical Laboratory Techs

2. Manufacturing and Logistics
    - Assemblers and Fabricators
    - Inspectors, Testers, Sorters, Samplers and Weighers
    - Machinist
    - Industrial Production Managers
    - Heavy and Tractor-Trailer Truck Drivers
3. Construction
    - Construction Laborers
    - Carpenters
    - Electricians
    - Plumbers, Pipefitters and Steamfitters
    - Project Management Specialists
4. Education
    - Elementary School Teachers
    - Secondary School Teachers
    - Middle School Teachers
    - Educational, Guidance and Career Counselors and Advisors
    - Postsecondary Teachers
5. Professional, Scientific and Technical Services (PS&TS)
    - Software Developers
    - Management Analysts
    - Paralegals and Legal Assistants
    - Computer User Support Specialists
    - Market Research Analysts and Marketing Specialists

Impact and Future Review

Identifying these sectors allows Kentucky to focus time and investment into growing the opportunities in industries and occupations that are in high demand, are experiencing growth and pay living wages.

Investment in these sectors and occupations go beyond WIOA as the Kentucky workforce development system operates in a collaborative and strategic direction.

The five in-demand sectors provide a statewide lens, while local workforce development boards can incorporate an additional two sectors that are reflective of their local economies.

In addition to adopting the top five in-demand sectors, the KWIB voted to incorporate a review process every five years utilizing the two-phase approach of quantitative and qualitative review.

The key sectors also provide the foundation to defining "high-skill, high-wage, and in-demand" occupations as required by Workforce Pell and in alignment with WIOA and Perkins V.

Certain sector partnerships described earlier in the strengths section are highlighted again below as they relate to creating career pathways in in-demand industries:

The Federation for Advanced Manufacturing Education (FAME) was founded in Kentucky by the manufacturing leadership of Toyota and its partners to create a talent pipeline to fill the critical jobs associated with industrial maintenance. Maintenance technicians play a vital role in modern manufacturing by maintaining and ensuring the machines and robotics operate efficiently. They use complex problem-solving skills combined with technical knowledge to service and repair the machines quickly and effectively. As manufacturing continues to advance and the use of advanced manufacturing technology increases, the need for skilled maintenance technicians continues to increase.

Kentucky is a host to 12 FAME Chapters that are made up of an anchor local Kentucky Community and Technical College System (KCTCS) school that serves manufacturers in the region. FAME students attend classes at their local community college two days a week and work 24 hours a week for a local manufacturer – all while being paid a competitive wage. Upon completion, students earn an associate degree in Applied Science in Industrial Maintenance Technology-Advanced Manufacturing Technician Track, two years of work experience, and the AMT certification.

FAME has spread beyond Kentucky and is now active in 14 states across the US.

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 Department of Workforce Development has identified opportunities to align core workforce programs through several different improvements in the system.

The first opportunity is to update the One-Stop Certification process to ensure that customers of WIOA can locate the services that are consistent across each of the career center locations. Currently, the One-Stop Certification process involves recognizing Kentucky Career Centers (KCC) across a three-tier

approach: a Comprehensive Career Center, an Affiliate Career Center, and a KCC Access Point. The requirements are as follows:

- Each Local Workforce Development Area (LWDA) must have at least one Comprehensive Career Center with Title I staff present and access to each partner program that provides the required career services, training services and business services.
- Affiliate Career Centers are designed to make the programs, services, and activities from one or more KCC partners, but not all partners, available to job seekers and employers. The Affiliate Career Center can be a Specialized Career Center that addresses the specific needs of certain groups of job seekers and /or employers, like those of dislocated workers, youth or of key industry sectors or clusters. Affiliate Career Centers may also be used for a network of affiliates or a network of partners with linked access to affiliates.
- KCC Access Points can be mobile or permanent locations with one designated point of contact. A KCC Access Point will, at a minimum, have qualified individual(s) cross-educated in all six Workforce Innovation and Opportunity Act (WIOA) core programs and will refer job seekers and employers to partner staff at Comprehensive and/or Affiliate KCCs.

Since the inception of these guidelines, the Department of Workforce Development has grown to encompass all the core WIOA programs, and an environmental scan proved that some core program partners that offer services to job-seekers, workers, and employers at physical locations are not encompassed in the three-tier One-Stop system. The updated One-Stop Certification process would expand to ensure consistency, availability, and accessibility for consumers to reach workforce services is deployed. Furthermore, the hybrid service delivery model will be explored in greater detail during the update to the One-Stop Certification process.

The second opportunity is to align the core programs to integrate customer services consistent with the vision and goals fully to evaluate the performance of service delivery, customer satisfaction of the various programs, and continuous improvement. One way to do this is to explore high-performing Workforce Innovation Boards (WIB) initiatives that would focus on board efficiency, effectiveness, and continuous improvement across the Commonwealth's ten local WIBs, with the purpose of encouraging local WIBs to act strategically, think beyond the scope of WIOA.

The third opportunity, and one that addresses some of the weaknesses mentioned in the previous section on lack of childcare, transportation, and affordable housing, is fully embracing the regional approach to Work Ready Communities. The goal of the Work Ready Communities-Next Generation model is to allow the local and regional community leaders to strategically think about addressing these barriers to employment. The stakeholders would involve core program partners as the services offered through WIOA and the workforce system provide complementary solutions to these highly regional barriers to employment.

The final opportunity to address one of the weaknesses mentioned earlier is to implement a workforce academy model that would provide training and continuous improvement to the workforce development statewide staff to ensure ongoing professional development that would ultimately result in better service delivery to the jobseekers, workers, and employers engaging with the workforce development system.

Furthermore, all core programs and Combined State Plan partners align for fully integrated customer service through various mechanisms, including platforms that emphasize collaboration and service alignment for the benefit of customers.

Education and Workforce Collaborative

One of the key platforms that allow for alignment and collaboration on critical workforce priorities is the Education and Workforce Collaborative Board, which was initiated through a Governor's Executive Order to bring education and workforce development system partners together in one group so that all available resources may be efficiently and effectively aligned and measured to enhance and improve Kentucky's workforce development system. This 19-member Collaborative is made up of executive Cabinet leadership, education leaders from K-12, community and post-secondary level, the state chamber of commerce, federal workforce training providers such as Jobs Corps, a local workforce board director, elected officials, and the state workforce board chair.

The Collaborative is chaired by the Governor or their designee, who is currently the Deputy Secretary of the Education and Labor Cabinet and the Acting Commissioner of the Department of Workforce Development (DWD); all core programs and Combined State Plan partners are under the DWD and ELC organizational umbrella.

Over the years., this body has found great synergy in addressing critical workforce components that the state workforce board, the KWIB, has brought forward through the Strategic Plan. The quarterly Collaborative meetings are divided into two meetings focused on alignment in serving specific untapped talent pools and two meetings focused on alignment of system-level workforce development priorities. The untapped pool gatherings focused on formerly incarcerated and veterans in the commonwealth; through these meetings, Jobs on Day One was launched to address the former, and a veteran's task force was formed to address the latter. From the system priorities side, the Collaborative addressed work-based learning and provided their priorities as they relate to building the WIOA State Plan. The future of the Collaborative is going to continue focusing on alignment, collaboration, and addressing the workforce development system through the wide lens of it being a true system of services that encompasses core programs, Combined State Plan partners, and many other state programs that can be leveraged for a fully integrated customer service experience.

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).

Kentucky's state workforce board is the Kentucky Workforce Innovation Board (KWIB), which carries out the state board functions outlined in section 101(d) of WIOA to operationalize those functions, carry out the vision of the board, and serve as an entity to the Governor on all workforce matters.

The operational structure of the board consists of decision-making by the full board on recommendations provided through the committee structure of the KWIB. Four standing committees that are directly linked to the four goals of the Strategic Plan: employer engagement, education attainment, workforce participation, and resource alignment. The Chairs of each of the committees are KWIB members and are also represented on the Executive Committee. The Executive Committee structure mirrors the diverse and collaborative voices of the KWIB, with the majority of business members having complementary representation from organized labor. The 7-member Executive Committee is led by the KWIB Chair (business), Vice Chair (business), four Chairs from the standing committees, and a labor representative, with the past KWIB Chair serving as an honorary mentor without voting rights. The Executive Committee is entrusted with the first line of review on strategic policies, recommendations from steering committees, and other activities that will be lifted to the full KWIB. The Executive Committee also meets one month before the quarterly KWIB meetings to ensure any decisions that need to be brought before the full board are discussed and lifted properly. During these meetings, the Executive Committee can engage with leaders from ELC to continuously align strategy (KWIB) and execution (DWD). Nonetheless, the ultimate decision making is left to the full KWIB membership through the voting process of items lifted through the committee structure. This process provides multiple layers of review by a diverse group of dedicated governor-appointed members.

Further, under the four standing committees are various workgroups that function to complete specific tasks directed by their respective committees. These work groups are made up of stakeholders representing KWIB members, non-member employers, workforce development staff, community-based organizations, and others who have specific interest in the topic at hand. Functionally, these work groups can also serve as critical avenues that keep the vision of the board in its activities. For example, the CTE Certification Continuous Improvement Workgroup is entrusted with being the first body to review the various CTE certification requests that come to the state. The business and education members of the workgroup can provide their feedback on the validity of a given certification request and thus live out the strategic objective of employer-demanded training and certification under the Education Attainment goal. Below is the process for CTE certification.

The structure of the board as depicted in the Landscape graphic provides strategic direction to the Education and Workforce Collaborative and the action side of core WIOA programs through the Department of Workforce Development, described in the following section. As can also be seen from the graphic, the 10 Local Workforce Development Boards (LWDB) are actively engaged across multiple state workforce board functions to ensure local and regional voices, best practices, and challenges are engrained in the strategy.

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.

As mentioned previously, the strategies set by the Strategic Plan are implemented by the workforce development system through the collaborative efforts at the Education and Workforce Collaborative and carried out by the Department of Workforce Development that houses Title I-IV programs and the Combined Plan partners.

Each of the core programs and Combined State Plan partners have a responsibility and the appropriate WIOA funding stream in carrying out the four strategic goals. For example, employer engagement is a

key component to connecting dislocated workers, adult customers, and youth to the workforce; employers not only provide job opportunities but also provide trainings through formalized registered apprenticeships or on-the-job trainings. In executing education attainment goals, the Kentucky Adult Education (KYAE) system provides literacy and employability education that ultimately leads to employer or better employment; similarly, programs like TAA have traditionally been used for the education attainment of skills to competitively reenter the workforce. Workforce participation is a strategic goal that all programs strive towards, as individuals classified as untapped talent are served across the board; one specific example is the veteran talent pool served by JVSG. Finally, to maximize and leverage funding across the system, all programs are continuously finding state-level and local partnerships to align resources for the greatest impact.

Part of striving towards achieving strategic goals and objectives, and as part of the alignment of state strategic goals and local understanding and implementation of the most critical factors impacting local communities, listening sessions for the 2024-2027 WIOA State Plan were conducted (described in the strengths section) with the below strategies that aligned to the four pillars and commonly shared throughout the commonwealth. The themes that arose are not novel to the workforce development system nor are they currently implemented, but instead, the emphasis on the importance was highlighted to be lifted for continuous improvement, innovation, and execution.

1. Youth Employment – the Future of Workforce

- The most cited point and critically important point of continuous "exposure to careers" and opportunities for work-based learning
    - Exposure to careers to start during middle school
    - Career exploration to further develop in high schools
- A key point of career exposure was also to involve parents and teachers in understanding all options available in the world of work
    - The cultural shift of ensuring careers in manufacturing and trades are valued; these roles are becoming technologically advanced
    - Understanding that "good jobs" are available in all sectors
- Ensuring that the workforce system reaches youth before they become "opportunity youth"
    - Understanding many kids are raised by grandparents and many have parents incarcerated, a different approach is necessary to begin barrier removal
    - Finding opportunities to partner with the Office of Vocational Rehabilitation (OVR) to help youth with disabilities; growing partnership with VR's Pre-Employment Transition Services (Pre-ETS) program
- Lack of mentors and mentorship programs leads to disengaged youth

- The value of essential skills and work ethic is critical

Stakeholder Suggestions:

- Exposure to teachers on all local career (specifically manufacturing and trades) options via externships or short-term bootcamps
- Utilization of "-ships" as a youth career exposure recruitment tool, specifically internships and apprenticeships
- Showcasing diverse workers to students to ensure ALL kids see themselves in various occupations
- Providing students with Labor Market Information (LMI) on all job opportunities and associated wages
- Deeper collaboration between employers, workforce system, higher education, and district superintendents
- School-based career advisors as direct in-school connectors to work
- "Student workforce spotlights" to showcase successful work-based learning and/or working in a particular industry

2. Hiring and Supporting Non-Traditional Talent / Workers (Untapped Talent)

- The most cited talent group was formerly incarcerated as several statewide and locally run programs are actively engaged in employment services; opportunities to further efforts through:
    - More expungements fairs as awareness of expungement grows
    - Pre-apprenticeship programs to link individuals while incarcerated to outside registered apprenticeship programs upon release
    - More reentry simulations to exposure employers and workforce practitioners to barriers faced
    - Supportive services as scaffolding to build resilience
- Kentucky has a high number of individuals with disabilities with many employment programs that can be braided and leveraged
- Veterans/Military
    - Ft. Campbell averages ~500 transitioning soldiers monthly; Ft. Knox averages ~50 transitioning soldiers monthly; these numbers are further increased when adding spouses and families

    - Transfer of military experience to civilian life is an important component in entering the workforce
- The aging population provides the benefits of higher retention

Stakeholder Suggestions for all Untapped Talent:

- Building pipelines into the workforce (focus on sectors)
- Educating employers on the benefits/ROI and potential challenges with workforce system solutions
- Creating a support structure for employers and workers; example: council/committee for businesses that hire a specific talent pool
- Creating a welcoming community
- Use of technology where career exposure is a barrier (ex: using VR goggles)
- Employer understanding of the benefits cliff and associated challenges
- Digital access and literacy are not equally distributed; provide more avenues for digital training
- Establish councils/focus groups of individuals representing a specific untapped talent pool for the continuous customer-centered understanding of challenges and opportunities (including youth talent)
- Utilizing Employer Resource Networks (ERNs) to provide career and barrier removal coaching is less costly than high turnover

3. Business Engagement & Industry Innovation

- Importance of businesses being an engaged partner; being an active voice at the table
- The workforce system must emphasize support for small and medium-sized companies
- Employer investment in work-based learning/on-the-job training is critical
- Employer time is limited; using webinars, blogs, and direct communication to share resources
- Businesses are interested in actively engaging with other businesses, starting organic sector partnerships, opportunities to collaborate on sector training, employee support systems (sector-operated childcare center)
- Support to county and municipal government as an employer as competition has created hard-to-fill local government jobs: emergency response, road department, sewer and water, etc.
- Businesses are facing succession planning as retirements grow; looking at apprenticeship as a knowledge-sharing program is building momentum

- Supporting the recovery population in an ongoing basis through resources (or peer support specialists)

Stakeholder Suggestions:

- Flexibility of support for employees (ex: using tuition reimbursement dollars for short-term training, upskilling, childcare assistance, or car repair funds)
- Looking at skills versus degrees; providing skills training through work-based learning
    - Similarly, offering Adult Education courses to individuals with high school degrees (ex: East Kentucky employer recognized that 60,000 in EKY/Bordering WV lack a GED; changed policies to hiring entry-level and train)
- Kentucky Career Center's proactive engagement with small businesses
- As a tool for better recruitment and retention, it provides good jobs that provide competitive wages, benefits, career advancement, voice, occupational safety, recruitment of untapped talent pools, and a positive organizational culture

Enhanced Collaboration within Workforce and with Education

- Enhanced flexibility and partnership between education and workforce; lines need to be blurred
- Communication among workforce partners to raise awareness of available programs for businesses
- Continuous education to combat the perception of the Kentucky Career Center as the "unemployment office"
- Educational continuum needs to be embraced, "K through Gray" or "Cradle to Grave" as individuals become lifelong learners
- Reduced WIOA funding impact on local area providers; collaboration and braiding of funding and services is a necessity; collaboration also balances out duplication of services
- Addressing mental health impacts on over-burdened service providers
- Co-location of multiple partners in one physical space provides best services; while at the same time, rethinking brick and mortar locations; meeting customers where they are
- Ongoing staff training and exposure to the greater Kentucky workforce system

Stakeholder Suggestions:

- Creating a shared north star to collective pursue (ex: connection to good jobs for customers; finding qualified talent to businesses; jointly removing barriers); KWIB's strategic plan and four pillars provide an avenue for system alignment

- Avoiding “silos of excellence” and creating a “system of excellence”
- Regional promotion of services to provide support to rural area
- Collaboration on training space at an Area Technology Center (ATC) designed to serve youth during the day, with an opportunity to serve adults at night
- Exploration of how discretionary funding to support local innovation can involve local match
- Collaboration opportunities include:
    - Understanding the leads/champions of specific initiatives or programs
    - Internal resource fairs for partners
    - A unified labor exchange system
    - Unified communication/outreach strategy
    - Shared online portal with all program resources available for staff training and business interest

Funding to meet necessary activities can be directed as appropriate to the respective agencies with DWD, while agencies outside of ELC can be engaged to provide supportive or braided funding to accomplish a given activity. Further, the allocation set aside by WIOA for the Governor’s discretionary fund, known as the Kentucky Statewide Reserve Fund, is divided into three primary categories of investment:

- Local innovation: allocated to innovative workforce development projects on the local or regional level
- Local implementation of the Governor’s priorities
- State investment in the Governor’s priorities (including on-going state transformational projects)

B. ALIGNMENT WITH ACTIVITIES OUTSIDE THE PLAN

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

The unifying message of collaboration, alignment, and partnership boils to the spirit of Team Kentucky working together. One avenue described earlier is through the Education and Workforce Collaborative; initiated through a Governor’s Executive Order to bring education and workforce development system

partners together in one group so that all available resources may be efficiently and effectively aligned and measured to enhance and improve Kentucky's workforce development system. This 19-member Collaborative is made up of executive Cabinet leadership, education leaders from K-12, community, and post-secondary level, the state chamber of commerce, federal workforce training providers such as Jobs Corps, a local workforce board director, elected officials, and the state workforce board chair.

Further, alignment and coordination happen across various workforce development initiatives that span cabinets and agencies, below are a few highlighted:

Education Initiatives (Corresponding to Strategic Goal #2 of Education Attainment):

Everybody Counts is a dynamic new initiative that provides a clear pathway to success for qualifying seniors graduating from participating Kentucky school districts to begin their career, continue their education, or do both! The initiative benefits graduating seniors as well as businesses, local communities, and Kentucky's economy.

Kentucky Department of Education's TRACK Program: The Tech Ready Apprentices for Careers in Kentucky (TRACK) youth apprenticeship program is a partnership between the Kentucky Department of Education's Office of Career and Technical Education and the Kentucky Office of Industry and Apprenticeship Services (OIAS) to provide secondary students with career pathway opportunities into Registered Apprenticeship programs.

TRACK is a business and industry-driven program designed to create a pipeline for students to enter post-secondary apprenticeship training. Students receive a nationally recognized credential at little or no cost.

Employers tailor the program to their specific needs and select the Career and Technical Education (CTE) courses for the apprenticeship pathway to create a competitive recruiting environment for future employees grounded in strong technical and professional skills.

LAUNCH Initiative: Understanding the importance of education attainment to Kentucky's future, this program aims to expand access to high-quality and equitable college and career pathways for all learners. The four focus areas are:

- Alignment of high-quality pathways to credentials of value;
- Seamless transitions across secondary, two- and four-year institutions;
- Student-centered supports and advising; and
- Next-generation work-based learning experiences.

Commonwealth Education Continuum (CEC): CEC exists to strengthen Kentucky's education pipeline. Its work addresses the moral imperative for students to have access and opportunity to earn degrees and credentials that lead to sustainable, competitive-wage careers.

Established in 2021, the Continuum is co-chaired by Kentucky Lt. Governor Jacqueline Coleman, Kentucky Council on Postsecondary Education (CPE) President Dr. Aaron Thompson, and Interim Kentucky Commissioner of Education Robin Kinney. It consists of members whose expertise ranges from early childhood to the workforce.

The work of the CEC is grounded in extensive stakeholder input and analysis of Kentucky's education data. The CEC workgroup members, in collaboration with the Education Strategy Group, conduct interviews and focus groups with representative stakeholders across the state to identify needs and lived experiences.

KCTCS Education First Employers: This program is meant to highlight and form partnership between KCTCS colleges and employers across the Commonwealth who offer tuition benefits and flexible scheduling with the understanding that their employees are also pursuing higher education. The idea is for students not to have to choose between working or learning but to accomplish both simultaneously. This network of Education First Employer companies offers benefits to students, helping them to complete their educational credentials and flourish in the workplace. Benefits to students include:

- Tuition benefits
- Flexible schedule
- Access to jobs with competitive wages
- Connection to a network of companies
- Inclusive work environment
- Mentorship and career development preparation
- Assistance with transportation, housing, or other needs
- Jobs aligned with a chosen program of study

Pre-K for All

Kentucky's Pre-K for All initiative is more than an early education program – it is an investment in the commonwealth's future workforce and economy. By providing high-quality early childhood education, the program ensures children enter kindergarten ready to learn, building foundational skills in literacy, math, and social-emotional development that set the stage for lifelong academic and career success.

At the same time, Pre-K for All helps families participate more fully in the workforce. Parents, particularly mothers, can see their take-home pay increase by up to $9,000 per year while saving roughly $7,000 annually in childcare costs. These financial benefits reduce economic barriers, increase household stability, and support broader workforce participation, ultimately strengthening Kentucky's economy.

The program also invests in the early childhood education workforce, attracting, and retaining skilled educators who provide consistent, high-quality learning experiences for children while building professional pathways for Pre-K teachers and staff. By expanding access to early learning across urban and rural communities, the initiative addresses areas that do not have sufficient childcare options and supports families with the resources they need to succeed, including access to housing, transportation, and digital tools.

Community engagement is a key part of Pre-K for All. The advisory committee, established by executive order, guides program priorities and implementation, while statewide town halls give families, educators and stakeholders opportunities to provide input and learn about the initiative. Interactive projects for children and families, such as coloring activities, encourage participation and awareness, helping Kentuckians connect with early learning in meaningful ways.

Through these combined efforts, Pre-K for All strengthens children, supports families, grows the workforce, and fosters resilient communities. By improving kindergarten readiness, expanding economic opportunities, and preparing the next generation for success, the program lays a foundation for a stronger, more prosperous commonwealth.

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 Department of Workforce Development (DWD) is strategically positioned through its organizational structure to encompass all core programs, Combined State Plan partners, and critical workforce system partners (such as registered apprenticeships). Given the department structure, DWD holds biweekly meetings among the core programs and Combined State Plan partners to allow for continuous alignment of services and improvement in the delivery model. This effort has led to several improvements that allow for the coordination of activities and the delivery of supportive services to individuals with barriers, disabilities and individuals living in rural and remote parts of Kentucky.

An example of improving service delivery is coordinating the performance strategy among the core programs and Combined State Plan partners. By examining the five performance measures described below, DWD can align, coordinate, and leverage resources in each of the core programs to achieve not only positive and progressive performance measures but also deliver unified, high-quality service to the customer.

- Employment Rate - 2nd Quarter After Exit: this indicator represents the percentage of participants who are in unsubsidized employment during the second quarter after exiting the

program. Title I Youth includes participants in education or training activities or those in unsubsidized employment during the same period.

- Employment Rate—4th Quarter After Exit: Similar to the previous measure, this one calculates the percentage of participants in unsubsidized employment during the fourth quarter after program exit. Title I Youth considers participants in education or training activities or those in unsubsidized employment during the same period.
- Median Earnings—2nd Quarter After Exit: This measure focuses on the median earnings of participants who are in unsubsidized employment during the second quarter after exiting the program. It provides insight into program participants' financial outcomes.
- Credential Attainment: the percentage of participants enrolled in an education or training program (excluding those in on-the-job training or customized training) who attain a recognized postsecondary credential or a secondary school diploma (or its recognized equivalent) during participation in the program or within one year after exit. Suppose a participant attains a secondary school diploma or its equivalent. In that case, they are included in this percentage only if they are also employed or enrolled in an education/training program leading to a recognized postsecondary credential within one year after exit.
- The Measurable Skill Gains (MSG) indicator is a crucial metric that WIOA requires. It aims to track and measure the progress and achievements made by WIOA participants who are engaged in training or education leading to a recognized post-secondary credential or certificate during a program year. Specifically, MSG focuses on participants who are achieving documented academic, technical, occupational, or other forms of progress toward obtaining a credential or employment. It acknowledges the tangible skills and knowledge gained by individuals as they advance through their educational or training journey. In summary, MSG provides insight into the skill development of program participants, emphasizing their growth and readiness for the workforce. It's a valuable measure for assessing the effectiveness of workforce development programs in preparing individuals for meaningful employment opportunities.

These indicators help assess the effectiveness of workforce development programs in achieving positive outcomes for individuals served by the system's core programs.

Beyond the DWD's organizational structure and continuous strategy to align and coordinate, other workforce system partners can further build on the service delivery model, especially to the communities and individuals with employment barriers accomplished through the one-stop Certification process and the Work Ready Communities—Next Generation model.

<u>One-Stop Certification</u>

The first opportunity is to update the One-Stop Certification process to ensure that customers of WIOA can find consistent services across each of the career center locations. Currently, the One-Stop Certification process involves recognizing Kentucky Career Centers (KCC) across a three-tier approach:

a Comprehensive Career Center, an Affiliate Career Center, and a KCC Access Point. The requirements are as follows:

- Each Local Workforce Development Area (LWDA) must have at least one Comprehensive Career Center with Title I staff present and access to each partner program that provides the required career services, training services, and business services.
- Affiliate Career Centers are designed to make the programs, services, and activities from one or more KCC partners, but not all partners, available to job seekers and employers. The Affiliate Career Center can be a Specialized Career Center that addresses the specific needs of certain groups of job seekers and /or employers, like those of dislocated workers, youth, or key industry sectors or clusters. Affiliate Career Centers may also be used for a network of affiliates or a network of partners with linked access to affiliates.
- KCC Access Points can be mobile or permanent locations with one designated point of contact. At a minimum, a KCC Access Point will have qualified individual(s) cross-educated in all six Workforce Innovation and Opportunity Act (WIOA) core programs and will refer job seekers and employers to partner staff at Comprehensive and/or Affiliate KCCs.

Since the inception of these guidelines, the Department of Workforce Development has grown to encompass all the core WIOA programs with the potential to increase services to jobseekers, workers, and employers at physical locations and hybrid locations within the three-tier One-Stop system. The updated One-Stop Certification process would expand to ensure consistency, availability, and accessibility for consumers to reach workforce services. Furthermore, the hybrid service delivery model will be explored in greater detail during the update to the One-Stop Certification process.

Work Ready Communities – Next Generation

The Work Ready Communities initiative and certification program started over a decade ago in Kentucky to highlight and measure counties' readiness for economic development investment through their workforce preparation. They were designed to be an assurance to businesses and industries that a community is committed to providing the highly skilled workforce required in a competitive global economy. Through this effort, Kentucky communities assessed their workforce strengths and followed a process to become certified as Work Ready or Work Ready in Progress. The certification assessed high school graduation rates, post-secondary credential attainment, soft skills development, internet availability, and labor force participation rate.

Work Ready Communities program has been highly engaged and has widespread brand recognition in the Commonwealth. However, the pandemic and the changes in the economic and workforce landscape have led to the need to bring Work Ready Communities into its next phase.

To create the next generation of Work Ready Communities, the Kentucky Workforce Innovation Board (KWIB) took on the opportunity to understand the perspectives of various stakeholders, including economic developers (both local to Kentucky and regional to the Southeastern part of the US), local

elected officials, businesses, and stakeholders in the system, such as educators and community-based organizations. Below are findings from dedicated focus groups that paved the way to a better:

- Work Ready Communities needs a revamp. The program needs to address the current economic and workforce transition
- Communities need to be able to understand the supply of hard skills and soft skills
- Communities need to understand the demand for the skills
- What is the capacity of high schools/community colleges to build a pipeline for in-demand skills?
- Understanding of untapped talent and service providers that support these population pools
- Utilizing regionalism as a strength; reflecting on commuting patterns
- How are communities supporting workers, specifically as it relates to transportation, housing, and childcare; these are components that bring quality of life.
- How are communities attracting talent?

Understanding these components from the community members themselves, the revamped version adopted by the KWIB building strategy into the next iteration of Work Ready Communities that includes:

Strategic Metrics:

- Untapped Talent Availability
- Local & Regional Occupational Supply & Demand with Education & Workforce Alignment
- Work Based Learning

Talent Ready Metrics:

- Early Childhood Education (Childcare)
- Transportation
- Affordable Housing
- Broadband Availability
- Talent Attraction

Work Ready Communities—Next Generation allows core programs, Combined State Plan partners, and critical local workforce system partners to address the needs of individuals and businesses within a community by building talent awareness, capacity, and services that can be utilized.

Furthermore, the Customer Flow initiative focuses on both the individual job seeker and employer customers, and this effort is a critical component to ensuring Kentucky Career Center's (KCC) ability to deliver on the following brand promise: As Team Kentucky and experts of workforce development, the staff is 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, workforce development staff becomes a valuable, competitive, and best-in-class asset in the growth of the regional and national economy. By guiding, empowering, and inspiring KCC customers, the mission will continue 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 the identified goals for this project.

Specifically, the Kentucky Career Centers continue to improve their efforts of coordination of services through cross-training 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 is based on the needs of not only the individuals but staffing knowledge as well.

Kentucky continues to set knowledge and competent 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. 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.

Employer services are a critical component of the workforce development system. Given that it is the first goal of the Strategic Plan, it was one of the key components highlighted during the state planning listening sessions. Locally, the provisions to employers are delivered via the Business Services Teams (BSTs) that are localized and comprised of core programs, Combined State Plan partners, and others in the community that deliver workforce programming to employers. Various programs and partner activities are coordinated through the local BST network to ensure maximum delivery of quality services

as each program is familiar with partner services and can make referrals; this provides businesses an opportunity to rely on trusted relationships with access to the gamut of business services.

Business Service Teams are designed to provide a primary point of contact for employer customers. The structure of the BSTs is comprised of three levels, each of which may act as a point of entry for contact with companies. BST is a Kentucky Career Center (KCC) system partner personnel responsible for coordinating BST teams locally and delivering services to businesses and industries in their workforce area. BSTs include all local representatives from the core programs, Combined State Plan partners, and workforce system partners. Moreover, the goals of the BSTs aligned with the objectives of the Strategic Plan:

1a: Create a workforce development system that is valued by employers.

1b: Establish a clear channel for employer engagement in workforce development services.

1c: Increase the number of employers participating in work-based learning experiences and apprenticeships, while also establishing employer champions.

1d: Engage employers in education efforts from early childhood through Kindergarten, Grade 12, and postsecondary study.

1e: Leverage employer data on workforce projections and training needs..

The unified business service plan that locally is followed is being further piloted for continuous improvement via the Statewide Workforce and Talent Team (SWATT). SWATT is a group of statewide organizations committed to improved measurement, coordination and delivery of workforce development solutions and services to Kentucky employers.

Importantly, business services are not limited to one entity or one Team Kentucky representative, business services are an act of the entire system to showcase the value each of the organizations at the Kentucky Career Center, and in partnership with the Kentucky Career Center, can bring.

Finally, the Kentucky Integrated Business Engagement System (KIBES), which operates on the Salesforce platform, provides connectivity to the business-facing workforce development staff across the Commonwealth. Through KIBES, BST members and workforce partners can communicate and track the progress of company contacts, ongoing relationships, programs and activities utilized, and the overall status of company engagement. Having BST members on one platform makes collaboration possible as an existing company record owner could introduce their colleague to a unique program or opportunity for the business customer. Both digital and in-person collaboration among Kentucky's business services have allowed the system to be proactive in helping companies recruit, develop, and retain talent while also helping companies access labor market information, innovative workforce development practices, and resources from partners to lower costs and increase opportunities for all Kentuckians.

E. PARTNER ENGAGEMENT WITH EDUCATIONAL INSTITUTIONS AND OTHER EDUCATION AND TRAINING PROVIDERS.

Describe how the State's Strategies will engage the State's community colleges, adult education providers, area career and technical education schools, providers on the State's eligible training provider list, and other education and training providers, as partners in the workforce development system to create a job-driven education and training system. WIOA section 102(b)(2)(B)(iv). Include how the State's strategies will enable the State to leverage other Federal, State, and local investments to enhance access to workforce development programs at these institutions.

As described in several sections of the State Plan, engaging with educational partners is of critical importance for Kentucky to build a world class workforce that meets the demands of tomorrow. Education partners ranging from early childhood education to primary, secondary, and post-secondary institutions are involved in the state workforce board (Kentucky Workforce Development Board), on the Education and Workforce Collaborative, and across multiple initiatives mentioned previously, including: LAUNCH, Education First Employers (Kentucky Community and Technical College System program), 60x30 Goal (Council on Postsecondary Education initiative), Everybody Counts (ELC initiative to connect students to employment, post-secondary, or both), TRACK (pre-apprenticeship program), and Registered Apprenticeships.

In specific reference to Kentucky Community and Technical College System (KCTCS), engagement with the system of 16-colleges is wide across the state and deep in specific projects. Several have been mentioned throughout the State Plan, but it is important to highlight the critical role community colleges play in Kentucky and nationwide. For example, FAME was described previously as a successful Kentucky-founded framework that is adopted in over a dozen states, the successful structure involves having the local community college as the anchor for the program. KCTCS serves as that anchor by providing coaching, mentorship, and serving as a liaison between the students and the host employers. This is just one example of how KCTCS plays an integral role in training the current and future workforce in Kentucky. There are other examples of providing agile workforce training delivering directly to the business through a custom designed curriculum to numerous businesses in the commonwealth, including building a specialized training center focused on the new EV battery production on-site with the two largest EV battery plants in the world.

One of the key avenues is to continuously drive conversation between employers and educators to find opportunities to strengthen training and overall educational programs. Further, the importance of engaging teachers, counselors, and parents was highlighted throughout the listening session. The opportunity for this lies in the expansion of the various "-ships" that include internships, mentorships, coops, and apprenticeships, as these Work-Based Learning (WBL) programs inherently ensure communication between education and employment, which further connects the wider support network of the learners to the programming.

Increasing WBL also opens the horizon of all possible career and post-secondary options for learners and, importantly, all the options to reach the various goals, whether it be through higher-education, post-secondary credentials, or on-the-job instructions. When WBL is involved, the opportunity to leverage

federal, state, and local investments becomes more realistic as WBL provides a win-win-win scenario for the learner, employer, and the community.

It is also worth highlighting the previously mentioned Work Ready Communities Next Generation initiative as an important factor of the newly adopted version is to build consensus, understanding of skills opportunities and gaps, and relationships across the whole education spectrum.

F. 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.

The Commonwealth of Kentucky believes in the importance of education attainment for all Kentuckians to attain employment and grow within their selected profession. Several strategies are described within the plan that are worth highlighting as opportunities to grow post-secondary credentials. As mentioned in the previous section, the aspects of Work-Based Learning (WBL) are tremendously valuable to the learner and the employer. Through a WBL opportunity, an industry-recognized credential or certificate is not always a requirement, but in many settings, there are opportunities to earn a stackable and portable credential.

The Tech Ready Apprentices for Careers in Kentucky (TRACK) program is set up as a pre-apprenticeship and a youth apprenticeship model to allow students to enter good quality jobs by earning a TRACK certificate if participating in a pre-apprenticeship or a Registered Apprenticeship certificate if participating in a youth apprenticeship. Students can stack these portable credentials to earn post-secondary credentials ranging from next-level apprenticeship programs to associate degrees and beyond. Similarly, Everybody Counts provides an avenue for students to choose immediate employment, post-secondary education, or both at the same time. When the Governor launched Everybody Counts, the idea was that there was an opportunity for all Kentucky students to find the right fit for their dreams and aspirations – Everybody Counts makes this bridge easier to find and cross.

Another avenue that learners can embrace in attaining post-secondary credentials is the Work Ready Scholarship program, which provides last mile/dollar support after federal aid for individuals to attain a credential in a high-demand industry at no cost. The only requirements are that the individual must be a Kentucky resident, with a high school diploma or working towards a GED and not have an attained associate degree or higher. Should a person not have a GED, the Office of Adult Education can assist with additional help through the Integrated Adult Education and Training (IET) to attain other recognized industry credentials that can be stacked in complement to the GED.

Moreover, employers can also play a key role in providing pathways to post-secondary credentials through engagement with the workforce development system. Another key takeaway from the local listening sessions was that the lines between student and worker are blending, where education is conducted through hands-on modules on the shop floor or in a hospital ward. This is evident in the nationally operated, but Kentucky-founded, program of FAME (previously discussed). Part of FAME's

success is being anchored to one of the 16 KCTCS colleges that provide not only the educational component, but also mentorship and career coaching. Within the opportunities to attain a credential through KCTCS services, employers can engage in Workforce Solutions services and even reduce the costs by applying for TRAINS funding that substantially subsidizes these on-the-job trainings. Furthermore, employers can participate in the Education First Employer program to leverage their tuition assistance initiatives.

It would not be workforce development if Registered Apprenticeship were not highlighted as a key driver of post-secondary, nationally recognized, portable credentials. As noted previously, Registered Apprenticeship grow year over year in number of apprentices, employer sponsors, and various programs. Kentuckians have the opportunity to enter any industry of their choice and find an apprenticeship program that meets their career aspirations.

Finally, off-the-shelf virtual product of WIN Career Readiness System provides self-paced modules in soft skills (communication, critical thinking, professionalism, etc.), college preparation, and digital literacy training, allowing Kentuckians to access microbadges, certificates, and certification (after a proctored test) to become more marketable for job opportunities or promotions.

Emphasized by employers, soft skills continue to be the number one requested set of skills required in the workplace. The tools mentioned above with the various DWD services provide individual customer opportunities to harness critical soft skills to be considered “work ready”. The importance of soft skills as the foundation to employment is important, as these skills are transferable across industries, contribute to a more diverse and successful work experience, strengthen collaboration in a team or a group setting, and develop leadership and effective communication tools for continuous improvement and growth in a chosen career.

Whether in formalized training or through career services, DWD will continue to focus and build the soft skills necessary for individual customers to succeed in the workplace and be considered “work ready” across all industries.

G. 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.

Coordinating with economic development is one of the best ways to ensure the jobs of tomorrow are complemented with appropriate career services, training, and education. In fact, in the most recent economic development strategic planning conducted by the Cabinet for Economic Development (CED), workforce development was the number two most important issue. To address their economic development strategic plan and to assist with ELC’s strategic initiatives, CED and ELC partners regularly on the cabinet and agency level, including in collaboration for economic development site visits, data sharing, and engaging on respective boards and committees. Several local economic developers in Kentucky have innovative workforce development models that are executed to maximize the opportunities in marrying economic and workforce development initiatives. For example, Covington

has a stipulation for all incentivized projects to engage with the local workforce development system for services.

Further on, the Statewide Workforce and Talent Team (SWATT) model is the backbone of engaging businesses proactively with workforce services. Through statewide, regional, and local relationships between the local economic development agencies and Kentucky Career Center partners, the opportunity to anticipate and support businesses is greater. Central to this effort is the Workforce Talent Project Management Team operating within the Office of Industry and Apprenticeship Services Acting as an "easy button" for employers, the team connects businesses with the right people, programs and partnerships to deliver tailored workforce solutions. Services include recruitment support, work-based learning and training programs, guidance on financial incentives, and rapid response assistance during workforce transitions.

SWATT is responding to feedback from Kentucky employers to design and pilot a unified approach to provide workforce solutions to employers. The data-informed unified strategy is intended to improve coordination, responsiveness, and results among partners and ultimately drive workforce participation and business growth. After shared metrics are established and the initial pilot is offered and measured, the strategy will be captured in a model of operating excellence for implementation statewide.

Another partnership with economic development is with the Work Ready Communities initiative where economic development was the originator of the program a decade ago. Fast forward to today, Work Ready Communities Next Generation was adopted thanks to input from economic developers (both local to Kentucky and regional to the Southeastern part of the US), local elected officials, businesses, and stakeholders in the system, such as educators and community-based organizations. Below are findings from dedicated focus groups that paved the way to a better understanding of the pulse of Work Ready Communities and the opportunities possible:

- Work Ready Communities needs a revamp; the program needs to address current economic and workforce transition
- Communities need to be able to understand the supply of hard skills and soft skills
- Communities need to understand the demand for skills
- What is the capacity of high schools/community colleges in to build a pipeline for in-demand skills?
- Understanding of untapped talent and service providers that support these population pools
- Utilizing regionalism as a strength, reflecting on commuting patterns
- How are communities supporting workers, specifically as it relates to transportation, housing, and childcare; these are components that bring quality of life.
- How are communities attracting talent?

Emphasized by employers, essential skills continue to be the number one requested set of skills required in the workplace. The tools mentioned above with the various DWD services provide individual customer opportunities to harness critical soft skills to be considered "work ready". The importance of soft skills as the foundation to employment is important, as these skills are transferable across industries, contribute to a more diverse and successful work experience, strengthen collaboration in a team or a group setting, and develop leadership and effective communication tools for continuous improvement and growth in a chosen career.

Whether in formalized training or through career services, DWD will continue to focus and build the soft skills necessary for individual customers to succeed in the workplace and be considered "work ready" across all industries.

On the shared technology side, CED, ELC, and KCC Business Service Teams (BST) utilize the Kentucky Integrated Business Engagement System (KIBES), which operates on the Salesforce platform, and provides connectivity to the business-facing workforce development staff across the Commonwealth. Through KIBES, BST members and workforce partners representing ten workforce regions can communicate and track the progress of company contacts, ongoing relationships, programs and activities utilized, and the overall status of company engagement. Having BST members on one platform makes collaboration possible as an existing company record owner could introduce their colleague to a unique program or opportunity for the business customer. Both digital and in-person collaboration among Kentucky's business services have allowed the system to be proactive in helping companies recruit, develop, and retain talent while also helping companies access labor market information, innovative workforce development practices, and resources from partners to lower costs and increase opportunities for all Kentuckians.

Finally, CED and ELC share the real-time data from Dun and Bradstreet (D&B) and EconoVue to anticipate potential layoffs and rapid response activity; the Commonwealth utilizes the Dun and Bradstreet (D&B) Market Insight System to align business needs with core partner services. This innovative, proactive approach uses real-time data and the future financial outlook of a company to identify those businesses that are in a growth pattern, in a stable state, or experiencing a potential downturn and need early intervention for layoff aversion strategies.

In PY22, an investment was made into the EconoVue platform that enhances this D&B data through an intuitive dashboard interface, allowing business-facing core program sponsors to narrow down companies based on geography, industry segment, employer risk, business growth/downturn, employer size, and view time series data of trends. With a local level understanding of D&B data, the EconoVue enhancement provides added tools to be proactive in layoff aversion strategies.

B. STATE OPERATING SYSTEMS AND POLICIES

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

1. THE STATE OPERATING SYSTEMS THAT WILL SUPPORT 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 endurable 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.

The Kentucky Career Centers utilize the Kentucky Engagement Enterprise Suite (KEE Suite), a specialized Customer Relationship Management (CRM) system designed to manage and support workforce development programs. KEE Suite streamlines communication for staff, employers, and training providers while ensuring oversight, compliance, and security of programs. Continuously working to adopt new technologies and updates to enhance program efficiency and effectiveness, KEE Suite features three integrated portals.

- Citizen Connect-Provides individuals with access to workforce activities, services, and available training opportunities.
- Business Connect-Enables individuals to find job openings, WIOA-eligible trainings, and local workforce development programs.
- Staff Connect-Supports case managers in registering individuals, conducting assessments, determining eligibility, creating employment plans, managing cases, and assigning services.

By centralizing data, automating processes, and offering tracking, KEE Suite supports workforce development. Committed to evolving with Kentucky's workforce, it provides a flexible, scalable foundation. Regular updates and the adoption of new technology keep the KEE Suite innovative for supporting our ongoing economic growth. KEE Suite is used for Title I and Title III programs, KARES is used for the Title II program, and CMS is used for the Title IV program. OVR, the Title IV program, is in the process of designing and implementing a new system with Geographic Solutions.

The commonwealth is reviewing systems that will allow for the seamless integration of all programs. Meanwhile, DWD continues to merge data files in order to accomplish the coordinated implementation of the state strategies.

The Kentucky Longitudinal Data System (KLDS) is a collection of linked data from birth records through the workforce. Available data includes pre-K, K-12, postsecondary education, employment, wages, and much more. LMI produces labor force and unemployment metrics, employment and wages by industry and occupation, occupational projections, and more. When combining data from the KLDS and LMI, Kentuckians are able to get a well-rounded, informative view to coordinate the implementation of state strategies and initiatives.

Some examples of state strategies include:

• Understanding the employment and wages of postsecondary graduates

• Aligning in-demand occupations to Career and Technical Education career pathways

• Connecting adult education GED completers to WIOA measures for federal reporting

• Building a simulator that helps families understand the impact of work supports on their budget

• Creating the Career Explorer Tool that allows students and job seekers to assess their knowledge, skills, and abilities to then be then aligned to matching careers

• Creating a dashboard that allows students to understand the cost of college while providing information about in-demand jobs

• Align the supply of credentialed Kentuckians, current employment outcomes, and future demand for jobs in Kentucky

• Understand the youth and young adults of Kentucky and their outcomes based on area, race, gender, age, and available service providers

• Providing analyses for LWDAs regarding the labor force, industry and occupational wages and employment, long-term projections, unemployment insurance claims, and demographics

• Developing a tool to summarize Kentucky’s workforce system and provide metrics on labor market health, workforce funding distribution, and service outcomes for employers, customers, the Office of Unemployment Insurance and Adult Education

• Utilizing unemployment claims data to provide key indicators including weekly initial claims, % of overall claims by county, claims by industry, and trends by select demographic indicators

• Creating a civilian labor force report to provide users with annual and monthly estimates across different geographies and timeframes

The coordinated case management system for the Commonwealth of Kentucky allows for efficient co-enrollment across WIOA direct service providers for the Adult, Dislocated Worker, and Youth programs, and the majority of the programs in the Career Development Office: Wagner – Peyser, JVSG, Trade, and RESEA. The upgrades to the current case management system have made improvements that will increase the efficiency and validity of the data collection among the program partners and allow for easier referrals once eligibility has been determined. The coordination and warm hand-off from Kentucky Career Center programs through the shared case management system helps to break down the silos of the independent program staff and allows for a holistic approach to the workforce participant's needs. There is a streamlined process for referrals from the other partners in the KCC to ensure that the needs of those communities are met.

For Kentucky's job banks, the Kentucky Career Portal powered by the National Labor Exchange (NLx) is an automatic job-match engine containing a set of online tools for career seekers and employers. Career seekers can search for jobs and apply for employment. Kentucky Career Portal allows job candidates to assess their potential for short-term and long-term business needs. For employers, this labor exchange system assists them with posting career openings.

The Kentucky Career Portal system allows employers remote access, 24/7, to manage their workforce account.

For communication to customers and internal partners, email and phone systems are complemented by the accessibility of virtual platforms such as Microsoft TEAMS or Zoom; both are used regularly and appropriately adjusted to customer needs.

2. THE STATE POLICIES THAT WILL SUPPORT THE IMPLEMENTATION OF THE STATE'S STRATEGIES (FOR EXAMPLE. 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 AND ANY ADDITIONAL GUIDANCE FOR ONE-STOP PARTNER CONTRIBUTIONS.

Based on Policy 18-001, titled "Co-Enrollment Requirements for all One-Stop Partners," is designed to support the co-enrollment in multiple programs delivers comprehensive services to customers who have barriers to employment. 20 C.F.R §679.560 describes the creation and content of the Local Board's state plan. More specifically, (b)(2)(ii) dictates that Local Boards must describe how they will work with entities carrying out core programs to develop career pathways and co-enrollment, as appropriate.

Coordinating services and eliminating barriers to success early in the process will reduce the likelihood that customers will have to re-enter the public workforce system in the future. WIOA gives states the authority to establish policies and guidelines related to verifying WIOA and Employment Services eligibility as long as the policies are consistent with WIOA, the WIOA regulations, the Wagner-Peyser Act, the Trade Adjustment Assistance Act, among other regulations, and federal statutes.

The *One Workforce System* embraces a culture of a united workforce so that any staff member within a Kentucky Career Center may serve a customer (job-seeker or business). In order to implement co-enrollment, individuals enrolled in WIOA Title I Adult and Dislocated Worker Programs must be co-enrolled in both Wagner-Peyser and the Trade Adjustment Assistance (TAA) Programs, if applicable. Although WIOA encourages co-enrollment in all four core programs (i.e., WIOA Title I, Wagner-Peyser, Vocational Rehabilitation and Adult Education), the efforts of co-enrollment addresses REQUIRED co-enrollment of participants under the WIOA Title I Adult and Dislocated Worker (DW) programs, Wagner-Peyser, and the Trade Adjustment Assistance.

In addition to the United States Department of Labor (USDOL) required co-enrollment with the WIOA DW program, based on the needs of the trade-affected worker, co-enrollment can be further enhanced and expanded to include a broad range of services available through other workforce programs in order to produce successful outcomes. Such programs include, but are not limited to, Wagner-Peyser Act Employment Service (ES) activities, WIOA Adult program, WIOA Dislocated Worker Grant (DWG) program, Unemployment Insurance (UI), other WIOA partner programs, faith-based and community-based programs, vocational rehabilitation services, and services for veterans. Partnerships may be facilitated at the state and local board level, as that leadership is deemed vital to the success of co-enrollment.

The policy in Kentucky states that adults and dislocated workers who receive KCC services other than self-service and informational activities will be co-enrolled in Wagner-Peyser, WIOA, and if eligible Trade Adjustment Assistance 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 date of birth (DOB) / Veteran (VETS) information in the system of record. Customers will then be co-enrolled and counted in both Wagner-Peyser, WIOA, and if eligible Trade Adjustment Assistance (TAA) performance measures.

Under 20 CFR §680.110(a), registration is the process of collecting information to support a determination of eligibility. Participation occurs after the registration process when the individual receives a staff-assisted WIOA service, which does not include self-service or information activities. Under 20 §CFR §680.110 (b), adults and dislocated workers who receive services funded under Title I other than self-service or informational activities must be registered and must be a participant.

As part of the Welcome, Orientation, and Assessment (WOA), staff will verify the customer's DOB and VETS information, if applicable and record any activities that have been completed. An overnight batch process will then look for activities that trigger co-enrollment and the customer will be enrolled in both WIOA, Wagner-Peyser, and if eligible, Trade Adjustment Assistance.

Eligible registrants may access self-service and informational services available at all locations. Customers may not receive any funded career or training services until additional WIOA eligibility documentation has been completed. Staff should check the DOB/VETS Verification tab in the system of record on prior registered customers who return to any Career Center for services and update the record with proper DOB/VETS information as legacy records will not have complete information. Staff should determine if the current DOB documentation has expired and update it as needed. Failure of the customer to provide needed documentation shall not preclude delivery of services to the customer.

TAA Program, WIOA DW, and DWG co-enrollment may provide trade-affected workers with career and supportive services that are not available through the TAA Program. DWG co-enrollment can be used to provide potential trade-affected workers with career, training, and supportive services when state WIOA DW funds are not sufficient to provide such services. Eligible trade-affected workers may receive DWG- funded training only if the TAA Program does not cover the available training.

DWG and TAA funds must be managed in a coordinated manner to best meet the needs of the trade-affected workers while abiding by all applicable statutes, regulations, and federal policies. The DWG project guidance, TEGL No. 12-19, provides more details on the circumstances for provisions of training. The Trade Act, as amended, allows states to pay for a training program approved under the Act with TAA funds or from other sources, but does not allow duplication of payment of training costs. (See 20 CFR §618.625.) Under certain circumstances, a state can use funding from more than one program to fund training; however, TAA funds can only reimburse training costs incurred after a trade-affected worker was certified and determined individually eligible for TAA, and that training must be TAA-approved.

Additionally, 20 CFR §618.625(c) requires that the TAA Program be the primary source of assistance to trade-affected workers. To the extent trade-affected workers enrolled in the TAA Program require assistance or services not authorized under the TAA Program, or for which TAA Program funds are unavailable or insufficient (including for required employment and case management services), states must provide such assistance through other federal programs, including programs in the AJC network.

Additional guidance for one-stop partner contributions is provided through our WIOA Memorandum of Understanding (MOU) and an Infrastructure Funding Agreement (IFA) process addressing services for building up the workforce. The memorandum of understanding (MOU) is a formal document that spells out what everyone agrees on about running and managing One-Stop Career Centers in a certain Local Workforce Development Board Area (LWDA). The parties usually include the Chief Elected Official (CEO), the Local Workforce Development Board (LWDB), and other partners that offer services to the workforce. The MOU covers shared customers, shared services, and shared costs for workforce development and services that help people find jobs and improve their skills, companies, and businesses. The MOU has a part called the IFA that talks about funds for the infrastructure costs of running the One-Stop Career Centers. It spells out how the LWDB, CEO, and partners will handle and distribute money to meet the infrastructure needs of the centers. The IFA lets the LWDB and each partner talk about

changes to the funding for services and running costs under the MOU because funds are usually allocated once a year.

WIOA requires the MOU and IFA to be made. The process includes finding locations for the centers, making a running budget that includes infrastructure costs, and preparing and agreeing to the IFA. The legal paperwork is the result, but the attention is not just on service sites; it's also on how well partners work together.

In Kentucky, the MOU defines the roles and responsibilities of each partner as mutually agreed by the parties for the operation of the Kentucky Career Center (KCC) service delivery system in the WIOA Local Workforce Area as required under WIOA and includes the following:

- WIOA Section 121(c) requires that each Local Workforce Development Board (LWDB), with the agreement of the Area's Chief Elected Official (CEO), develop and enter into a memorandum of understanding (between the local board and the one-stop partners), with all the entities that serve as partners in the KCC delivery system that operates in each LWDB's local area.

- WIOA Section 121(b)(1)(A)(iii) mandates all entities that are required partners in a local area to enter into a memorandum of understanding with the LWDB in the respective area pursuant to WIOA Section 121(c).

- WIOA Section 121(b)(1) identifies the federal programs and requires that the services and activities under each of those programs must be made available through each local area's KCC delivery system. The entities that receive the federal funds for each of these programs and/or have the responsibility to administer the respective programs in the Area are required partners under WIOA Section 121(b)(1).

- WIOA Section 121(b)(2) prescribes how entities that provide programs other than those required under WIOA Section 121(b)(1)(B) may participate in a local area's KCC delivery system as "additional partners" and provide the services available under their programs through the KCC delivery system.

- Per WIOA Section 121(b)(2)(A), both required, and additional partners are included as parties to the MOU. Therefore, all entities that participate in an Area's KCC delivery system as KCC partners (Partners), whether required or additional, must be parties to this MOU and must abide by the terms prescribed herein and by all applicable federal, state, and local rules, plans, and policies as applicable and authorized under the Partner's program and in keeping with federal guidelines.

- WIOA Section 121(b)(1)(A)(iv) indicates that the requirements of each partner's authorizing legislation continue to apply under the KCC system and that participation in the KCC delivery system is in addition to other requirements applicable to each partner's program under each authorizing law.

- The Department of Labor (DOL) is the federal agency responsible for administering workforce development programs, including WIOA.
- The DOL recognizes the Kentucky Education and Labor as the agency responsible for the administration and oversight of workforce development and employment-related programs in the Commonwealth of Kentucky—including WIOA. The Department of Workforce Development (DWD) fulfills this role on behalf of the Cabinet.

In essence, the WIOA MOU IFA method is a crucial framework that ensures all stakeholders work in unison to deliver comprehensive workforce services. This approach not only keeps costs in check but also underscores the importance of each partner's role in the work.

3. STATE PROGRAM AND STATE BOARD OVERVIEW

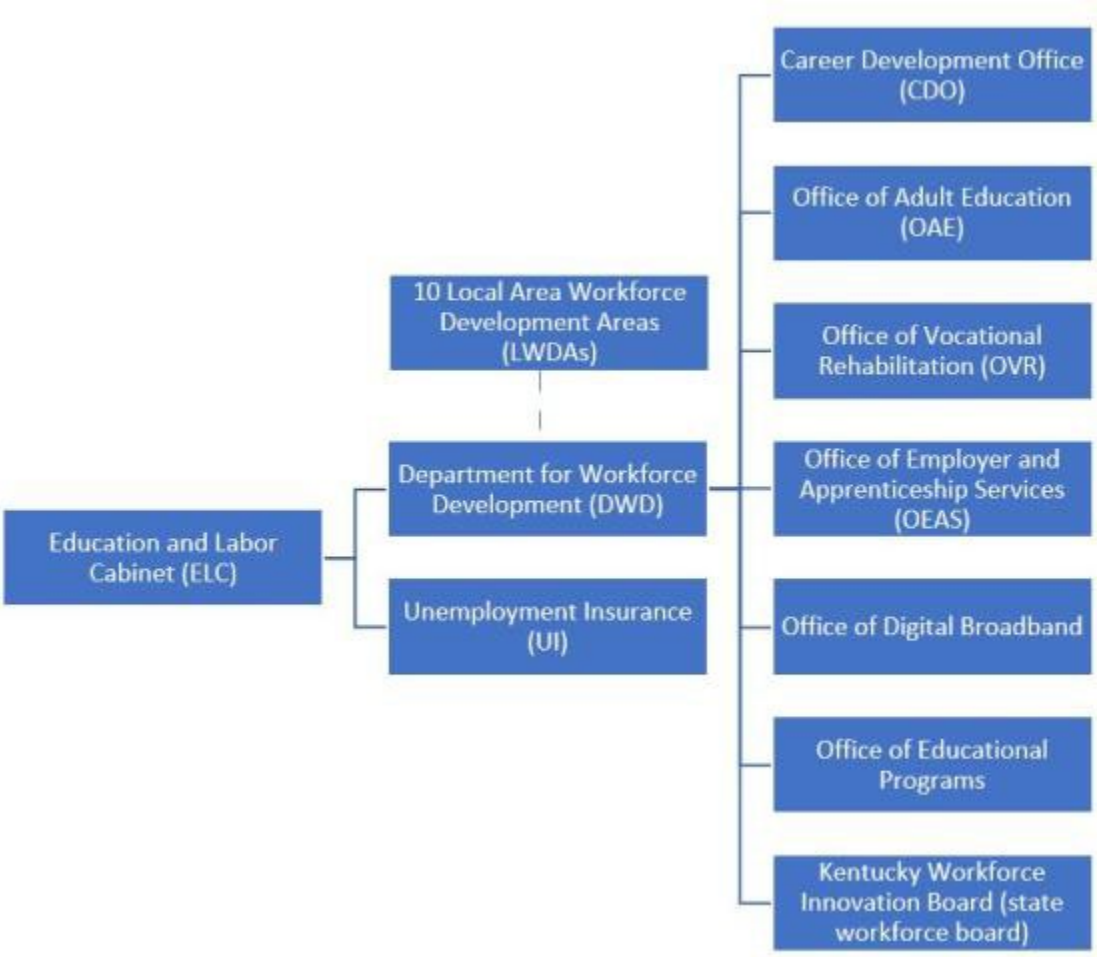
A. STATE AGENCY ORGANIZATION

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.

Commonwealth of Kentucky's workforce development, education, and training activities connected to the core WIOA programs are housed within the Department of Workforce Development (DWD) at the Kentucky Education & Labor Cabinet (ELC). Title I programs (adult, dislocated worker, and youth) are administered by the 10 Local Workforce Development Boards (located across the five regions of Kentucky, pictured below) and their respective service providers, while Title II program (Adult Education and Family Literacy) is within the Kentucky Office of Adult Education, Title III (Wagner-Peyser) is within the Career Development Office. Title IV (Vocational Rehabilitation) is within the Office of Vocational Rehabilitation (OVR). DWD also houses the state-registered apprenticeship agency known as the Office of Industry and Apprenticeship Services (OIAS) and the Office of Educational Programs, which has a targeted mission of growing youth employment through the Governor's Everybody Counts initiative. Furthermore, the Kentucky Workforce Innovation Board (KWIB) is administratively attached and within DWD.

In addition to the core WIOA programs, this Combined State Plan incorporates: Jobs for Veterans State Grant (JVSG), Trade Adjustment Assistance (TAA), Migrant and Seasonal Farmworkers (MSFW), and Unemployment Insurance (UI) programs. JVSG, TAA, and MSFW are in the Career Development Office (CDO) within DWD.

Below is the Education and Labor Cabinet Organizational Chart.



B. STATE BOARD

Provide a description of the State Board activities that will assist State Board members and staff in carrying out State Board functions effectively. Also, provide a membership roster for the State Board consistent with 20 CFR 679.110-120, including members' organizational affiliations and position titles.

New KWIB members receive orientation to the responsibilities of being KWIB member and opportunities to engage across the various committees and workgroups. The goal is to discuss the strategic nature of the board and where the perspective of the board member can truly drive strategy to be more agile and responsive to the board's goals. Orientation covers the following state board activities:

Activities include assisting the Governor in the following:

(a) Development, implementation, and modification of the 4-year State Plan;

(b) Review of statewide policies, programs, and recommendations on actions that the state must take to align workforce development programs to support a comprehensive and streamlined workforce development system. Such review of policies, programs, and recommendations must include a review and provision of comments on the State Plans, if any, for programs and activities of one-stop partners that are not core programs;

(c) Development and continuous improvement of the workforce development system, including—

(1) Identification of barriers and means for removing barriers to better coordinate, align, and avoid duplication among programs and activities;

(2) Development of strategies to support career pathways for the purpose of providing individuals, including low-skilled adults, youth, and individuals with barriers to employment, including individuals with disabilities, with workforce investment activities, education, and supportive services to enter or retain employment;

(3) Development of strategies to provide effective outreach to and improved access for individuals and employers who could benefit from the workforce development system;

(4) Development and expansion of strategies to meet the needs of employers, workers, and job seekers particularly through industry or sector partnerships related to in-demand industry sectors and occupations;

(5) Identification of regions, including planning regions for WIOA sec. 106(a), and the designation of local areas under WIOA sec. 106, after consultation with Local WDBs and chief elected officials;

(6) Develop and continuously improve of the one-stop delivery system in local areas, including assisting Local WDBs, one-stop operators, one-stop partners, and providers. Such assistance includes assistance with planning and delivering services, including training and supportive services, to support the effective delivery of services to workers, job seekers, and employers, and

(7) Development of strategies to support staff training and awareness across the workforce development system and its programs;

(d) Development and updating of comprehensive State performance and accountability measures to assess core program effectiveness under WIOA sec. 116(b);

(e) Identification and dissemination of information on best practices, including best practices for—

(1) The effective operation of one-stop centers, relating to the use of business outreach, partnerships, and service delivery strategies, including strategies for serving individuals with barriers to employment;

(2) The development of effective Local WDBs, which may include information on factors that contribute to enabling Local WDBs to exceed negotiated local levels of performance, sustain fiscal integrity, and achieve other measures of effectiveness; and

(3) Effective training programs that respond to real-time labor market analysis, that effectively use direct assessment and prior learning assessment to measure an individual's prior knowledge, skills, competencies, and experiences for adaptability, to support efficient placement into employment or career pathways;

(f) Development and review of statewide policies affecting the coordinated provision of services through the State's one-stop delivery system described in WIOA sec. 121(e), including the development of—

(1) Objective criteria and procedures for use by Local WDBs in assessing the effectiveness, physical and programmatic accessibility and continuous improvement of one-stop centers. Where a Local WDB serves as the one-stop operator, the State WDB must use such criteria to assess and certify the one-stop center;

(2) Guidance for the allocation of one-stop center infrastructure funds under WIOA sec. 121(h); and

(3) Policies relating to the appropriate roles and contributions of entities carrying out one-stop partner programs within the one-stop delivery system, including approaches to facilitating equitable and efficient cost allocation in the system;

(g) Development of strategies for technological improvements to facilitate access to, and improve the quality of services and activities provided through the one-stop delivery system, including such improvements to—

(1) Enhance digital literacy skills (as defined in sec. 202 of the Museum and Library Service Act, 20 U.S.C. 9101);

(2) Accelerate acquisition of skills and recognized postsecondary credentials by participants;

(3) Strengthen professional development of providers and workforce professionals; and

(4) Ensure technology is accessible to individuals with disabilities and individuals residing in remote areas;

(h) Development of strategies for aligning technology and data systems across one-stop partner programs to enhance service delivery and improve efficiencies in reporting on performance accountability measures, including design implementation of common intake, data collection, case management information, and performance accountability measurement and reporting processes and the incorporation of local input into such design and implementation to improve coordination of services across one-stop partner programs;

(i) Development of allocation formulas for the distribution of funds for employment and training activities for adults and youth workforce investment activities, to local areas as permitted under WIOA secs. 128(b)(3) and 133(b)(3);

(j) Preparation of the annual reports described in paragraphs (1) and (2) of WIOA sec. 116(d);

(k) Development of the statewide workforce and labor market information system described in sec. 15(e) of the Wagner-Peyser Act; and

(l) Develop other policies that may promote statewide objectives for and enhance the performance of the workforce development system in the State.

Kentucky Workforce Innovation Board (KWIB) has 16 business representatives out of 32 voting members**, which creates a majority business representation on the state workforce board.**

	BOARD MEMBERS	TITLE	MEMBER TYPE	VOTING/NON-VOTING
1	Governor Andy Beshear	Governor of Kentucky	Government	Voting
2	Lori Ulrich, Chair	Marketing & Public Relations Manager, Fleming-Mason Energy	Business	Voting
3	Johnny W. Collett, Vice Chair	Deputy Director, University of Kentucky Human Development Institute (HDI)	Business	Voting
4	Beth Davisson	Vice President, Kentucky Chamber Foundation	Business	Voting
5	Adam Caswell	Vice President, Gravity Diagnostics	Business	Voting
6	Alice Houston	Owner, HJI Solutions	Business	Voting
7	David Hall	Vice President – Public Affairs, CSX Corporation	Business	Voting
8	Heidi Margulis	Business Representative	Business	Voting
9	William Downey	Regional Director of State Government Affairs, Toyota North America	Business	Voting
10	Susan Hershberg	Owner, Wiltshire Pantry	Business	Voting
11	Tom Lilienthal	Plant Manager, Novelis Corporation	Business	Voting
12	Kevin Nolan	CEO, GE Appliances	Business	Voting
13	Kevin Smith	Chief External Affairs Officer, Goodwill Industries of Kentucky	Business	Voting
14	Kim Menke	Owner, Provision Process Solutions	Business	Voting
15	Suhas Kulkarni	Owner, Frannet of Kentucky and Southern Indiana	Business	Voting

16	Selma Owens	Owner, Selma's Catering	Business – Small Business	Voting
17	Ryan Holmes	Project Manager, EHI Consultants	Business – Small Business	Voting
18	Todd Dunn	President, UAW Local 862	Labor	Voting
19	George Nichols	Teacher, Jefferson County Teachers Association	Labor	Voting
20	Robert Shelton	Training Director, IBEW Local 369	Labor	Voting
21	Annissa Franklin	Vice President, Urban League of Lexington	Workforce Representative	Voting
22	Kevin Middleton	President, United Way of Kentucky	Workforce Representative	Voting
23	Lyndon Pryor	President & CEO, Louisville Urban League	Workforce Representative	Voting
24	Dianne Owen	Director, West Kentucky Educational Cooperative	Workforce Representative	Voting
25	Sharon Price	Executive Director, Community Action Council	Workforce Representative	Voting
26	Senator Jimmy Higdon	State Senator	Legislative – Senate	Voting
27	Rep. Bobby McCool	State Representative	Legislative- House of Representatives	Voting
28	Judge Owen McNeill	Judge/Executive, Mason County, KY	Local Elected Official	Voting
29	Mayor J.H. Atkins	Mayor, Danville, KY	Local Elected Official	Voting
30	Mike Yoder	Commissioner, Department of Workforce Development	Core Partner	Voting
31	Cora McNabb	Executive Director, Kentucky Office of Vocational Rehabilitation	Core Partner	Voting
32	John Gregory	Executive Director, Kentucky Office of Adult Education	Core Partner	Voting
33	Lt Gov Jacqueline Coleman	Lieutenant Governor of Kentucky	Government Ex-Officio	Non-Voting
34	Jim Flynn	Executive Director, Kentucky Association of School Superintendents	Superintendent	Non-Voting
35	Aaron Thompson	President, KY Council on Postsecondary Education	Education	Non-Voting
36	Ryan Quarles	President, KCTCS	Education	Non-Voting

37	Robbie Fletcher	Commissioner, Kentucky Department of Education	Government Ex-Officio	Non-Voting
38	Secretary Jamie Link	Secretary, Education and Labor Cabinet	Government Ex-Officio	Non-Voting
39	Secretary Jeff Noel	Secretary, Cabinet for Economic Development	Government Ex-Officio	Non-Voting
40	Secretary John Hicks	Secretary, Governor's Executive Cabinet	Government Ex-Officio	Non-Voting

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

A. ASSESSMENT OF CORE AND ONE-STOP PROGRAM PARTNER PROGRAMS.

Describe how the core programs will be assessed each year based on State performance accountability measures described in section 116(b) of WIOA. 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. 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.

Currently, every core program and Combined State Plan partner conducts an assessment of their designated program. However, as we advance, DWD is placing all monitoring and assessments into the purview of the Division of Technical Assistance.

Assessing state performance and outcomes is an important function considering the review of local and regional planning. One avenue this can be accomplished is through the One-Stop Certification standards, where all partners are held accountable for their intended outcomes and performance; additionally, this is also an opportunity to assess customer satisfaction with the quality of services.

Further, instilling the opportunity for One-Stop partners to consider embracing good job principles in their service delivery is a way to advance the system. Good job principles encompass competitive wages, benefits, career advancement, voice, occupational safety, recruitment of untapped talent pools, and positive organizational culture. One-stop partners could assess the quality of jobs customers are placed in and, at the same time, the job quality businesses are hiring. Ensuring that individual customers and employers offer good job opportunities, outcomes should be higher employee satisfaction with better recruitment and retention for the business.

B. PREVIOUS ASSESSMENT RESULTS

For each four-year state plan and state plan modification, 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), in accordance with methods described in 4(A). Describe how the State is adapting its strategies based on these assessments.

The Department of Workforce Development (DWD) has widened its communication with core programs, one-stop partner programs, and Combined State Plan partners to ensure the effectiveness of service. Improvements include quarterly fiscal agent meetings and regular Q&A sessions to provide continuous technical assistance to all programs.

Additionally, the strength of DWD's organizational structure, with all core programs and Combined State Plan partners under one umbrella, provides opportunities for collaboration. As an example, the Career Development Office (CDO) is the lead agency overseeing Wagner-Peyser, TAA, JVSG, and other programs that host partner meetings where core programs and Combined State Plan partners can collaborate and improve the service delivery model across all programs. One example showing a collaborative effort is the Career Development Office (CDO), which has provided a quarterly partner training series over the past year with OVR, OAE & OUI. This collaboration pairs each agency with CDO to discuss and strategize how to strengthen existing partnerships, braiding resources, and referral processes.

Furthermore, coordinating the performance strategy among the core programs and Combined State Plan partners is an example of improving service delivery. By examining the five performance measures described below, DWD can align, coordinate, and leverage resources in each of the core programs to achieve not only positive and progressive performance measures but also deliver unified, high-quality service to the customer.

- Employment Rate - 2nd Quarter After Exit: this indicator represents the percentage of participants who are in unsubsidized employment during the second quarter after exiting the program. Title I Youth includes participants in education or training activities or those in unsubsidized employment during the same period.
- Employment Rate—4th Quarter After Exit: Similar to the previous measure, this one calculates the percentage of participants in unsubsidized employment during the fourth quarter after program exit. Title I Youth considers participants in education or training activities or those in unsubsidized employment during the same period.
- Median Earnings—2nd Quarter After Exit: This measure focuses on the median earnings of participants who are in unsubsidized employment during the second quarter after exiting the program. It provides insight into program participants' financial outcomes.
- Credential Attainment: the percentage of participants enrolled in an education or training program (excluding those in on-the-job training or customized training) who attain a recognized postsecondary credential or a secondary school diploma (or its recognized equivalent) during participation in the program or within one year after exit. Suppose a participant attains a

secondary school diploma or its equivalent. In that case, they are included in this percentage only if they are also employed or enrolled in an education/training program leading to a recognized postsecondary credential within one year after exit.

- The measurable Skill Gains (MSG) indicator is a crucial metric that WIOA requires. It aims to track and measure the progress and achievements made by WIOA participants who are engaged in training or education leading to a recognized post-secondary credential or certificate during a program year. Specifically, MSG focuses on participants who are achieving documented academic, technical, occupational, or other forms of progress toward obtaining a credential or employment. It acknowledges the tangible skills and knowledge gained by individuals as they advance through their educational or training journey. In summary, MSG provides insight into the skill development of program participants, emphasizing their growth and readiness for the workforce. It's a valuable measure for assessing the effectiveness of workforce development programs in preparing individuals for meaningful employment opportunities.

These indicators help assess the effectiveness of workforce development programs in achieving positive outcomes for individuals served by the system's core programs.

From the perspective of building the workforce system from the grassroots level, assessing the impact of the workforce development system and understand the perception of stakeholders, the Kentucky Workforce Innovation Board (KWIB) conducted a statewide listening tour in preparation of the 2024 WIOA State Plan. From July through the end of October 2023, all ten Kentucky Local Workforce Development Areas (LWDA) contributed to the work.

The framework for the tour involved working with the local LWDA Board directors and their teams to invite workforce stakeholders to conduct a brief overview of the purpose of the WIOA State Plan and breakout into focus groups to gain insight into specific perspectives. The focus groups were broken into:

- Workforce Partners (community-based organizations, nonprofits, MOU partners, educators)
- Employers
- Elected Officials
- Individual Customers

In total, 33 focus groups were held that involved 348 participants in the listening tours with the breakdown of: 198 workforce partners, 82 employers, 51 elected officials, and 17 individual customers contributing their perspective.

The main line of questioning proposed to each group was a reflection on the existing workforce development system and a reimagined future state of workforce development, with the main intention of learning best practices, challenges, and opportunities that can be pursued. The following findings were shared which align closely to the four strategic goals of the commonwealth:

1. Youth Employment - the Future of Workforce

- The most cited point and critically important point of continuous "exposure to careers" and opportunities for work-based learning
- A key point of career exposure was also to involve parents and teachers in understanding all options available in the world of work
- Ensuring that the workforce system reaches youth before they become "opportunity youth"
- Lack of mentors and mentorship programs leads to disengaged youth
- The value of essential skills and work ethic is critical

2. Hiring and Supporting Non-Traditional Talent / Workers (Untapped Talent)

- The most cited talent group was formerly incarcerated as several statewide and locally run programs are actively engaged in employment services
- Kentucky has a high number of individuals with disabilities with many employment programs that can be braided and leveraged
- English language learners, refugees, and immigrants
- Veterans/Military
- The aging population provides the benefits of higher retention

3. Business Engagement & Industry Innovation

- Importance of businesses being an engaged partner; being an active voice at the table
- The workforce system must emphasize support for small and medium-sized companies
- Employer investment in work-based learning/on-the-job training is critical
- Employer time is limited; using webinars, blogs, and direct communication to share resources
- Businesses are interested in actively engaging with other businesses, starting organic sector partnerships, opportunities to collaborate on sector training, employee support systems (sector-operated childcare center)
- Support to county and municipal government as an employer as competition has created hard-to-fill local government jobs: emergency response, road department, sewer and water, etc.
- Businesses are facing succession planning as retirements grow; looking at apprenticeship as a knowledge-sharing program is building momentum

- Supporting the recovery population in an ongoing basis through resources (or peer support specialists)

4. Enhanced Collaboration within Workforce and with Education

- Enhanced flexibility and partnership between education and workforce; lines need to be blurred
- Communication among workforce partners to raise awareness of available programs for businesses
- Continuous education to combat the perception of the Kentucky Career Center as the "unemployment office"
- Educational continuum needs to be embraced, "K through Gray" or "Cradle to Grave" as individuals become lifelong learners
- Reduced WIOA funding impact on local area providers; collaboration and braiding of funding and services is a necessity; collaboration also balances out duplication of services
- Addressing mental health impacts on over-burdened service providers
- Co-location of multiple partners in one physical space provides best services; while at the same time, rethinking brick and mortar locations; meeting customers where they are
- Ongoing staff training and exposure to the greater Kentucky workforce system

Funding to meet necessary activities can be directed as appropriate to the respective agencies with DWD, while agencies outside of ELC can be engaged to provide supportive or braided funding to accomplish a given activity. Further, the allocation set aside by WIOA for the Governor's discretionary fund, known as the Kentucky Statewide Reserve Fund, is divided into three primary categories of investment:

- Local innovation: allocated to innovative workforce development projects on the local or regional level
- Local implementation of the Governor's priorities
- State investment in the Governor's priorities (including on-going state transformational projects)

Furthermore, the Department of Workforce Development (DWD) intends to procure an assessment and evaluation of the effectiveness of services across the core programs to ensure a deeper and ongoing assessment and evaluation.

C. EVALUATION

Describe how the State will conduct evaluations and research projects of activities carried out in the State 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 (WIOA Section 116(e)).

The Department of Workforce Development (DWD) goal is to procure an assessment and evaluation of the effectiveness of services across the core programs. DWD will work with all core partners and Combined State Plan partners to coordinate this effort to gather a holistic and comprehensive evaluation of the entire system.

The evaluation will be led by the DWD, which encompasses the core programs and combined state plan partners. It would also work in conjunction with local workforce development boards to incorporate effectiveness in services across the core programs through the updated One-Stop Certification process. The steps would involve:

1. Development of the One Stop Certification application packet for comprehensive, affiliate, and access point centers, including the options for utilizing the hybrid service delivery model.
2. Organize and execute an orientation for the One Stop Certification application and review process for state and local stakeholders.
3. The design and facilitation of a One Stop Certification reviewer certification program for state and local review team members.

The timeframe for execution is to have an RFP prepared for release by August 2024 and the selection and commencement of the work by November 2024. The goal of the evaluation proposed by DWD is to complement the study below with information from federally funded workforce development programs.

In accordance with Kentucky HB 1 passed during the 2022 legislative session, Kentucky is to collaborate with the Center for Business and Economic Research (CBER) at the University of Kentucky to study the effectiveness of Kentucky's state-sponsored workforce development programs. A memorandum of agreement establishes the scope of the study and identifies the deliverables.

For each program selected, the Department of Workforce Development (DWD), in conjunction with the Kentucky Center for Statistics ("KYSTATS") will provide CBER with the following:

- statutory and regulatory references related to the programs
- access to personnel who administer the workforce development programs and deliver services
- revenues by funding source and fiscal year
- expenditures by category and fiscal year

The DWD, through KYSTATS, may also provide CBER access to available de-identified data on individuals who applied to or participated in the relevant program. The data may include dates when

individuals applied to, entered, completed, or left the program; demographics such as age, race, education, and gender; screening criteria; training and other services received; and county of residence. The DWD may also provide authorized CBER staff with access to data extracts from the Kentucky Longitudinal Data.

The system can be done through the KYSTATS or other means as deemed appropriate. CBER acknowledges and agrees that the performance of its duties under this agreement may involve a need to access and review confidential information (i.e., information designated as confidential by FERPA, NSLA, CNA, KRS 61.931(6), or other federal or state law), and that its employees and representatives are required to maintain confidentiality of this information and prevent any re-disclosure. In order to access this confidential data, CBER agrees that each of its employees with access will execute KYSTATS standard Contractor's Employee or Contractor Nondisclosure Statement.

The objectives for the above-described study are as follows:

Objective 1: Describe the Workforce Development Programs

CBER will review the statutory and regulatory requirements, interview program personnel, and examine program data to describe the select programs. This review will discuss the goals and target population of the programs and the types of services the programs provide. CBER will examine the trends in applications, participation, and completion associated with each program. Finally, CBER will analyze the expenditures associated with these programs to describe the types of expenditures incurred, the trends in providing these programs, and how program costs change with the number of people participating in the programs.

Objective 2: Evaluate the Labor Market Outcomes

Workforce development programs are designed with the goal of improving labor market outcomes for those who participate. Under this objective, CBER will examine the degree to which participation in the selected workforce development programs affects employment and earnings. CBER will begin this analysis by reviewing relevant research, including evaluations of similar programs in other states. While states often provide similar services, these services may differ in the intensity of training provided or the population targeted. These differences could contribute to different effects on the labor market. This review will provide valuable information about what does and does not work in other states and could provide a better understanding of the characteristics of a successful workforce development program.

CBER will develop a quasi-experimental research design to measure how Kentucky's workforce development programs affect labor market outcomes for individuals during and after participating in the programs. In quasi-experimental research designs, researchers compare outcomes for a treatment and control group. The treatment groups will consist of those who participated in the programs. The control groups will consist of people who have similar observable characteristics as those who received the treatment but who don't participate in the program. This minimizes the chances that differences in outcomes are due to differences in who chooses to participate in the program. When control groups are selected carefully, quasi-experimental research designs can provide strong validities. They will develop

statistical models to measure employment and earnings differences between the treatment and control groups while accounting for other factors that could affect labor market outcomes. This will provide an estimate of the programs' effects.

A separate analysis will be conducted for each program selected for evaluation. CBER will examine labor market outcomes while individuals are participating in the programs and for a period after they leave. By evaluating labor market outcomes while individuals participate, CBER will be able to determine whether workers incur some cost of participating in the form of lost wages. Participating in a program may provide workers an initial boost in employment and earnings relative to their peers who did not participate. However, these effects might decline over time. To address this issue, CBER will examine whether the differences in labor market outcomes change over time. The length of time evaluated after participants leave the program will depend on data availability. CBER will also estimate how effects differ by the type of program, such as short-term programs designed to help workers find a job relatively quickly versus long-term programs designed to increase worker's skills.

Finally, CBER will examine whether the effects of Kentucky's programs on the labor market differ across demographic groups. Many of Kentucky's residents face different barriers or challenges to working and earning wages. As a result, the effects of the labor market might differ for different groups of people, and different types of programs may provide different benefits for different demographic groups.

Objective 3: Evaluate the Potential Fiscal Impacts

By improving labor market outcomes, an effective workforce development program can reduce reliance on government assistance programs and increase tax revenue. CBER will use similar research methods as described in Objective 2 to evaluate the degree to which participating in the selected workforce development programs affects benefits received through programs such as unemployment insurance, TANF, or Medicaid. By reducing the reliance on these types of assistance programs, workforce development might achieve cost reductions for federal and state governments. This analysis will be contingent on the availability of data from these programs. To the extent that participating in workforce development programs improves labor market outcomes, the programs might also increase tax revenue. The impact on tax revenue will depend in part on labor market conditions and whether participants displace existing workers or affect the wages of existing workers. CBER will estimate how higher earnings could potentially affect the state's sales and individual income taxes.

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)

Per Policy 23-003 (https://kwib.ky.gov/WIOA%20Planning%20and%20Policy/Pages/default.aspx)

Title I Formula Allocation Methodology, the allocation of Youth activities funds to LWDAs, DWD may use either the allocation formula described in WIOA Section 128(b)(2) or the discretionary allocation formula in WIOA Section 128(b)(3).

A. Allocation Formula: Thirty-three and one-third % (33 1/3%) of the total funds available for local allocations are allocated based on each LWDA's relative share of each data factor listed below:

- The relative number of unemployed individuals in Areas of Substantial Unemployment (ASUs) in each LWDA, compared to the total number of unemployed individuals in ASUs in all LWDAs in the state.
- The relative excess number of unemployed individuals in each LWDA, compared to the total excess number of unemployed individuals in all LWDAs in the state. See the definition of "excess number" below, which requires a comparison of the excess unemployed in ASUs with excess unemployed in all LWDAs.
- The relative number of disadvantaged youth (age 16 to 21, excluding college students not in the workforce and military), in each LWDA, compared to the total number of disadvantaged youth in all LWDAs in the state. The number of disadvantaged youth comes from special tabulations of data from the ACS prepared in accordance with the definition provided in WIOA.

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

In allocating Adult Activities funds to LWDAs, DWD may use either the allocation formula described in WIOA Section 133(b)(2)(A) or the discretionary allocation formula in WIOA Section 133(b)(3).

A. Allocation Formula: The adult formula allocations are based on the same factors used in youth formula allocations except for disadvantaged adults aged 22 to 72, which are based on Low Income.

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

In allocating Dislocated Worker Activities funds to local areas, DWD will distribute Dislocated Worker Activities funds among local workforce areas (subject to the Governor's reservation of up to twenty-five % [25%] for statewide Rapid Response activities).

Allocation Formula: Under WIOA, the data factors that must be included are:

- Insured unemployment data;
- Unemployment concentrations;

- Plant closure and mass layoff data;
- Declining industries data;
- Farmer-rancher economic hardship data; and
- Long-term unemployment data.

Kentucky assigns a zero weight for plant closings and layoffs due to unreliable data, and the Bureau of Labor Statistics no longer produces this information nationwide. The farmer-rancher economic hardship data factor is based on the designation of Significant Migrant Seasonal Farm Worker (MSFW) State, Significant MSFW One-Stop Center (now branded as Kentucky Career Centers [KCCs]), and Significant Multilingual MSFW One-Stop Centers, in accordance with the number of MSFWs who participate or are estimated to be available to participate in the employment services provided in those states and through those One-Stop Centers.

WIOA Title I formula allotment methodologies and/or weights will be reviewed before communicating the coming program year local area allotments. Subsequently, a recommendation will be prepared as an agenda item at a regularly scheduled or special Kentucky Workforce Innovation Board (KWIB) meeting for review and approval of proposed allotment methodologies and/or weights. If the KWIB does not adopt the proposed allotment and/or weights, the preceding program year methodologies and/or weights will remain in effect.

In response to an emergency or disaster (i.e., large, unexpected layoff event causing significant job losses) DWD's Office of the Kentucky Workforce Innovation Board website (shall have discretionary Authority, with the written approval of the DWD Commissioner, to propose and adjust allotment methodologies and/or weights to remedy such emergent activities.

Title 1 program policy for distribution of funds can be found in policy 23-001 located on our state workforce development board site (https://kwib.ky.gov) ; Additional guidance on allowable costs and financial reporting requirements of funds are also available on that site.

B. FOR TITLE II

I. DESCRIBE THE METHODS AND FACTORS THE ELIGIBLE AGENCY WILL USE TO DISTRIBUTE TITLE II FUNDS.

The Office of Adult Education distributes Title II funds consistent with the model and metrics used by the US Department of Education, Office of Career, Technical, and Adult Education (OCTAE) to distribute AEFLA funds to the eligible agencies/states. The OAE uses the American Community Survey (ACS) data regarding working-age adults in Kentucky who do not possess a secondary diploma, or it's recognized equivalent, which is the GED in Kentucky. The ACS data across the 120 counties in Kentucky is utilized to determine the amount of funding each eligible provider per WIOA Section 203 (5) receives for a particular performance year. The 25 eligible providers, who submitted applications and were subsequently deemed eligible to receive funds through the 2026 -2028 competitive Request for

Applications (RFA) process, are awarded funds based on the eligible individuals per the ACS data in the counties within their respective service areas. This funding model applies to funds related to Sections 231 and 225 as well as Section 243 of WIOA. ACS data for English language learners (ELLs) within the counties across the eligible provider's service area is used for eligible providers awarded Section 243 funds via the 2026-2028 competitive RFA process.

The OAE maintains the flexibility based on the availability of funds and Kentucky Education and Labor Cabinet Fiscal Management Office approval to implement a performance funding model that distributes 95% of the eligible provider's allotted budget per ACS data each performance year and based on meeting certain performance requirements annotated in the Kentucky Adult Education Program Manual (PM), eligible providers can earn the additional 5% of their total budget.

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.

Direct and equitable access Section III(b)5.B.(ii)]: All KYAE 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 % and a maximum of 75 % 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.

Describe data-collection and reporting processes used for all programs and activities, including the State's process to collect and report data on co-enrollment, and for those present in the one-stop centers.

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

The Kentucky Center for Statistics (KYSTATS) collects and links data to evaluate education and workforce efforts in the Commonwealth, including developing reports, responding to research requests, and providing statistical data about these efforts so policymakers, practitioners, and the general public can make better informed decisions. KYSTATS is within the Education and Labor Cabinet and works closely with the agencies with the Department of Workforce Development. Through the intuitive dashboards based on core program data, KYSTATS is able to provide information on all Combined State Plan partners in addition to other cabinet agencies that serve individuals that may also cross paths with Title I-IV programs and WIOA State Plan partners. The dashboard can include formerly incarcerated population that received training and then entered a registered apprenticeship program – such interoperable data points provide the foundation for career pathways, co-enrollment, and overall better decision-making.

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 dedicated to improving workforce development by integrating data systems into its WIOA state plan. KEE suite, one of several WIOA systems, is vital for managing citizen interactions and case management and is central to this initiative. The goals include creating a unified data framework for streamlined intake and tracking across programs, enhancing service delivery for job seekers and employers. Planned actions involve assessing current systems, fostering collaboration among agencies,

exploring modern technology solutions, and initiating pilot programs to test integration strategies. Privacy and security of participant data will be prioritized, ensuring compliance with regulations. The integration process will span three years, focusing on stakeholder engagement to inform implementation and ultimately enhancing workforce program effectiveness and accessibility for Kentuckians.

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 Department of Workforce Development will be procuring a new Case Management System. The state workforce board, Kentucky Workforce Innovation Board (KWIB) will assist in the Request for Proposal (RFP) creation to ensure that the system is aligned with the strategic goals and objectives to the board's vision.

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

The Kentucky Career Centers utilize the Kentucky Engagement Enterprise Suite (KEE Suite), a specialized Customer Relationship Management (CRM) system designed to manage and support workforce development programs. KEE Suite streamlines communication for staff, employers, and training providers while ensuring oversight, compliance, and security of programs. Continuously working to adopt new technologies and updates to enhance program efficiency and effectiveness, KEE Suite features three integrated portals:

- Citizen Connect-Provides individuals with access to workforce activities, services, and available training opportunities.

- Business Connect-Enables individuals to find job openings, WIOA-eligible trainings, and local workforce development programs.

- Staff Connect-Supports case managers in registering individuals, conducting assessments, determining eligibility, creating employment plans, managing cases, and assigning services.

By centralizing data, automating processes, and offering tracking, KEE Suite supports workforce development. Committed to evolving with Kentucky's workforce, it provides a flexible, scalable foundation. Regular updates and the adoption of new technology keep the KEE Suite innovative for supporting our ongoing economic growth. Locally, KEE Suites is the system of choice to produce reports required under section 116. The Kentucky Integrated Business Engagement System (KIBES) is utilized to track engagement with employers.

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.

Currently utilizing KEE Suite, the system tracks monthly/quarterly progress including whether additional services are needed, employment data, post-secondary education, service satisfaction, and employment satisfaction. This data can be cross-referenced to see the impact of attaining credentials, participating in work-based Learning, and/or achieving measurable skills gains.

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 records are utilized in performance accountability by matching those records to customers and participants who have been served by WIOA, Adult Education, Wagner Peyser, and OVR. They are matched to see who is employed in both the 2nd quarter and 4th quarter after exit. In addition, they are utilized in the Median Earnings calculation.

D. PRIVACY SAFEGUARDS

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

The Education and Labor Cabinet (ELC) and Commonwealth Office of Technology (COT) use the National Institute of Standards and Technology (NIST) 800-53 list of controls to support the development, security and privacy of the systems used to process, store, transmit and access information. Following these standards ensures the confidentiality, integrity and availability of the information necessary to carry out the functions of the Cabinet.

NIST standards require the Cabinet to categorize information based on its level of confidentiality, potential impact to personal information if a breach occurred and the importance of data availability. Data is then secured based on these categories. Additionally, these categories are used to apply privacy controls, complete assessments, and provide disaster recovery support.

Access to systems is limited and only granted through a controlled process. Requests for access must be submitted by a manager and are reviewed by the Office of Information Technology. Once access is approved, ELC works with COT to grant access to all users through a unique username and password. Further, physical security controls are also in place to ensure the privacy of

information. Only authorized staff are allowed within the secured areas unless escorted by authorized staff.

ELC must maintain detailed system security and privacy plans that include information on the enterprise architecture, describe the controls in place to meet the NIST standards, describe threats and how the agency plans to overcome those, and activities affecting the system that require planning and coordination. These documents are sensitive in nature and maintained within the agency to safeguard the integrity of the system.

Finally, annual audits are performed by several agencies, including the Commonwealth of Kentucky Auditor of Public Accounts that focus on application security measures and data protection.

7. PRIORITY OF SERVICE FOR VETERANS.

A. DESCRIBE HOW THE STATE WILL IMPLEMENT THE PRIORITY OF SERVICE PROVISIONS FOR COVERED PERSONS 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.

B. DESCRIBE HOW THE STATE WILL MONITOR PRIORITY OF SERVICE PROVISIONS FOR VETERANS.

C. DESCRIBE THE TRIAGE AND REFERRAL PROCESS FOR ELIGIBLE VETERANS AND OTHER POPULATIONS DETERMINED ELIGIBLE TO RECEIVE SERVICES FROM THE JOBS FOR VETERANS STATE GRANTS (JVSG) PROGRAM'S DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALIST/CONSOLIDATED POSITION.

A. Describe how the State will implement the priority of service provisions for covered persons 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.

The Commonwealth is committed to ensuring that veterans continue to receive speedy and priority services. Recent measures have been taken to update and expand consistency in all facets of program delivery, including the standardization of protocols and procedures to continually provide model program delivery.

"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.

In accordance with guidance provided under TEGL 10-09 and VPL 07-09, Veterans and eligible spouses, including widows and widowers as defined in the statute and regulations, are eligible for priority of service. For the purposes of implementing priority of service, the Final Rule requires that program operators use the broad definition of veteran found in 38 U.S.C. 101(2). Under this definition, the term "veteran" 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, as specified in 38 U.S.C. 101(2). Active service includes full-time Federal service in the National Guard or a Reserve component. This definition of "active service" does not include full-time duty performed strictly for training purposes (i.e., that which often is referred to as "weekend" or "annual" training), nor does it include full-time active duty performed by National Guard personnel who are mobilized by State rather than Federal authorities (State mobilizations usually occur in response to events such as natural disasters).

"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:

a. Any veteran who died of a service-connected disability;

b. 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:

i. Missing in action;

ii. Captured in line of duty by a hostile force; or

iii. Forcibly detained or interned in line of duty by a foreign government or power;

c. Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs, or

d. Any veteran who died while a disability was in existence. A spouse whose eligibility is derived from a living veteran or service member (i.e., categories b. or c. above) would lose their eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g., if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

The priority of service regulations refers to those veterans and spouses who are eligible for priority of service as "covered persons" and refer to those not eligible for priority of service as "non-covered persons." In the interest of specificity, this guidance refers to those eligible as "veterans and eligible spouses." However, in the interest of brevity, this guidance also adopts the regulatory terminology by referring to those who are not eligible as "non-covered persons."

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, the 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 the priority of service requires a veteran or other eligible to go to 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 of 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 the priority of services;
- The full array of employment, training and placement services available; and
- Applicable eligibility requirements for programs and services.

Procedure to Implement Priority of Service Provisions:

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

B. Describe how the state will monitor priority of service provisions for veterans.

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 data generated 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 & Labor Cabinet.

C. Describe the triage and referral process for eligible veterans and other populations determined eligible to receive services from the Jobs for Veterans State Grants (JVSG) program's Disabled Veterans' Outreach Program (DVOP) specialist/Consolidated Position.

Disabled Veterans' Outreach Program (DVOP) specialist/Consolidated Triage and Referral Process:

The Intake Staff at the Kentucky Career Centers are the first points of contact and will identify eligible veterans, eligible spouses, or other family members who indicate they are caregivers of such wounded, ill, or injured members. 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 5-24. When filling out the Veteran Information Form:

1. Answering "yes" to any of the questions in the section. Qualifying Employment Barriers (QEB) would indicate that the veteran is eligible for DVOP services or eligible spouses or other family who indicate they are caregivers of such wounded, ill, or injured members.
2. In the section 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 who is within the guidelines indicates that they may be eligible for DVOP services.

The Intake Staff determines if the individual meets the criteria and eligibility requirements for DVOP services. Those who 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.

Qualifying Employment Barriers (QEB) as outlined by VPL 05-24:

a. Has a disability, which may include any of the following:

i. Special disabled veteran, defined in 38 U.S.C. § 4211(1) as a veteran who is 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 for a disability rated at 30 % or more, or rated at 10 or 20 % in the case of a veteran who has been determined to have a serious employment handicap; or person who was discharged or released from active duty because of a service-connected disability.

ii. Disabled veteran, defined in 38 U.S.C. § 4211(3) as a veteran who is 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 a person who was discharged or released from active duty because of a service-connected disability.

iii. Other disability. Eligible veterans and eligible persons who self-identify as having a disability, as defined by the Americans with Disabilities Act, 42 U.S.C. § 12102.

b. Is a Vietnam-era veteran, as defined by 38 U.S.C. § 4211(2) as an eligible veteran any part of whose active military, naval, or air service was during the Vietnam era, as defined by 38 U.S.C. § 101(29).

c. Is a recently separated veteran, defined in 38 U.S.C. § 4211(6) as a veteran who was discharged or released from active duty within the last three years.

d. Has been referred for employment services by a representative of the Department of Veterans Affairs.

e. Is experiencing homelessness, as defined in Sections 103(a) and (b) of the McKinney Vento Homeless Assistance Act (42 U.S.C. § 11302(a) and (b)).

f. Is justice-involved, as defined in WIOA Section 3(38), 29 U.S.C. § 3102(38) (definition of “offender”).

g. Is between the ages of 18–24 years of age at the time of enrollment.

h. Is educationally disadvantaged, meaning that the individual lacks a high

school diploma or equivalent certificate.

i. Is economically disadvantaged, which means any of the following:

i. Meets the definition of a low-income individual in WIOA Section 3(36), 29 U.S.C. § 3102(36).

ii. Unemployed.

iii. Heads of single-parent households containing at least one dependent child.

Additional Populations.

a. Transitioning Service Members (TSM) who, at the time of enrollment have participated in any part of the Transition Assistance Program, including self-paced online modules and Individualized Initial Counseling.

b. Wounded, ill, or injured members of the Armed Forces who are receiving treatment in military treatment facilities or warrior transition units.

c. Spouses or other family caregivers of those wounded, ill, or injured service members.

Again, eligible veterans and eligible spouses who are determined to have a qualifying employment barrier 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 QEB through the registration process. As part of the registration/assessment process (to be completed by the Wagner-Peyser (WP) staff), the WP staff will upload the Veteran Information Form into the veterans' electronic record and create a JVSG Referral for all eligible veterans. The JSVG staff will receive a report notifying them of the referral. The DVOP will be expected to review all the forms and enter a "DVOP Specialist" activity for all those who qualify for services and begin case management. For veterans who do not qualify, a case note explaining why must be entered.

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.) regarding 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.

The Department of Workforce Development will continue to comply with Section 188 of WIOA and applicable provisions of the American with Disabilities Act of 1990 so that all individuals with disabilities can fully utilize services and resources to obtain competitive integrated employment. As a

priority, accessibility is addressed at every level and through venues in the Kentucky Career Center (KCC). The KCC offices provide both physical and programmatic accessibility to facilities, programs, services, technology and materials.

The Office of Vocational Rehabilitation (OVR), a partner agency, has counselors for both general and blind services, deaf and hard of hearing and other staff housed at KCC locations and for this reason, staff has a heightened sense of assuring that the service and accessibility needs of individuals with disabilities are met. The Education and Labor Cabinet, Office of Communications has a staff person who is dedicated to ensuring all communications for the Cabinet are in an accessible format. In addition, OVR has a dedicated staff member who serves as the gatekeeper for all written, internal, and external communications to ensure documents reach individuals with disabilities in an accessible format. All staff are required to have documents reviewed for accessibility by the designated staff before distributing to provide statewide resources to ensure compliance.

Each KCC office:

- Is fully ADA compliant;
- Is accessible (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.);
- Provides assistive technology to assist customers with disabilities (visual, hearing and physical) so they can access computers and other KCC resources/services;
- Evaluates assistive technology annually to ensure it is up-to-date and fully functioning;
- Provides free parking and inclusive parking spaces that are adequate for the average level of customer traffic, especially for individuals with disabilities; and
- Makes services accessible to customers who have language and literacy barriers (non—English speakers or individuals with hearing impairments, disabilities, or literacy/reading barriers).

All KCC 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 agency staff regardless of race, color, national origin, sex, sexual orientation, gender identity or age. 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.

The Department of Workforce Development 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.

This is further strengthened by Guidance #20-001 titled, “Kentucky Career Center One Stop Certification,” which outlines the following steps for the One-Stop Certification Process, including specific reference to ADA compliance:

Step 1: The One-Stop Operator (OSO) completes the application for the appropriate type of center certification: comprehensive, Affiliate, or Access Point.

Step 2: For the Comprehensive and Affiliates, the OSO obtains the following documents: 1) MOU/IFA, 2) American Disabilities Act (ADA) Compliance Letter, and 3) Staff Development Plan. Access Points will only need to submit an ADA Compliance Letter. It is recommended that all Access Points be ADA Compliant.

Step 3: The OSO submits to the LWDB a letter of request to continue the certification process along with the appropriate application and the three documents listed in Step 2. Access Points will only need to submit an ADA Compliance Letter. Again, it is highly recommended that all Access Points be ADA Compliant.

Step 4: For Comprehensive and Affiliate sites, the LWDB chooses a minimum of a 4-member review team. The review team must consist of at least one business representative from the LWDA (a non-board member), one LWDB member from another LWDA, one non-core partnering entity not located at the center site, and a LWDB member from the same LWDA. Access Point review teams must consist of a minimum of two, which must include the LWDB Director or their designee and an LWDB member from the same LWDA. Any additional review team members the LWDA would like to include should be chosen from one of the following: one business representative from the LWDA (a non-board member), one LWDB member from another LWDA, and one non-core partnering entity not located at the center site and a LWDB member from the same LWDA.

Step 5: An LWDB member will pull the team together. The group will choose a team leader and conduct an orientation provided by the KWIB. The orientation outlines the team's responsibilities and the process for career center certification reviews.

Step 6: The Review team selects the date for the on-site center review.

Step 7: Of the four categories on the Comprehensive or Affiliate application, each team member must select one category from the following: 1) Business/Employers Services, 2) Job Seeker Services, 3) Center Management, and 4) Strategic Planning/Innovation. The review team should examine all categories and questions before and during the site visit. For the Access Point sites, review the entire application as well.

Step 8: The review team conducts the review and then meets with the OSO and key career center staff for additional questions/discussion.

Step 9: After the review, the Review team will only have a final meeting on-site to prepare a letter to the LWDB with all findings, suggestions, and recommendations, including best practices, addressed to the Chair of the Board. Finalization of the letter incorporating all team members' comments and signatures

can be completed electronically (i.e., by email). The letter should state whether the team's recommendation is to grant Certification, not grant certification, or conditionally grant Certification to the career center. Suppose the LWDB determines that Certification is denied or granted conditionally. In that case, specific findings and required actions must be included in the correspondence with deadlines and/or a corrective action plan that requires full compliance prior to any further steps being taken. The letter template from Review Team to LWDB is available on KWIB website via https://kwib.ky.gov/Pages/One-Stop-Certification.aspx.

Step 10: The Review team leader presents the team's recommendation in person or using technology (e.g., Zoom) to the LWDB, after which the Board makes its final determination.

Step 11: The LWDA Board will then send a letter with the Board's decision to the KWIB. With the LWDA Board letter (including an action plan to remedy unresolved ADA issues at the site, if any), attach the Certification application, Staff Development Plan, ADA Compliance letter, and the Review team's recommendation letter to the LWDB. Letter template from LWDB to KWIB is available on the KWIB website via https://kwib.ky.gov/Pages/One-Stop-Certification.aspx.

Step 12: The Executive Director of the KWIB presents all certifications to the KWIB. At this time, the KWIB issues a Certificate of Recognition to each LWDB for all approved career center certifications in that LWDA.

Step 13: Each center site must recertify at least every three years with no lapse between Certifications. It is recommended that the Certification process begins at least six months before the current Certification expiration date.

Step 14: If a new site is designated in a LWDA, the LWDB must notify the KWIB within 30 days of opening the center. The new site should be Certified ADA-compliant within the first month of opening. (if not before the opening). The One Stop Certification process should begin within the first three months of opening and be fully Certified within 6-9 months of the opening date.

Kentucky is also able to leverage the work of broadband expansion by allowing core program staff, Combined State Plan partners and the workforce system to be able to access Kentucky's map of targeted populations switch utilizes the census data to depict the locations for:

- Individuals who live in low-income households
- Aging individuals
- Formerly incarcerated individuals
- Veterans
- Individuals with disabilities
- Individuals with a language barrier

- Individuals who are members of a racial or ethnic minority
- Individuals who primarily reside in a rural area

This information is useful in serving individuals with employment barriers and targeting specific regions for maximum service impact.

Finally, individuals with disabilities are further served through the Kentucky Assistive Technology Service (KATS) Network, and its mission is to make assistive technology (AT) information, devices, and services easily obtainable for people of any age and/or disability. AT is any item or piece of equipment (both low-tech and high-tech) used to improve and/or maintain independence in the home, at work, school, or play.

The KATS Network provides access to AT through a network of Regional AT Resource Centers (ATRCs) across the state. The Regional ATRCs operate AT demonstration programs, lending libraries, and AT reutilization programs. The KATS Network Coordinating Center and each of the ATRCs work cooperatively to provide outreach, information & assistance services, and training on various AT topics. Technical assistance and collaboration is also provided to state agencies and organizations to enhance the understanding of and access to AT and accessible information technology (IT).

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. Describe how English language learners will be made aware of the opportunity to enroll and/or co-enroll in all the core programs for which they are eligible.

English language learners are provided services from core programs, Combined State Plan partners, and the workforce system, which utilize InterpreTalk statewide. At the fundamental level, English language learners are always offered the option to utilize language line services to help communicate through an interpreter. Through engagement, individuals are encouraged and made aware of opportunities to enroll and co-enroll in core programs.

Staff are guided on how to request InterpreTalk services. Additionally, the Career Development Office (CDO) provides staff with an “Interpretation Services Available” guide that an ELL can point to for the staff to determine what the target language is and be able to contact the correct InterpreTalk language service.

Furthermore, in communities where there are more English language learners, local delivery leans on the workforce system partners that incorporate services across the totality of the populations they serve which includes the international population and English language learners. Direct partnerships with

resettlement agencies are encouraged to increase opportunities for individuals seeking services across the core programs.

Additionally, Kentucky is also able to leverage the work of broadband expansion by allowing core program staff, Combined State Plan partners, and the workforce system to be able to access Kentucky's map of targeted populations switch utilizes the census data to depict the locations for:

- Individuals who live in low-income households
- Aging individuals
- Formerly incarcerated individuals
- Veterans
- Individuals with disabilities
- Individuals with a language barrier
- Individuals who are members of a racial or ethnic minority
- Individuals who primarily reside in a rural area

English language learners are a population pool included in the strategy of expanding online targeted-sector training in alignment with Kentucky's economic and workforce development goals, plans, and outcomes. Specifically, the integration of digital literacy skill development into reading, math, and English language instruction for adults through Kentucky Adult Education courses. Kentucky Adult Education currently includes digital upskilling as a component of all Integrated Education and Training (IET) and Workplace Literacy programs.

In Kentucky, adhering to the Adult Priority of Service requirement in WIOA section 134(c)(3)(E), which mandates that American Job Center staff prioritize recipients of public assistance, low-income individuals, and individuals who are basic skills deficient (including English language learners) when using WIOA Adult program funds for individualized career and training services, the Office of Employer and Apprenticeship Services, in collaboration with the ETPL Coordinator, is dedicated to a proactive and vigilant approach.

To effectively implement and monitor this priority of service requirements, we have devised a multifaceted strategy:

1. Training and Capacity Building: The Office of Employer and Apprenticeship Services and the ETPL Coordinator will collaborate closely with state and local Workforce Innovation Boards and local WIOA contractors. This partnership is instrumental in ensuring that front-line employees, including American Job Center staff, are well-informed and adequately trained on the requirements and nuances of the priority of service provisions. This training will equip them with

the knowledge and skills necessary to identify and provide specialized services to eligible individuals promptly.

2. Clear Guidelines and Procedures: We are committed to developing and providing clear and concise guidelines and procedures that outline how the priority of service should be implemented in practice. These guidelines will include detailed instructions on identifying eligible individuals and the specific services and support they are entitled to under WIOA. By disseminating this information throughout our workforce network, we ensure consistent and equitable service delivery.
3. Application Monitoring: The implementation of the Adult Priority of Service requirement also necessitates robust application monitoring processes. Our strategy includes training front-line staff and monitors to ensure that WIOA applications for services are not only processed efficiently but also filled out completely and accurately. This proactive approach helps in the accurate determination of eligibility and prevents inadvertent discrimination against eligible individuals.
4. Regular Audits and Compliance Checks: To maintain accountability and adherence to the priority of service requirements, we will conduct regular audits and compliance checks. This process includes periodic reviews of service delivery to verify that the priority individuals are receiving the support they are entitled to, as well as assessing the accuracy and completeness of application processes.
5. Feedback Mechanisms: We will establish mechanisms for feedback and reporting. Front-line staff, monitors, and clients will have channels through which they can report concerns or violations of the priority of service requirements. This feedback loop ensures that any issues are addressed promptly and that corrective actions are taken.

Kentucky recently conducted a competitive Request for Applications in early 2025 for the 1 July 2025 – 30 June 2028 Grant Cycle. As a result of the competition, seven Adult Education eligible applicants were awarded IELCE funding under Section 243: Bluegrass Community and Technical College; Jefferson County Public Schools; Southcentral Kentucky Community and Technical College; Newport Independent Schools, Jefferson Community and Technical College, West Kentucky Community and Technical College, and Gateway Community and Technical College. These applicants cover the following high-volume ELL Kentuckians: Fayette, Jefferson, and Warren counties, Norther Kentucky/Greater Cincinnati counties, and Paducah/McCracken County in the far west of the state.

In PY24, IELCE PROGRAMS SERVED 2,607 English Learner Students (ELLs), attaining 1,287 measurable skill gains (MSGs). All IELCE programs have access to Integrated Education and Training (IET) opportunities through both state and program specific partnerships with providers across the Commonwealth. Intentional and intense IET-specific training and IELCE guidance has been conducted with IELCE program directors and will continue in the future

For IELCE applicants of the RFA, separate forms are required describing the program's plan of service and indicate how resources would be allocated in the budget and budget narrative.

As a result of the monitoring process, Kentucky Adult Education (KYAE)will assess to ensure that all IELCE program components are fully integrated in those programs awarded IELCE funds as a result of the 2025 grant competition. KYAE will ensure that all IELCE award recipients adhere to the 13 Considerations via the monitoring and TA process which will include but not limited to periodic site visits as well as desktop assessments to determine execution of section 243 funds in accordance with 34 CFR 463 subpart C.

KYAE'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. The Revised English Language Proficiency Instructional Framework aligns with CASAS Life & Work and CLAS-E more explicitly with the ELP Standards in a streamlined and simplified format.

Currently, PAPC, using Office of Career, Technical, and Adult Education (OCTAE) resources, is conducting technical assistance sessions specifically targeting IELCE programs and Integrated Education and Training (IET) models.

KYAE is intentional in seeking guidance and assistance from the appropriate US DOE OCTAE Subject Matter Experts to gain greater levels of knowledge on all applicable requirements and guidelines. The goal is to continue attending training sessions and seeking guidance for requirements for current year activities and programs as well as set the conditions to move forward in the future.

IELCE program students will have access to partnership programs. KYAE has significantly increased access to IET/WPL partnerships via the IET/WPL Review Team and Planning Tool process. Kentucky has adopted a statewide IET/WPL process that leverages existing partnerships as well as provides the opportunity for local providers and other stakeholders within the workforce and training communities to develop new partnerships in support of the top five in-demand sectors in the Commonwealth.

KYAE has 25 local providers who offer programs designed to meet labor market needs and increase credential attainment for adults. KYAE leadership meets periodically with the Kentucky Department of Workforce Development (DWD) offices as well as the Kentucky Center for Statistics (KY STATS) and the Kentucky Council on Postsecondary Education (CPE) to discuss marketing strategies, enrollment trends, and student success outcomes.

KYAE continues to explore ways in which to partner with organizations to offer core adult education services concurrently with occupational skills training. At the same time, 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 KYAE Outreach and Strategic Partnerships Branch continues to engage 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. The reengagement is necessary as the totality of the circumstances of all eligible participants which includes the second/fair chance population, veterans/family members, and individuals aging out of the foster care system as well as the unhoused/homeless population requires a synchronized approach that aligned with the priorities of the Commonwealth of Kentucky.

KYAE periodically conducts internal assessments to ensure alignment with industry needs and emerging priorities across the Commonwealth. Based on these assessments, the mission essential tasks across KYAE to include Branch operations within the Office of Adult Education are shaped to better address student needs and emerging opportunities across in-demand careers in Kentucky. The new focus is multi-fold, which includes but not limited to the following: connecting and coordinating 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 in support of America's Talent Strategy: Building the Workforce for the Golden Age.

KYAE continually provides opportunities to connect local providers with local partners to enhance student access, support, and success.

Based on historical enrollment, KYAE is developing strategies to improve the referral process to increase referrals from employers, community agencies, and WIOA core partners per year. With the use of available resources, technical assistance, periodic monitoring, and offering additional trainings and workshops with our local partners, our IELCE providers will continue to help our state identify how to best align adult education activities with postsecondary, workforce, and local partner needs.

In conclusion, our approach to implementing and monitoring the Adult Priority of Service requirement in WIOA is comprehensive and focused on ensuring equitable access to services for the specified priority groups. Through training, clear guidelines, application monitoring, audits, and feedback mechanisms, we aim to create a system that not only adheres to federal regulations but also reflects our commitment to the welfare and development of all eligible individuals in our state. This approach ensures that the American Job Center staff provide tailored, supportive, and effective services to those who need them most.

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.

Through interagency touch points and continuous communication between agency leaders responsible for the State Planning process. Combined State Plan partners also played a critical role in the listening sessions conducted in the local areas.

The Kentucky Workforce Innovation Board (KWIB) conducted a statewide listening tour in preparation of the 2024 WIOA State Plan. From July through the end of October 2023, all ten Kentucky Local Workforce Development Areas (LWDA) contributed to the work.

The framework for the tour involved working with the local LWDA Board directors and their teams to invite workforce stakeholders to conduct a brief overview of the purpose of the WIOA State Plan and breakout into focus groups to gain insight into specific perspectives. The focus groups were broken into:

- Workforce Partners (community-based organizations, nonprofits, MOU partners, educators)
- Employers
- Elected Officials
- Individual Customers

In total, 33 focus groups were held that involved 348 participants in the listening tours with the breakdown of: 198 workforce partners, 82 employers, 51 elected officials, and 17 individual customers contributing their perspective.

The main line of questioning proposed to each group was a reflection on the existing workforce development system and a reimagined future state of workforce development, with the main intention of learning best practices, challenges, and opportunities that can be pursued.

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	Yes

The State Plan must include	Include
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;	
4. (a) The State obtained input into the development of the Unified or Combined State Plan and provided an opportunity for comment on the plan by representatives of local boards and chief elected officials, businesses, labor organizations, institutions of higher education, the entities responsible for planning or administrating the core programs, required one-stop partners and the other Combined Plan programs (if included in the State Plan), other primary stakeholders, including other organizations that provide services to individuals with barriers to employment, and the general public, and that the Unified or Combined State Plan is available and accessible to the general public; (b) The State provided an opportunity for review and comment on the plan by the State Board, including State agency official(s) for the Unemployment Insurance Agency if such official(s) is a member of the State Board;	Yes
5. The State has established, in accordance with WIOA section 116(i), fiscal control and fund accounting procedures that may be necessary to ensure the proper disbursement of, and accounting for, funds paid to the State through allotments made for the core programs to carry out workforce development activities;	Yes
6. The State has taken appropriate action to secure compliance with uniform administrative requirements in this Act, including that the State	Yes

The State Plan must include	Include
will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the uniform administrative requirements under WIOA section 184(a)(3);	
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

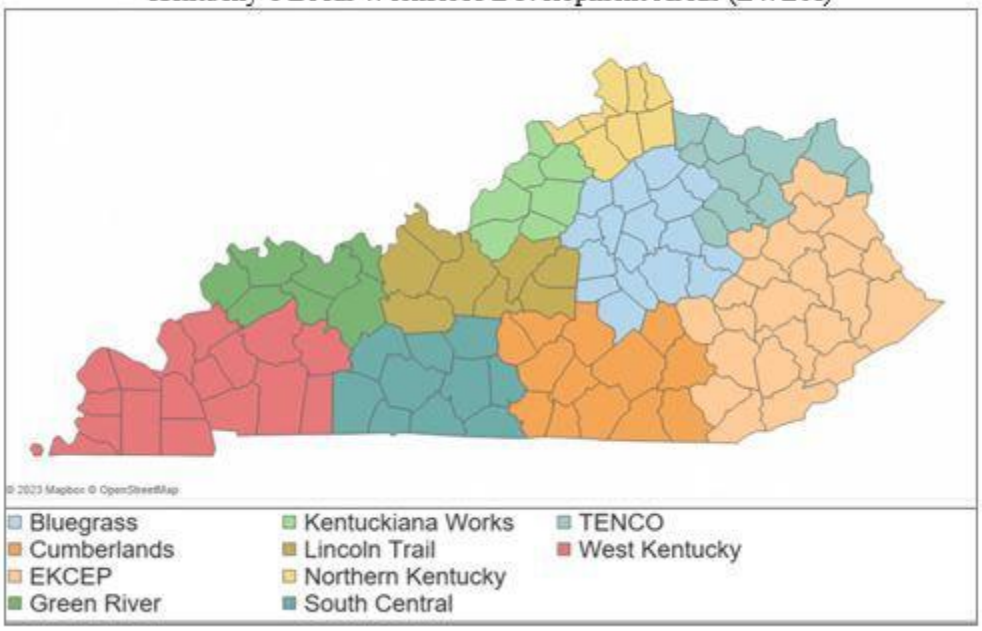
1. REGIONS AND LOCAL WORKFORCE DEVELOPMENT AREAS

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

Kentucky identifies five regions and ten (10) local workforce areas delivering services as related to WIOA. The five (5) workforce regions have been identified as:

- Central Region consists of the Northern Kentucky, Lincoln Trail and Bluegrass local workforce development areas.
- East Region consists of the Eastern Kentucky Concentrated Employment Program (EKCEP) and Ten County Area (TENCO) local workforce development areas.
- South Central Region consists of the South Central and Cumberlands local workforce development areas.
- West Region consists of the Green River and West Kentucky workforce development areas.
- Bi-State, consisting of Southern Indiana Works Workforce Board and KentuckianaWorks Workforce Area.

Figure 10
Kentucky's Local Workforce Development Areas (LWDA)



The ten (10) local workforce areas are:

- Bluegrass Local Workforce Area is 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 is composed of Adair, Casey, Clinton, Cumberland, Green, McCreary, Pulaski, Russell, Taylor, Rockcastle, Laurel, Whitley 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.
- KentuckianaWorks Workforce Area — Greater Louisville Local Workforce Area is composed of Jefferson, Bullitt, Henry, Oldham, Spencer, Shelby and Trimble counties.
- Green River Local Workforce Area is composed of Daviess, Hancock, Henderson, McLean, Ohio, Union and Webster counties.
- Lincoln Trail Local Workforce Area is composed of Breckinridge, Grayson, Hardin, Larue, Marion, Meade, Nelson and Washington counties.
- Northern Kentucky Local Workforce Area is composed of Boone, Campbell, Carroll, Gallatin, Grant, Kenton, Owen and Pendleton counties.

- South Central Local Workforce Area is composed of Barren, Hart, Metcalfe, Monroe, Allen, Butler, Edmon— son, Logan, Simpson and Warren counties.
- TENCO Local Workforce Area is composed of Bath, Boyd, Bracken, Fleming, Greenup, Lewis, Mason, Montgomery, Robertson and Rowan counties.
- Western Kentucky Local Workforce Area is composed of Ballard, Caldwell, Calloway, Carlisle, Christian, Crittenden, Fulton, Graves, Hickman, Hopkins, Livingston, Lyon, Marshall, McCracken, Muhlenberg, Todd and Trigg counties.

B. DESCRIBE THE PROCESS AND POLICY 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 (now Kentucky Workforce Innovation 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. It 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 has offered adequate time for public comment prior to the designation of the local workforce development area. It 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 (now the Department of Workforce Development) 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.

Additional language requested: to describe the procedures for determining whether the local area met the criteria for "performed successfully" and "sustained fiscal integrity"

Kentucky's policy for identifying Local Workforce Development Areas (LWDAs) is not just a bureaucratic process but a collaborative effort. It is a policy, number 15-004, that is initiated by a request to the Governor for the designation of a local area. A Steering Committee comprising diverse industry members drafts ideas for consideration. The Department of Workforce Development (DWD) then solicits local comments and holds a public discussion on these and other options. This policy gives the Governor, state board, major elected leaders, and impacted local boards a say. Public comment allows business, education, and labor organizations to weigh in before naming the local workforce development region. This collaborative approach ensures that all stakeholders have a voice in the process, making it more inclusive and effective.

In addition to the definitions provided by WIOA, the following are used to determine initial local area designations. 'Performed satisfactorily' means that the local area has met or exceeded the performance levels agreed upon with the local board and top elected officials. Furthermore, the local area has not failed any measures in the previous two program years prior to the implementation of WIOA. 'Sustained fiscal integrity' is a critical component of financial stability and prudent management. It is more than just a requirement; it is a commitment to effectively coordinating local workforce development operations. It instills security and trust in communities by allowing them to use State-allocated Adult, Dislocated Worker, and Youth funding. Kentucky takes this commitment seriously and monitors local regions annually for budgetary integrity and performance. This annual monitoring process is a testament to our commitment to accountability and responsibility. Success means the local region has reached or exceeded key indication thresholds for subsequent designation. The local Workforce Development Board (WDB) and Chief Elected Official collaborate on these metrics. The local region must meet or exceed the State Plan core indicator performance criteria.

According to Kentucky's definition of met or surpassed performance, the local area should not have failed any criterion in the previous two program years. Grant recipients and local governments must manage finances prudently to maintain budgetary integrity. There has been no formal determination that

funds were inappropriately used owing to purposeful disregard for limits. Kentucky should not have found any cash spent due to purposeful contempt of limits. A locality must maintain budgetary integrity to be certified again. Good financial management and budgeting are needed. The local government should have managed its funds transparently, accountable, and according to financial standards. For future designation, the local area must demonstrate financial stability and smart fund management and participate in regional planning. These criteria help local governments manage workforce development programs, align resources, and provide coordinated services to job seekers and businesses.

C. PROVIDE THE APPEALS PROCESS AND POLICY 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, 4th floor, Frankfort, Kentucky 40601 and the Department of Workforce Development, 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 AND POLICY 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

WIOA Planning and Policy Documents			
Category	**Document Type**	**Effective**	**Title**

WIOA Planning and Policy Documents			
AJC & WIOA	Policy	7/1/2015	15-001 WIOA Local Workforce Development Board Composition, Membership, Certification, and Functions (with attachments)
AJC & WIOA	Policy	11/1/2021	15-002 - Workforce Innovation and Opportunity Act - Interlocal Agreements, Chief Local Elected Official and Local Elected Official Roles and Responsibilities
AJC & WIOA	Policy	10/1/2015	15-003 - WIOA Local Elected Official(s) and Local Workforce Development Board Partnership Agreement
AJC & WIOA	Policy	4/6/2021	16-006 - Adult Priority of Service
AJC & WIOA	Policy	10/1/2020	16-008 - Transfer of Funds between the Adult and Dislocated Worker Local Formula Funds
AJC & WIOA	Policy	11/1/2021	17-001 - Local Workforce Board Staff Hiring
AJC & WIOA	Policy	11/1/2021	17-002 - Internal Controls and Conflicts

WIOA Planning and Policy Documents			
			of Interest Requirements for Entities Performing Multiple Functions
AJC & WIOA	Policy	10/1/2020	17-003 - Recapture and Re-Allotment
AJC & WIOA	Policy	4/6/2021	18-001 - Co-Enrollment Requirements for All One-Stop Partners
AJC & WIOA	Guidance/Procedure	7/1/2020	20-003 - Supportive Services
AJC & WIOA	Policy	2/9/2021	21-004 Workforce On-line Reporting for Kentucky (WORK) System Monthly Expenditures
AJC & WIOA	Policy	1/1/2021	21-006 - Electronic Power of Attorney - WOTC Program
AJC & WIOA	Policy	2/1/2021	21-007 - Local and Regional Plans
AJC & WIOA	Guidance/Procedure	4/30/2021	21-008 - WOTC Guidance - Conditional Certification Program
AJC & WIOA	Policy	2/15/2022	22-001 - Data Entry Policy
AJC & WIOA	Policy	2/15/2022	22-002 - Case Notes Policy
AJC & WIOA	Policy	8/12/2022	22-003 - Disaster Recovery National Dislocated Worker

WIOA Planning and Policy Documents			
			Grant (DWG) Statewide Long-Term Unemployed and Significantly Underemployed Definitions
AJC & WIOA	Policy	3/16/2023	23-001 Allowable Costs
AJC & WIOA	Policy	3/16/2023	23-002 Common Exit From WIOA Partner Programs
AJC & WIOA	Policy	3/16/2023	23-003 Title I Formula Allocation Methodology
AJC & WIOA	Policy	3/16/2023	23-004 Trade Payments Reconciliation
Vets	Policy	3/16/2023	23-005 Veteran Referral Process
AJC & WIOA	Policy	3/16/2023	23-006 Financial Reporting Requirements
AJC & WIOA	Policy	7/13/2023	Data Validation (with attachments)
AJC & WIOA	Policy	10/19/2023	23-012 Kentucky Career Center American Job Center Common Identifier and Kentucky Career Center Brand Guidelines
	Memo	3/28/2022	DWD Expected Performance Measures FY22 & PY23

WIOA Planning and Policy Documents			
AJC & WIOA	Policy	3/16/2023	Grievance and Appeals Procedures for WIOA Program
	Guidance/Procedure	8/22/2022	KY Workforce Innovation Board By-Laws
Vets	Guidance/Procedure	3/16/2023	Standard Operating Procedures Jobs for Veterans State Grant (JVSG)

B. DESCRIBE HOW THE STATE INTENDS TO USE GOVERNOR'S SET ASIDE FUNDING FOR MANDATORY AND DISCRETIONARY ACTIVITIES, INCLUDING HOW THE STATE WILL CONDUCT EVALUATIONS OF TITLE I ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES.

Allocation set aside by WIOA for the Governor's discretionary fund, known as the Kentucky Statewide Reserve Fund, are divided into three primary categories of investment:

• Local innovation allocated to innovative workforce development projects on the local or regional level

• Local implementation of the Governor's priorities

• State investment in the Governor's priorities; including on-going state transformational activities such as the evaluation mentioned below

Monitoring Title I Adult, Dislocated Worker, and Youth activities under WIOA is a crucial process to ensure effective program implementation. Kentucky will evaluate on the following:

Performance Metrics Assessment:

- Title I Adult, Dislocated Worker, and Youth Activities programs must be evaluated based on performance metrics. These metrics include employment outcomes, skill gains, and participant satisfaction.
- We collect data on employment placement rates, earnings, credential attainment, and retention for participants in these programs.

- Regularly assess whether the programs are meeting their intended goals and making a positive impact on participants' lives.

Program Monitoring and Compliance:

- We will conduct regular monitoring of service providers and local workforce development areas.
- We will ensure that providers adhere to program guidelines, maintain fiscal integrity, and deliver quality services.
- We will do compliance checks that cover areas such as participant eligibility, service delivery, and financial management.

Stakeholder Engagement:

- We will involve key stakeholders, including local Workforce Development Boards (WDBs), employers, participants, and community organizations.
- We will Seek feedback on program effectiveness, identify challenges, and explore opportunities for improvement.
- We will hold regular meetings and surveys that can facilitate this engagement.

Data Analysis and Reporting:

- Analyze program data to identify trends, strengths, and areas for improvement.
- Generate performance reports that highlight achievements, challenges, and recommendations.
- Transparency in reporting ensures accountability and informs decision-making.

Continuous Improvement:

- Use evaluation findings to make data-driven decisions.
- Adjust program strategies, allocate resources effectively, and enhance service delivery.
- Encourage innovation and collaboration to improve outcomes.

Technical Assistance and Training:

- Provide technical assistance and training to program staff, service providers, and local WDBs.
- Ensure they understand program requirements, evaluation processes, and best practices.

And our comprehensive assessment of participants will ensure effective workforce development. Kentucky assessment process will include:

- Participant Needs and Goals: Assess participants' employment and training service needs, including their career goals and aspirations.

- Academic Levels: Evaluate their educational background and academic levels.
- Prior Work Experience: Understand their work history and relevant skills.
- Occupational Skill Levels and Abilities: Determine their existing skills and abilities related to specific occupations.
- Supportive Service Needs: Identify any additional support services (e.g., transportation, childcare) required for successful participation.
- Barriers and Strengths: Recognize both obstacles (barriers) and strengths that may impact their progress.
- Employability Potential and Developmental Needs: Assess their overall employability and areas for growth.

By considering these factors, Kentucky can tailor their programs to meet the unique needs of participants and enhance workforce outcomes.

C. 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.

Rapid Response is a service through federal Rapid Response grant funds. Lay-off aversion and such are handled through the Rapid Response unit. Information regarding company closures and statewide Rapid Response information is provided by staff within our Office of Industry and Apprenticeship Services.

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

Rapid Response strategies and initiatives play a pivotal role in addressing closures, layoffs, or extensive job dislocations, including those arising from natural disasters. The paramount goal is to expedite the transition of dislocated workers into new employment opportunities. In instances of natural disasters, the Rapid Response emergency assistance provisions are tailored to align with the unique characteristics of the disaster. The Kentucky Career Center (KCC) Rapid Response Unit operates collaboratively under the direction of the Kentucky Emergency Management (KEM) accessible at https://kyem.ky.gov/ and the Federal Emergency Management Association (FEMA) at https://www.fema.gov/.

Within the bounds of reasonableness, necessity, and permissibility, the Rapid Response initiative may extend guidance and financial support to establish local community transition teams. These teams play a crucial role in organizing support for dislocated workers and addressing the fundamental needs of their

families, encompassing provisions for heat, shelter, food, clothing, and other essential services. The collaborative effort goes beyond the resources and capabilities of the KCC alone. Following the immediate and initial response, if required, the KCC Rapid Response Unit will closely coordinate with KEM and FEMA to facilitate the delivery of services for the project, including the involvement of local workforce development area Rapid Response teams. This coordination may also involve the submission of an application for a National Dislocated Worker Grant, if deemed necessary.

The procedural steps outlined below articulate the actions to be taken by the agency responsible for managing the aftermath of a disaster, all within the context of the WIOA state plan:

1. Identification of the affected location WIOA area(s) and specific counties – overseen by the KCC State Rapid Response Unit.
2. Contacting the appropriate WIOA area designees for both the workforce development board and fiscal agent – managed by the KCC State Rapid Response Unit.
3. Establishing communication with KEM and FEMA – coordinated by the KCC State Rapid Response Unit.
4. Ensuring robust communication and collaboration between KCC Rapid Response efforts and the initiatives of KEM and FEMA – directed by the KCC State Rapid Response Unit.
5. Discussion on the extent of the disaster and the availability of dislocated worker funds – led by the KCC State Rapid Response Unit.
6. Deliberation on projected participant service levels and re-employment need to address disaster-related outcomes – overseen by the KCC State Rapid Response Unit
7. Providing Rapid Response Additional Assistance funding request forms to local WIOA area(s) for additional funds – managed by the KCC State Rapid Response Unit.
8. Processing and reviewing the Rapid Response Additional Assistance application and making recommendations for funding – handled by the KCC State Rapid Response Unit.
9. Informing the local WIOA area designee about the approval of the award by the KCC Rapid Response Unit.
10. Determining is an application for National Dislocated Worker Grant funds is necessary – a responsibility of the KCC State Rapid Response Unit.

The policies and protocols developed through collaborative efforts will be implemented in the event of any subsequent significant natural disaster.

E. DESCRIBE HOW THE STATE PROVIDES EARLY INTERVENTION (E.G., RAPID RESPONSE) AND ENSURES THE PROVISION OF APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A TRADE ADJUSTMENT ASSISTANCE (TAA) PETITION HAS BEEN FILED. (SECTION 134(A)(2)(A) AND TAA SECTION 221(A)(2)(A) .) THIS DESCRIPTION

MUST INCLUDE HOW THE STATE DISSEMINATES BENEFIT INFORMATION TO PROVIDE 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 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 AND HOW THE STATE WILL ENSURE THE PROVISION OF APPROPRIATE CAREER SERVICE TO WORKERS IN THE GROUPS IDENTIFIED IN THE PETITION (TAA SEC. 221(A)(2)(A)).NOTE: UNTIL THE TAA PROGRAM IS REAUTHORIZED, THE REQUIREMENTS TO PROVIDE RAPID RESPONSE AND APPROPRIATE CAREER SERVICES TO WORKER GROUPS ON WHOSE BEHALF A PETITION HAS BEEN FILED IS NOT APPLICABLE.

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 OIAS, CDO, Adult Education, 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
- WIOA 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.

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.

In alignment with the Education and Labor Cabinet's priority to expand and enhance work-based learning opportunities, the State is implementing strategies that engage employers in developing positions combining paid, hands-on experience with related educational instruction. To ensure high-quality outcomes for both participants and employers, all WIOA Title I and Trade programs are being revised to broaden access to on-the-job training, and Registered Apprenticeships. These models are designed to align training with current and emerging industry needs, support participants in gaining industry-recognized skills and credentials, and strengthen employer capacity to recruit, retain, and advance a skilled workforce

2. REGISTERED APPRENTICESHIP

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., outreach to sponsors and prospective sponsors, identifying potential participants and connecting them to apprenticeship opportunities).

In the commitment to incorporating Registered Apprenticeships (RAs) into the state's service design and delivery strategy for the next four years, the Office of Industry and Apprenticeship Services (OIAS) places a strong emphasis on outreach to sponsors and prospective sponsors, identifying potential participants, and connecting them to apprenticeship opportunities. We recognize that collaboration with various workforce partners across the state is pivotal to this endeavor, and the Kentucky Career Center serves as the unifying force connecting these efforts.

The approach encompasses working closely with a range of internal workforce partners, including the Office of Adult Education, Kentucky Department of Libraries and Archives, Career Development Office, Office of Vocational Rehabilitation, Kentucky Governor's Office of Early Childhood, the Kentucky Department of Education, Everybody Counts and the Workforce Innovation Board. This collaboration ensures a holistic approach to identifying and connecting potential participants with apprenticeship opportunities.

The Kentucky Career Center plays a central role in this process, acting as the linchpin in coordinating the efforts of all these partner organizations. As the connector, the Career Center ensures that orders and information are efficiently cascaded down to the local level, thus bridging the gap between workforce partners and prospective sponsors.

Through this concerted effort, we aim to achieve the following:

1. Coordinated Outreach: Through collaboration among workforce and education partners, we will implement a unified outreach strategy to engage employers interested in developing or expanding registered apprenticeship programs and increase awareness among job seekers. By aligning communication efforts and leveraging shared resources, partners will promote apprenticeship as a key strategy for meeting employer demand and advancing career pathways.

2. Enhanced Identification: Partner collaboration enhances our capacity to identify and recruit potential apprentices across multiple programs and service populations. Through the combined efforts of WIOA Title I providers, Adult Education, Vocational Rehabilitation, and other partner agencies, outreach will target diverse populations, including youth, veterans, dislocated workers, and individuals with barriers to employment.

3. Efficient Connection: The Kentucky Career Center (KCC) system serves as the central coordination point for connecting job seekers to apprenticeship opportunities. Integrated case management and referral processes will ensure that participants are efficiently matched to programs aligned with their skills, interests, and career goals, reducing barriers to enrollment and improving placement outcomes

4. Education and Training Coordination: Collaboration with the Kentucky Community and Technical College System, secondary education partners, and the Office of Career and Technical Education ensures that related instruction aligns with industry standards and employer needs. This coordination supports quality training outcomes and helps apprentices earn industry-recognized credentials that advance both their employment and education goals.

By working in close partnership with the workforce system partners and with the Kentucky career center serving as the central coordinator, the state will leverage the resources to advance registered apprenticeships as a key strategy in workforce development. This approach ensures a robust, employer-driven system that effectively identifies potential participants, connects them with apprenticeship opportunities, and expands access to high-quality career pathways across Kentucky.

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).

Kentucky's Eligible Training Provider List (ETPL) is a web-based system that allows training institutions to electronically submit their applications for approval by the Department of Workforce Development (DWD). Training institutions and their programs that meet specific criteria may be eligible for Kentucky's ETPL. Eligible training providers may deliver occupational training programs to Workforce Innovation and Opportunity Act (WIOA) participants. Training institutions, LWDAs, KCCs, as well as the public at-large, may access the list of approved providers at www.etpl.ky.gov.

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 types (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 the Commission on Proprietary Education).

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://kcpe.ky.gov/.

Upon creation of the ETPL account, the provider submits the necessary information to the Division of Technical Assistance within the Department of Workforce Development. Once the information is reviewed and the account is approved by the Coordinator, the provider receives approval to access the ETPL site.

2. **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:

- A current principal place of business address.
- 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).
- A letter of support from a local workforce development area that attests to a workforce need for the trainings.
- A Memorandum of Understanding.

3. **Completion of Program Application***: Providers must complete an application for <u>each</u> program they wish to be included on the ETPL. Information collected for each program includes:

    a. Name of the Institution
    b. Program name
    c. CIP code (link to codes provided on application screen)
    d. Training program description
    e. Method of instruction
    f. Date program established
    g. Tracking plan to gather student data (required for WIOA)
    h. HEA status (approved or not)
    i. Degree or certificate awarded at completion
    j. Length of training program
    k. Availability of online program
    l. Costs of training program (tuition, textbooks, supplies, fees, miscellaneous costs)

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.)

4. **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 Division of Technical Assistance within the Department of Workforce Development and placed on the ETPL website.

ETPL Approval Process

Once the provider has completed all necessary application steps, the Division of Technical Assistance will review all documents – including an executed Memorandum of Understanding (MOU) – and approve the applications. 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;
2. Training Providers that willfully and knowingly submit false information will be removed;
3. Training Providers that fail to meet required Subsequent Eligibility Requirements will be removed; and
4. Training Providers that fail to maintain required certifications and licenses will be removed.

A removal from the ETPL will remain in effect for a minimum of two years; providers are allowed to appeal the removal using the procedure outlined in the Memorandum of Understanding.

Initial Eligibility Determination

All programs that were not previously approved as eligible under WIA (except Registered Apprenticeship programs) must submit the required information to be considered for initial eligibility under WIOA. Under WIOA, training programs may receive initial eligibility for only one year for each program. For potential ETPs seeking initial eligibility, verifiable program-specific performance information must be provided.

In addition to an application, an applicant must also provide the following:

- A detailed description of each training program – Provide information that the program is a high-quality program, which can include information related to training services that lead to a recognized post-secondary credential, or a wage more than 150% of the Kentucky self-sufficiency wage, or successful outcomes across all population group.
- Performance information for each training program, including:
    1. The program completion rate;
    2. The employment rate for all students during the second quarter after completion;
    3. The employment rate for all students during the fourth quarter after completion;
    4. Median earnings for all students during the second quarter after completion; and
    5. Credential attainment rate.

- Additional Requirements:
    - An assurance that the applicant has been in business for at least six months prior to the initial application and has a current license or proof of active compliance with laws required for operation in Kentucky.
    - An assurance that the applicant is current on all federal and State taxes (Must supply certification from accounting/tax firm of current tax standing regarding federal and State taxes, including Unemployment Insurance taxes).
    - An assurance that the training facilities comply with ADA requirements for accessibility and the provider provides reasonable accommodations.
    - An assurance that the applicant will protect and safeguard the confidentiality of WIOA participant personally identifiable information.
    - An assurance the applicant will comply with all applicable federal, state, local laws, policies and guidance's.

- An assurance that the applicant will provide DWD access to or copies of, business records of the training provider that will enable the DWD to adequately evaluate the training provider for initial and continued eligibility purposes.

Subsequent Eligibility Determination

Programs will be evaluated on a biennial basis to determine subsequent eligibility based on student performance data. To remain on the list, providers must:

1. Maintain a completion rate of 20% and an entered employment rate of 50%.
2. Enroll, at a minimum, five WIOA-funded participants each program year;
3. Submit student-level data on ALL participants for each program approved to KYSTATS annually;
4. Maintain in good standing all licensure requirements by the applicable state and/or federal regulatory body
5. Submit a renewal application for the program that:
    a. Describes how the training program(s) relate to in-demand industry sectors and occupations identified by the State or local area.
    b. Describes the industry-recognized certificates and credentials earned at completion.
    c. Demonstrates to DWD's satisfaction that only the highest quality of training services that leads to a recognized postsecondary credential are being provided.
    d. Describes how the provider is able to provide trainings that are physically and programmatically accessible for individuals who are employed and individuals with barriers to employment (as defined in WIOA), including individuals with disabilities
    e. Details the provider's procedures and process for receiving and promptly resolving WIOA participant complaints.
6. Submit an executed, unexpired memorandum of understanding (MOU).

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.

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 31st 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 via a Reciprocal Agreement if the school or program accepts Kentucky Educational Excellence Scholarship funding (www.kheaa.com).

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. Lastly, providers may be subject to onsite visits from the Division of Technical Assistance or local workforce development boards (LWDBs).

Additional Information Requested includes:

The Commonwealth of Kentucky leverages technology and online resources for individuals in rural areas to better align them with the eligible training providers under WIOA and pursue their career goals. This includes:

- Online Resources: Utilize online resources provided by the KCC (Kentucky Career Centers), which often includes a statewide database of eligible training providers and programs.

- Virtual Tours and Information Sessions: Many training providers offer virtual tours and information sessions online. The Commonwealth of Kentucky will take advantage of this resource in the KCC and online to learn more about the programs offered.
- Webinars and Workshops: The statewide KCC network is tasked to search for webinars and workshops hosted by training providers or workforce development organizations. These can provide valuable insights into available programs and eligibility requirements.
- Remote Counseling Services: The KCC network will promote the use of remote counseling services via phone or videoconferencing. This will continue into scheduling an appointment to discuss individuals' training options and help with navigating the process.
- Online Reviews and Testimonials: The Commonwealth of Kentucky will research training providers online and look for reviews and testimonials from past participants, which will help gauge the quality and effectiveness of their programs.
- Networking and Peer Support: Encourage individuals to join online forums or social media groups related to the field they're interested in. Connecting with peers and professionals in their industry of interest can provide valuable insights and recommendations for individuals.

These metrics will be assessed through the KCC network. The ETPL coordinator will receive the data, review it, and recommend efficiencies if necessary.

Information reported to state agencies on federal and state training programs other than WIOA Title I-B programs:

Kentucky, in collaboration with state agencies and workforce development partners, is committed to increasing data sharing. This sharing will focus on disseminating information about education and employment outcomes and best practices among employers. The aim is to foster a deeper understanding of these outcomes and facilitate the adoption of effective employer practices.

Our dedicated staff has made significant strides in ensuring the Eligible Training Provider Listing (ETPL) is a true reflection of Kentucky's diverse and inclusive workforce development. This comprehensive listing proudly features agencies from various sectors, including the 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 Education and Labor Cabinet, including the Office of Industry and Apprenticeship Services, and Office of Adult Education.

The ETPL will continue as a vital sub-function of KWIB Education Attainment Committee and play a crucial role in ensuring the list remains comprehensive and accessible for all prospective participants.

In addition to the WIOA Title I-B programs, Kentucky reports on federal and state training initiatives. These programs play an important role in workforce development. The Title II Adult Education program focuses on adult education and literacy services, which assist people improve their skills and knowledge.

Title III-Wagner-Peyser provides employment services and labor market information to help job seekers find work. Title IV-Vocational Rehabilitation Services help people with disabilities achieve their job goals by providing the necessary support and resources. These programs help to establish a strong and inclusive workforce system that benefits both job seekers and employers. We provide training to help us meet the WIOA Title II standards outlined in Section 203. Our counseling staff searches the approved provider list to find training providers for the people we serve. The Perkins Center offers many training programs, including cosmetology, oil lubrication, and forklift training.

Timeliness and accuracy of ETP's performance reports.

To ensure the accuracy of ETP data, the Commonwealth of Kentucky performs annual data validation against all ETPs. Validated data consists of previously submitted student data, training program, and provider information.

The ETP must meet the minimum enrollment threshold before they are queried in the data validation process. The enrollment threshold is as follows:

1. An ETP must have a minimum of fifteen (15) WIOA participants enrolled in its combined program offerings over a two (2) year period.

The state must describe what it considers to be a "substantial violation of the requirement to timely and accurately submit all required information…" Are there any other factors than not submitting an annual report?

Substantial violations in submitting reporting information for the ETPL involve significant delays or inaccuracies that hinder the list's proper functioning or integrity. This could include consistently missing deadlines or providing incomplete or erroneous data. Penalties for such violations will vary according to Cabinet policies.

4. DESCRIBE HOW THE STATE WILL IMPLEMENT AND MONITOR FOR THE ADULT PRIORITY OF SERVICE REQUIREMENT IN WIOA SECTION 134 (C)(3)(E) THAT REQUIRES AMERICAN JOB CENTER STAFF, WHEN USING WIOA ADULT PROGRAM FUNDS TO PROVIDE INDIVIDUALIZED CAREER SERVICES AND TRAINING SERVICES, TO GIVE PRIORITY OF SERVICE TO RECIPIENTS OF PUBLIC ASSISTANCE, LOW-INCOME INDIVIDUALS, AND INDIVIDUALS WHO ARE BASIC SKILLS DEFICIENT (INCLUDING ENGLISH LANGUAGE LEARNERS).

In adhering to the Adult Priority of Service requirement in WIOA section 134(c)(3)(E), which mandates that American Job Center staff prioritize recipients of public assistance, low-income individuals, and individuals who are basic skills deficient (including English language learners) when using WIOA Adult program funds for individualized career and training services, the Office of Employer and Apprenticeship Services, in collaboration with the ETPL Coordinator, is dedicated to a proactive and vigilant approach.

To effectively implement and monitor this priority of service requirement, we have devised a multifaceted strategy:

1. Training and Capacity Building: The Office of Employer and Apprenticeship Services and the ETPL Coordinator will collaborate closely with state and local Workforce Innovation Boards and local WIOA contractors. This partnership is instrumental in ensuring that front-line employees, including American Job Center staff, are well-informed and adequately trained on the requirements and nuances of the priority of service provisions. This training will equip them with the knowledge and skills necessary to identify and provide specialized services to eligible individuals promptly.

2. Clear Guidelines and Procedures: We are committed to developing and providing clear and concise guidelines and procedures that outline how the priority of service should be implemented in practice. These guidelines will include detailed instructions on identifying eligible individuals and the specific services and support they are entitled to under WIOA. By disseminating this information throughout our workforce network, we ensure consistent and equitable service delivery.

3. Application Monitoring: The implementation of the Adult Priority of Service requirement also necessitates robust application monitoring processes. Our strategy includes training front-line staff and monitors to ensure that WIOA applications for services are not only processed efficiently but also filled out completely and accurately. This proactive approach helps in the accurate determination of eligibility and prevents inadvertent discrimination against eligible individuals.

4. Regular Audits and Compliance Checks: To maintain accountability and adherence to the priority of service requirement, we will conduct regular audits and compliance checks. This includes periodic reviews of service delivery to verify that the priority individuals are receiving the support they are entitled to, as well as assessing the accuracy and completeness of application processes.

5. Feedback Mechanisms: We will establish mechanisms for feedback and reporting. Front-line staff, monitors, and clients will have channels through which they can report concerns or violations of the priority of service requirement. This feedback loop ensures that any issues are addressed promptly and that corrective actions are taken.

In conclusion, our approach to implementing and monitoring the Adult Priority of Service requirement in WIOA is comprehensive and focused on ensuring equitable access to services for the specified priority groups. Through training, clear guidelines, application monitoring, audits, and feedback mechanisms, we aim to create a system that not only adheres to federal regulations but also reflects our commitment to the welfare and development of all eligible individuals in our state. This approach ensures that the American Job Center staff provide tailored, supportive, and effective services to those who need them most.

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

Under the Workforce Innovation and Opportunity Act (WIOA), a local workforce board may transfer up to 100 % of an area's program year formula allocation between adult and dislocated worker funds. This authority is provided under WIOA as long as the request meets the Governor's approval.

Policy 16-008 provide the guidance and parameters for transferring up to 100 % of a program year allocation for adult employment and training activities and up to 100 % of a program year allocation for dislocated worker employment and training services between the two programs.

Request of funds -- The transfer request must be submitted on the attached form and contain the following information:

- Justification for the transfer (e.g. depletion of current funds, why a need to transfer, etc.);
- How the funds transfer will impact the participant levels in both programs;
- Transfer's effect on potential recipients of services under each funding stream.
- Description of expected impact on WIOA performance outcomes for both funding streams; and
- Assurance of adequate funding for remainder of program year.

Funds not subject to transfer requests - The following funds are not subject to transfer:

- Adult or dislocated worker funds reallocated by the Department of Workforce Development;
- Funds awarded to the state under National Dislocated Worker Grants (NDWG);
- Funds reserved under the Governor's 15 % discretionary rules; and
- Youth Funds Considerations - Transfer requests may be submitted anytime during the two-year period of availability of funds.

Funds transferred must stay within the original year of obligation. They must also stay within their respective obligation time period. Accordingly, local areas cannot transfer funds between program years. In addition, local areas must ensure that funds are not overdrawn during the time a transfer takes place. If this occurs, the transfer will not be approved.

When submitting a transfer of funds request, the request MUST include the following:

- Current labor market information to assess justification for the request to transfer the funds.
- Current performance data to assess justification in the transfer of funds.
- Summarization of the outreach process and recent increases in numbers.
- How the transfer will affect the cost per participant and the LWDB has adjusted the cost per participant for the local area

- Assurance that the LWDB has made every effort to recruit and market the availability of services to participants

Local Workforce Development Boards (LWDBs) should be aware that the lack of or a limited number of participants for a particular funding stream does not automatically provide justification for a transfer of funds from one program to another program.

Requests for transfers must be made by email and must be signed by the designated fiscal agent. LWDBs should consult with Program Directors to ensure that funding requests are in line with local and regional plans with regard to the ability to serve adult and dislocated workers based on area needs and percentages.

Implications of transferring 100 % of funds - Local areas may not apply for additional assistance funds based on the contention of dislocated worker allocation "formula insufficiency" resulting from the transfer. However, if a local area transfers 100 % of its dislocated worker formula funds and a dislocation event occurs in the local area, (e.g., specific employer layoff or disaster that changes the local economic conditions), the state will consider a local area request for additional assistance funds on a case-by-case basis.

Monitoring - At the local level, the workforce development area and/or the fiscal agent must conduct oversight of the transfer of WIOA adult and dislocated worker funds to ensure the transfer is being completed per this policy.

Through the state's monitoring system, fiscal monitors will review the area's transfer of adult and dislocated worker funds during the annual onsite monitoring review for compliance with federal and state laws and regulations.

Any issues will be handled through the state's monitoring resolution process. Submission Process - LWDAs shall submit the completed form to Compliance.Unit@ky.gov for processing.

6. DESCRIBE THE STATE'S POLICY ON WIOA AND TAA CO-ENROLLMENT AND WHETHER AND HOW OFTEN THIS POLICY IS DISSEMINATED TO THE LOCAL WORKFORCE DEVELOPMENT BOARDS AND REQUIRED ONE-STOP PARTNERS. TRADE ACT SEC. 239(F), SEC. 235, 20 CFR 618.325, 20 CFR 618.824(A)(3)(I).

POLICY NAME: CO-ENROLLMENT REQUIREMENTS FOR ALL ONE-STOP PARTNERS POLICY NUMBER: 18-001 DATE OF ISSUE: Reissued March 1, 2023 EFFECTIVE DATE: April 6, 2021

PURPOSE: The One Workforce System embraces a culture of a united workforce so that a customer may be served by any staff member within a Kentucky Career Center. In order to implement this policy, individuals enrolled in WIOA Title I Adult and Dislocated Worker Programs must be co-enrolled in both Wagner-Peyser and the Trade Adjustment Assistance (TAA) Programs, if applicable. Although

WIOA encourages co-enrollment in all four core programs (i.e., WIOA Title I, Wagner-Peyser, Vocational Rehabilitation and Adult Education) this policy addresses REQUIRED co-enrollment of participants under the WIOA Title I Adult and Dislocated Worker (DW) programs, Wagner-Peyser, and the Trade Adjustment Assistance. In addition to the USDOL required co-enrollment with the WIOA DW program, based on the needs of the trade-affected worker, co-enrollment can be further enhanced and expanded to include a broad range of services available through other workforce programs in order to produce successful outcomes. Such programs include, but are not limited to, Wagner-Peyser Act Employment Service (ES) activities, WIOA Adult program, WIOA Dislocated Worker Grant (DWG) program, Unemployment Insurance (UI), other WIOA partner programs, faith-based and community-based programs, vocational rehabilitation services, and services for veterans

activities will be co-enrolled in Wagner-Peyser, WIOA, and if eligible Trade Adjustment Assistance 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, WIOA, and if eligible Trade Adjustment Assistance (TAA) performance measures. Under 20 CFR §680.110(a), registration is the process for collecting information to support a determination of eligibility. Participation occurs after the registration process when the individual receives a staff-assisted WIOA service, which does not include self-service or information activities. Under 20 §CFR §680.110 (b), adults and dislocated workers who receive services funded under Title I other than self-service or informational activities must be registered and must be a participant. If the customer is receiving services at a Kentucky Career Center, staff should 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 (WOA), staff will verify the customer's DOB and Vets information, if applicable, and record any activities that have been completed. An overnight batch process will then look for activities that trigger co-enrollment and the customer will be enrolled in both WIOA, Wagner-Peyser, and if eligible, Trade Adjustment Assistance. Eligible registrants may access self-service and informational services available at all locations. Customers may not receive any funded career or training services until additional WIOA eligibility documentation has been completed. Staff should check the DOB/VETS Verification tab in the system of record on prior registered customers who return to any Career Center for services and update the record with proper DOB/VETS information as legacy records will not have complete information. Staff should determine if the current DOB documentation has expired and update as needed. Failure of the customer to provide needed documentation shall not preclude delivery of services to the customer. TAA Program, WIOA DW, and DWG co-enrollment may provide trade-affected workers with career and supportive services that are not available through the TAA Program. DWG co-enrollment can be used to provide potential trade-affected workers with career, training, and supportive services when state WIOA DW funds are not sufficient to provide such services. Eligible trade-affected workers may receive DWG-funded training only if the available training is not covered by the TAA Program. DWG and TAA funds must be managed in a coordinated manner to best meet the needs of the trade- affected workers while abiding by all applicable statutes, regulations, and federal policies. The DWG project guidance, TEGL No. 12-19, provides more details on the circumstances for provisions of training. The Trade Act, as

amended, allows states to pay for a training program approved under the Act with TAA funds or from other sources, but does not allow duplication of payment of training costs. (See 20 CFR §618.625.) Under certain circumstances, a state can use funding from more than one program to fund training; however, TAA funds can only reimburse training costs incurred after a trade-affected worker was certified and determined individually eligible for TAA, and that training must be TAA-approved. Additionally, 20 CFR §618.625(c) requires that the TAA Program be the primary source of assistance to trade-affected workers. To the extent trade-affected workers enrolled in the TAA Program require assistance or services not authorized under the TAA Program, or for which TAA Program funds are unavailable or insufficient (including for required employment and case management services), states must provide such assistance through other federal programs, including programs in the AJC network.

7. DESCRIBE THE STATE'S FORMAL STRATEGY TO ENSURE THAT WIOA AND TAA CO-ENROLLED PARTICIPANTS RECEIVE NECESSARY FUNDED BENEFITS AND SERVICES. TRADE ACT SEC. 239(F), SEC. 235, 20 CFR 618.816(C)

Co-enrollment in multiple programs delivers comprehensive services to customers who have barriers to employment. 20 C.F.R §679.560 describes the creation and content of the Local Board's state plan. More specifically, (b)(2)(ii) dictates that Local Boards must describe how they will work with entities carrying out core programs to develop career pathways and co-enrollment, as appropriate.

Coordinating services and eliminating barriers to success early in the process will reduce the likelihood that customers will have to re-enter the public workforce system in the future. WIOA gives states the authority to establish policies and guidelines related to verifying WIOA and Employment Services eligibility as long as the policies are consistent with WIOA, the WIOA regulations, the Wagner-Peyser Act, the Trade Adjustment Assistance Act, among other regulations, and federal statutes. Policy 18-001 provides the co-enrollment requirements for all one-stop partner.

The One Workforce System embraces a culture of a united workforce so that a customer may be served by any staff member within a Kentucky Career Center. In order to implement this policy, individuals enrolled in WIOA Title I Adult and Dislocated Worker Programs must be co-enrolled in both Wagner-Peyser and the Trade Adjustment Assistance (TAA) Programs, if applicable.

Although WIOA encourages co-enrollment in all four core programs (i.e., WIOA Title I, Wagner-Peyser, Vocational Rehabilitation and Adult Education) this policy addresses REQUIRED co-enrollment of participants under the WIOA Title I Adult and Dislocated Worker (DW) programs, Wagner-Peyser, and the Trade Adjustment Assistance.

In addition to the USDOL required co-enrollment with the WIOA DW program, based on the needs of the trade-affected worker, co-enrollment can be further enhanced and expanded to include a broad range of services available through other workforce programs in order to produce successful outcomes. Such programs include, but are not limited to, Wagner-Peyser Act Employment Service (ES) activities, WIOA Adult program, WIOA Dislocated Worker Grant (DWG) program, Unemployment Insurance (UI), other WIOA partner programs, faith-based and community-based programs, vocational

rehabilitation services, and services for veterans. Partnerships may be facilitated at the state and local board level, as that leadership is deemed vital to the success of co-enrollment.

Adults and dislocated workers who receive KCC/ AJC services other than self-service and informational activities will be co-enrolled in Wagner-Peyser, WIOA, and if eligible Trade Adjustment Assistance 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, WIOA, and if eligible Trade Adjustment Assistance (TAA) performance measures. Under 20 CFR §680.110(a), registration is the process for collecting information to support a determination of eligibility. Participation occurs after the registration process when the individual receives a staff-assisted WIOA service, which does not include self-service or information activities.

Under 20 §CFR §680.110 (b), adults and dislocated workers who receive services funded under Title I other than self-service or informational activities must be registered and must be a participant. The state has established a standard for paperless co-enrollment registration based on the definition of self-attestation and implemented through the Focus Career system. Once a customer has registered in the Focus Career system, the information is electronically shared and integrated into the system of record.

If the customer is receiving services at a Kentucky Career Center, staff should 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 (WOA), staff will verify the customer's DOB and Vets information, if applicable, and record any activities that have been completed. An overnight batch process will then look for activities that trigger co-enrollment and the customer will be enrolled in both WIOA, Wagner-Peyser, and if eligible, Trade Adjustment Assistance.

Eligible registrants may access self-service and informational services available at all locations. Customers may not receive any funded career or training services until additional WIOA eligibility documentation has been completed.

Staff are instructed to check the DOB/VETS Verification tab in the system of record on prior registered customers who return to any Career Center for services and update the record with proper DOB/VETS information as legacy records will not have complete information. Staff should determine if the current DOB documentation has expired and update as needed. Failure of the customer to provide needed documentation shall not preclude delivery of services to the customer.

TAA Program, WIOA DW, and DWG co-enrollment may provide trade-affected workers with career and supportive services that are not available through the TAA Program. DWG co-enrollment can be used to provide potential trade-affected workers with career, training, and supportive services when state WIOA DW funds are not sufficient to provide such services.

Eligible trade-affected workers may receive DWG- funded training only if the available training is not covered by the TAA Program. DWG and TAA funds must be managed in a coordinated manner to best meet the needs of the trade- affected workers while abiding by all applicable statutes, regulations, and federal policies. The DWG project guidance, TEGL No. 12-19, provides more details on the circumstances for provisions of training.

The Trade Act, as amended, allows states to pay for a training program approved under the Act with TAA funds or from other sources, but does not allow duplication of payment of training costs. (See 20 CFR §618.625.) Under certain circumstances, a state can use funding from more than one program to fund training; however, TAA funds can only reimburse training costs incurred after a trade-affected worker was certified and determined individually eligible for TAA, and that training must be TAA-approved. Additionally, 20 CFR §618.625(c) requires that the TAA Program be the primary source of assistance to trade-affected workers. To the extent trade-affected workers enrolled in the TAA Program require assistance or services not authorized under the TAA Program, or for which TAA Program funds are unavailable or insufficient (including for required employment and case management services), states must provide such assistance through other federal programs, including programs in the AJC network.

8. DESCRIBE THE STATE'S PROCESS FOR FAMILIARIZING ONE-STOP STAFF WITH THE TAA PROGRAM. 20 CFR 618.804(J), 20 CFR 618.305

Training is delivered to staff during new employee orientations, region specific requests, Program Specific Standard Operating Procedures, Handbook, annual conferences, monthly and quarterly regional meetings including all partners/one stop staff and supervisors/leadership. Additional trainings/communications are shared with all one-stop staff if a need is identified.

By law, USDOL has been unable to certify new petitions for workers after July 1, 2022, which means no new groups of workers can qualify for a TRADE program (TAA), after that date. Workers who were certified before July 1, 2022, can still receive TAA benefits and services (like training, job search allowances, wage supplements, etc.), but no new groups can enter the program. Furthermore, the Petition Automated Workflow System (PAWS), which allowed the public to submit TAA petitions online, was fully decommissioned in May 2025. Now, petitions are no longer being accepted at all. While TAA was historically reauthorized multiple times by Congress, currently it is in a suspended state, while it is technically still operating for previously certified workers, no new workers will be added unless Congress acts to reauthorize the program. In summary, the (TAA) is currently closed to new participants, but existing certified workers still receive services, although in limited numbers despite extensive outreach efforts.

C. YOUTH PROGRAM REQUIREMENTS.

With respect to youth workforce investment activities authorized in section 129 of WIOA, States should describe their strategies that will support the implementation of youth activities under WIOA. State's must-

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.[11] FURTHER, INCLUDE A DESCRIPTION OF HOW THE STATE ASSISTS LOCAL AREAS IN DETERMINING WHETHER TO CONTRACT FOR SERVICES OR TO PROVIDE SOME OR ALL OF THE PROGRAM ELEMENTS DIRECTLY.

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 design, collaboration with service providers, service delivery and other components. Performance will be reviewed and analyzed both at the state and local level to ensure all the youth elements are being made available to all youth and that youth are meeting expectations outlined in the grants.

Additional information including a description of how the state will assist local areas in determining whether to contract for services or provide some or all of the program elements directly needs to be added.

The Commonwealth of Kentucky currently has a statewide Youth Coordinator who conducts monthly Youth calls with all ten local workforce development areas. Those calls provide technical assistance, address questions, and relay information as it has been received from USDOL. In addition, monitoring is conducted to ensure that all program elements have been made available to participants.

2. EXPLAIN HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN ACHIEVING EQUITABLE RESULTS FOR OUT-OF-SCHOOL AND IN-SCHOOL YOUTH. DESCRIBE PROMISING PRACTICES OR PARTNERSHIP MODELS THAT LOCAL AREAS ARE IMPLEMENTING AND THE STATE'S ROLE IN SUPPORTING AND SCALING THOSE MODELS WITHIN THE STATE FOR BOTH IN-SCHOOL AND OUT-OF-SCHOOL YOUTH.

The Commonwealth continues to assist the Local Workforce Boards through technical assistance, policy development and guidance by establishing a framework that both In-School and Out-of-School youth have access to opportunities and resources. Promising practices include, but are not limited to, outreach, mentorship programs, and strong collaborative partnerships with local community organizations. The commonwealth also emphasizes local partnership models to involve educational institutions, local businesses, and nonprofits to create comprehensive support systems for Kentucky youth. Support and scaling these models are ensured by providing technical assistance and facilitating cross-sector collaborations which helps address the needs of both In-School and Out-of-School youth by fostering a more inclusive and equitable workforce development approach.

3. DESCRIBE HOW THE STATE ASSISTS LOCAL WORKFORCE BOARDS IN IMPLEMENTING INNOVATIVE MODELS FOR DELIVERING YOUTH WORKFORCE INVESTMENT ACTIVITIES, INCLUDING EFFECTIVE WAYS LOCAL WORKFORCE BOARDS CAN MAKE AVAILABLE THE 14 PROGRAM ELEMENTS DESCRIBED IN WIOA SECTION 129(C)(2); AND EXPLAIN HOW LOCAL AREAS CAN ENSURE WORK EXPERIENCE, INCLUDING QUALITY PRE-APPRENTICESHIP AND REGISTERED APPRENTICESHIP, IS PRIORITIZED AS A KEY ELEMENT WITHIN A BROADER CAREER PATHWAYS STRATEGY.

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 plans. 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 workforce development 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 % 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/apprenticeship programs and work-based learning opportunities around the state.

Additional information including registered apprenticeship and an explanation of how local areas ensure work experience is prioritized as a key element within their broader career pathways strategy, including both quality pre-apprenticeship and registered apprenticeship as follows:

Local workforce areas can prioritize work experience under the Workforce Innovation and Opportunity Act (WIOA) by integrating it as a key component of their broader career pathways strategy through several steps:

- Needs Assessment: Conduct a thorough assessment of the local labor market to identify industries and occupations with high demand for skilled workers. Determine the types of work experience and skills employers are seeking.
- Communication: Monthly calls between the Commonwealth of Kentucky and the ten local workforce areas are ongoing, and part of the emphasis during these events is the importance of Work Experience integrated with each local area's workforce strategy. This includes pre-apprenticeship and registered apprenticeship programs.

- Employer Engagement: Collaborate with local businesses and industries to understand their workforce needs and create opportunities for work-based learning experiences such as internships, apprenticeships, on-the-job training, and job shadowing.
- Education and Training Alignment: Ensure that the education and training programs offered in the area align with employers' needs and provide opportunities for individuals to gain relevant work experience while acquiring skills.
- Career Pathways Development: Develop clear pathways that allow individuals to progress from education and training programs to entry-level employment, career advancement, and further education or training opportunities, all while gaining valuable work experience along the way.
- Supportive Services: Provide supportive services such as career counseling, job coaching, transportation assistance, and childcare to help individuals overcome barriers to participating in work-based learning experiences.
- Performance Metrics: Establish performance metrics and goals related to work experience participation and outcomes and regularly monitor and evaluate progress toward achieving these goals.
- Partnerships: Forge partnerships with other local organizations, such as educational institutions, community-based organizations, and economic development agencies, to leverage resources and expertise in implementing work-based learning initiatives.

By incorporating work experience as a key element of their broader career pathways strategy, local workforce areas can help individuals gain valuable skills, connect with employers, and advance along their career paths more effectively.

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 parents lack high school diploma/GED

D. SINGLE-AREA STATE REQUIREMENTS

In States where there is only one local workforce investment area, the governor serves as both the State and local chief elected official. In such cases, the State must submit any information required in the local plan (WIOA section 106(d)(2)). States with a single workforce area must include—

1. ANY COMMENTS FROM THE PUBLIC COMMENT PERIOD THAT REPRESENT DISAGREEMENT WITH THE PLAN. (WIOA SECTION 108(D)(3).)

2. THE ENTITY RESPONSIBLE FOR THE DISBURSAL OF GRANT FUNDS, AS DETERMINED BY THE GOVERNOR, IF DIFFERENT FROM THAT FOR THE STATE. (WIOA SECTION 108(B)(15).)

3. A DESCRIPTION OF THE TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES AND SUCCESSFUL MODELS, INCLUDING FOR YOUTH WITH DISABILITIES. (WIOA SECTION 108(B)(9).)

N/A - we are not a single-area state

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

N/A we are not a single-area state

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

N/A we are not a single-area state

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.

N/A we are not a single-area state

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.

N/A we are not a single-area state

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.

N/A we are not a single-area state

E. WAIVER REQUESTS (OPTIONAL)

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

1. IDENTIFIES THE STATUTORY OR REGULATORY REQUIREMENTS FOR WHICH A WAIVER IS REQUESTED AND THE GOALS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, INTENDS TO ACHIEVE AS A RESULT OF THE WAIVER AND HOW THOSE GOALS RELATE TO THE UNIFIED OR COMBINED STATE PLAN;

2. DESCRIBES THE ACTIONS THAT THE STATE OR LOCAL AREA, AS APPROPRIATE, HAS UNDERTAKEN TO REMOVE STATE OR LOCAL STATUTORY OR REGULATORY BARRIERS;

3. DESCRIBES THE GOALS OF THE WAIVER AND THE EXPECTED PROGRAMMATIC OUTCOMES IF THE REQUEST IS GRANTED;

4. DESCRIBES HOW THE WAIVER WILL ALIGN WITH THE DEPARTMENT'S POLICY PRIORITIES, SUCH AS:

A. SUPPORTING EMPLOYER ENGAGEMENT;

B. CONNECTING EDUCATION AND TRAINING STRATEGIES;

C. SUPPORTING WORK-BASED LEARNING;

D. IMPROVING JOB AND CAREER RESULTS, AND

E. OTHER GUIDANCE ISSUED BY THE DEPARTMENT.

5. DESCRIBES THE INDIVIDUALS AFFECTED BY THE WAIVER, INCLUDING HOW THE WAIVER WILL IMPACT SERVICES FOR DISADVANTAGED POPULATIONS OR INDIVIDUALS WITH MULTIPLE BARRIERS TO EMPLOYMENT; AND

6. DESCRIBES THE 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 MOST RECENT DATA AVAILABLE REGARDING THE RESULTS AND OUTCOMES OBSERVED THROUGH IMPLEMENTATION OF THE EXISTING WAIVER, IN CASES WHERE THE STATE SEEKS RENEWAL OF A PREVIOUSLY APPROVED WAIVER.

N/A to all

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

The State Plan must include	Include
3. The State established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members;	Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2);	Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership;	Yes
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions;	Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7);	Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan;	Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency	Yes

The State Plan must include	Include
cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I;	
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 issued the Joint Final Rule in 2024, and state are only required to report baseline data in PY25 and PY26.

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 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	73.0%		75.0%	
Employment (Fourth Quarter After Exit)	74.0%		76.0%	
Median Earnings (Second Quarter After Exit)	7,100.0		7,500.0	
Credential Attainment Rate	73.0%		75.0%	
Measurable Skill Gains	55.0%		60.0%	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

In March 2024, the Department of Labor and the Department of Education issued the final rule, 89 FR 13814 (Feb. 23, 2024), defining Effectiveness in Serving Employers (ESE) as the percentage of participants with wage records who exit from WIOA core programs and were employed by the same employer in the second and fourth quarters after exit. Currently, Kentucky is collecting data for its baseline performance and will begin negotiating performance in PY27.

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 issued the Joint Final Rule in 2024, and states are only required to report baseline data in PY25 and PY26.

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 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	76.0%		78.0%	
Employment (Fourth Quarter After Exit)	76.0%		78.0%	
Median Earnings (Second Quarter After Exit)	8,500.0		9,000.0	
Credential Attainment Rate	72.0%		74.0%	
Measurable Skill Gains	70.0%		72.0%	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

[1]*In March 2024, the Department of Labor and the Department of Education issued the final rule, 89 FR 13814 (Feb. 23, 2024), defining Effectiveness in Serving Employers (ESE) as the percentage of participants with wage records who exit from WIOA core programs and were employed by the same employer in the second and fourth quarters after exit. Currently, Kentucky is collecting data for its baseline performance and will begin negotiating performance in PY27.*

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. In March 2024, the Departments issued the final rule, 89 FR 13814 (Feb. 23, 2024), defining Effectiveness in Serving Employers (ESE) as the percentage of participants with wage records who exit from WIOA core programs and were employed by the same employer in the second and fourth quarters after exit. Currently, states are only required to report baseline data in PY25 and PY26.

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 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	67.0%		69.0%	
Employment (Fourth Quarter After Exit)	70.0%		72.0%	
Median Earnings (Second Quarter After Exit)	3,800.0		4,000.0	

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Credential Attainment Rate	60.0%		62.0%	
Measurable Skill Gains	50.0%		52.0%	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

[1]*In March 2024, the Department of Labor and the Department of Education issued the final rule, 89 FR 13814 (Feb. 23, 2024), defining Effectiveness in Serving Employers (ESE) as the percentage of participants with wage records who exit from WIOA core programs and were employed by the same employer in the second and fourth quarters after exit. Currently, Kentucky is collecting data for its baseline performance and will begin negotiating performance in PY27.*

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 (CDO) currently staffs the provision of labor exchange services with merit staffing as well as Federally Funded Time Limited (FFTL) staff in 13 strategically located American Job Centers (AJCs) (i.e., the Kentucky Career Center) statewide. For a complete list, please visit https://kcc.ky.gov/Pages/Locations.aspx.

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

The Career Development Office is dedicated to ensuring professional development activities for employment service staff to ensure staff is able to provide high quality services to both jobseekers and employers.

Kentucky Labor Exchange

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. Kentucky Labor Exchange 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 Kentucky Labor Exchange training are provided to staff with job order writing responsibilities. Training takes place as determined by local office management.

Personal Professional Development Training

All staff can participate in personal professional development courses offered to the agency by a training system-MyPurpose. 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.

Program Specific Training

The Career Development Office provides program specific trainings to staff completing program specific responsibilities. Trainings for staff members to ensure they can deliver effective services to address customer needs are developed by the department and delivered upon onboarding and refresher training throughout the year.

Standard Operation Procedures

SOPs for all programs and staffing levels are currently being retooled for Career Development Office staff. Once completed, the SOPs and other information will be housed on the Education & Labor Cabinet's SharePoint. CDO is also in the process of developing a site where all these fundamental resources will be housed and made available to all staff.

Annual Training Advances

The Career Development Office provides routine training sessions with Regional Program Managers, Office Managers, and all staff to strengthen partnerships with other agencies and partners. Additionally, various topics are covered on how to best serve and upskill staff, while creating a robust toolkit for them to have readily available.

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

Process enhancements have been set in place between the Career Development Office (CDO) & UI to provide UI service in real time with a direct connection to centrally located UI staff.

The Kentucky Career Center webpage provides relevant information, including: UI FAQ's, individual claims assistance, Kentucky Career Center Offices and services available, filing an unemployment insurance claim, eligibility requirements, ID.me, helpful ID.me information, ID.me and mass layoffs, claimant guide, benefit weeks, current UI claimant populations (2024), eligibility determinations, weekly benefit amount (WBA), appeal hearing schedule, fact finding, work search requirements, overpayments, overpayment waivers, and 1099-G, and claimants rights and responsibilities.

Staff are provided onboarding training, as well as ongoing training to include:

- UI Annual Compliance
- Customer Service Training
- How to work with a Claimant (Step by Step process on working with a claimant)
- House Bill 4 Training
- Onboarding Training Part 1 and 2
- Workshare Training
- Class Codes Training
- Training for Contractors and COT (New Hires)
- DUA Training
- Training for Excellence
- One on one training in the local offices and departments both in-person and via virtual options (MS Teams)
- A series of three trainings provided for Central Office Staff included:
    - Part 1 Basic Unemployment
    - Part 2 Refresher UI and Customer Service Basics
    - Part 3 Advanced UI Training (Departmental breakdown of processes and procedures)

Additionally, staff are trained on core eligibility thresholds as seen below:

Core Eligibility Guidance as stated in the PAM 400:

- Eligibility is determined on a week-to-week basis, dependent on benefit requests.
- Individuals who are either totally unemployed or working less than full-time while looking for full-time work may file for benefits
- Claimants **exempt** from work searches during unemployment include the following:
    - People who are members of a union with a hiring hall
    - People who have a definite return to work date that is within 16 weeks of the date they filed for benefits
    - People who are in a labor dispute/strike with their employer
- Claimants must be unemployed through no fault of their own (Cannot have been discharged or voluntarily quit)
- People who are in approved training may file for benefits
- People who are **able** and **available** to work may file for benefits
- Ability **disqualifications** are as follows:
    - You have a medical condition that prevents you from accepting work
    - You are under the care of a physician who has not released you for work
    - You are seeking Social Security Disability and have certified that you cannot work
- Availability **disqualifications** are as follows:
    - You do not have adequate transportation to get to work or seek work
    - You do not have adequate childcare or dependent care while you work
    - You are on vacation or traveling and cannot accept work
    - You are not legally able to work in the United States
    - You have limited your hours of availability or the locations where you will accept work
    - You are enrolled in a school/training program that prevents you from working full-time
- Wages earned were during corresponding base period are **sufficient** to justify a claim

Base period wages qualifications are as follows:

- You must have wages of at least $1,500 in at least one quarter
- Wages during the base period must be at least 1.5 times the wages in your highest quarter

- Total wages outside of the highest quarter must be at least $1,500
- Wages in the last two quarters must be at least eight times your weekly benefit rate
- Kentucky-only claim (cannot file if another valid claim exists in another state)

Special Eligibility Thresholds (Still must abide by core thresholds).

(Interstate Claims) Claimants who live in another state may file for UI benefits if they have wages in Kentucky. If you live outside Kentucky, you must register for employment services with the state workforce agency in the state where you live. Proof of your registration must be submitted to the Kentucky Office of Unemployment Insurance within ten days of filing your claim

Military Claims:

- Base Period wages earned from service in the Federal Armed Forces may be used to establish a Kentucky UI claim. When filing the claim, you will be asked if you worked for the military in the last 18 months. If you worked for the military in the last 18 months, you will be asked to provide the Certificate of Discharge (DD Form 214) and Member 4. The Kentucky Office of Unemployment Insurance will contact your branch of service to request information about your wages. In addition to regular eligibility requirements, , you must have been discharged from military service under honorable conditions after completing your first full term of active service. You may be eligible for benefits if you were separated prior to the completion of your first term of service, but only if the reason for early separation is approved by the U.S. Department of Defense.

Federal Civilian Claims:

You may use wages earned during the Base Period from work for the federal government in a civilian or non-military position to establish a Kentucky UI claim. When filing your claim, you will be asked if you worked for the federal government in the last 18 months. If you worked for the federal government in the last 18 months, you must provide a copy of your Standard Form 50 (SF-50) “Notification of Personnel Action” and Standard Form 8 (SF-8) “Unemployment Compensation Form.” You should have received these forms from your federal civilian employer. If you do not have these forms, contact the federal agency where you were employed. The Kentucky Office of Unemployment Insurance will contact the federal government to request information about your wages. You will receive Monetary Determination by mail once the Kentucky Office of Unemployment Insurance receives your federal wage and separation information.

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

The website is utilized for all updates for customers. Social media is used to share information with customers. Emails are sent out regularly to existing customers. Press releases are sent to media outlets as necessary. For customers, UI staff provides expectation sheets to claimants while they are at a Kentucky Career Center. Additionally, customers receive an overview of the activities completed by staff and other services available through the Kentucky Career Center are shared. The utilization of grant allows for review and UI form updates to simplified plain language, which include forms that are simple with clear direction and video resources for UI specific subjects.

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

Kentucky Unemployment Insurance

The Federal-State (Kentucky) unemployment compensation (UC) program, (also referred to as the unemployment insurance [UI] program), created by the Social Security Act (SSA) of 1935, offers the first economic line of defense against the effects of unemployment. Through payments made directly to eligible, unemployed workers, it ensures that at least a significant proportion of the necessities of life, most notably food, shelter, and clothing—can be met on a week-to-week basis while a search for work takes place. As temporary, partial wage replacement to the unemployed, UC is of vital importance in maintaining purchasing power and in stabilizing the economy in times of economic downturn.

In addition to providing workers a much-needed safety net, the UC program provides employers the benefit of maintaining a trained workforce in the local labor market, available to return to work when needed. The UC program operates counter-cyclically, paying out higher levels of benefits during recessionary times and recouping those higher costs during recovery periods. Most workers are covered by UC under state or Federal UC laws. It is noted by the U.S. department of Labor-Employment and Training Administration. That states are responsible for administering their individual state UC programs, and they act as agents of the Federal government in administering certain Federal UC programs (discussed below) under agreements with the Secretary of Labor.

Each state has its own set of eligibility requirements based on federal law. Your benefit amount here in Kentucky is based on how much money you made during a specified period, as reported by your employer. Workers do not pay into the UI program. UI benefits come from employer taxes and are never deducted from a worker's paycheck. Employers are notified when you file a claim and are asked to provide information.

However, all eligibility decisions are made by the Office of Unemployment Insurance. Eligible individuals may receive between 16 and 24 weeks of UI benefits during one benefit year. The duration of benefits depends upon the State Average Unemployment Rate at the time of filing. Traditional UI benefits are paid every other week. The maximum benefit amount is $720 per week.

To be eligible for benefits you must:

(1) Be unemployed or working less than full-time

(2) Have earned enough money to establish a valid claim

(3) Be unemployed through no fault of your own

(4) Be able to work, available for work, and looking for work

Upon request for unemployment insurance, an "expectation sheet" is discussed with the client. It provides education on all services offered – sample of the form BELOW:

Customer Name :_____
Date:_____

Today's Experience:

We are glad to have the opportunity to work with you on resolving your unemployment issues. Some of the issues take more time than others, so please be patient while we make the necessary adjustments to your claim. Your meeting/ appointment today will give us a better understanding of what is needed to resolve your pending issues.

Please Remember:

• Your claim is unique and different from anyone else's claim

• Most of your issues can be resolved in 7-10 days.

• If we have a delay in the resolutions of your claim we will contact you via phone, or email.

• If you have any questions about Kentucky's unemployment insurance process, you have access to the Claimants Guide: Your Rights and Responsibilities When Claiming Unemployment.

• Insurance Benefits that you received while filing your claim.

• The KCC.KY.GOV website is a great resource for you.

• Your Rights and Responsibilities on the KCC.KY.GOV

Kentucky Career Center Representative:

_____

Action Items/Comments:

_____

_

The Kentucky Career Center can:

- assist you in finding job openings.
- screen and test you for jobs that match your skills.
- fund eligible on-the-job training and customized training needs.

- arrange space for job interviews, and in some areas, schedule interviews via video conferencing.
- provide access to detailed labor market information for the local area, Kentucky, and the nation.
- provide services to help both employer and employees when facing layoffs or other major issues
- Offer Unemployment Insurance information and make connections with Vocational Rehabilitation services (for people with disabilities) and services for the Blind.
- If you're a Veteran, we offer Priority of service and access to a Veteran Representative.

UI's Work Search requirements

The Kentucky General Assembly enacted changes to the state's unemployment insurance program during the 2022 regular session through House Bill 4 after overriding Governor Beshear's veto of the bill.

Work search activities and job contacts can include, but are not limited to, any of the following examples:

Formal Job Application

Examples: Copy of application confirmation from website or submission email, copy of application email sent to employer, copy of fax application confirmation, copy of your completed paper application, legibly signed, and dated by employer or Kentucky Career Center staff, screenshot of text message showing application submission

Job Interview

Examples: Documentation of interview scheduling, form letter signed by employer

Job Shadowing

Examples: Form letter to be completed by employer, includes dates/hours/etc.

Job Fair or Networking Event

Examples: Business card from participating employer, form letter signed by participating employer or KCC staff

Job Search Skills Workshop or Seminar

Examples: Email and/or certificate from Kentucky Career Center staff, form letter signed by the presenter to certify participation, screenshots from online participation

Employment Search Program through Kentucky Career Center or partner

Examples: Confirmation of registration in KEE Suite, documentation of job referral email, form letter signed by program staff to certify participation, screenshots from online participation

Educational Awareness with 2023 Law changes. Grant allowed for several projects to enhance user experiences.

Project 1 - Language Simplification & User Experience Enhancements

This project will focus on two primary workstreams that will improve the readability to target low literacy adults or English-as-second language (ESL). This will assist those individuals with understanding the requirements and details of their claims. The first workstream will simplify language across all claimant-facing mediums. The second workstream will improve the accessibility and ease-of-use experience of the OUI website and UI application and establish a self-service portal for claimants to check the status of their claim. Improvements will be made using Behavioral Insights and Human-Centered design best practices.

The Kentucky Office of Unemployment Insurance (OUI) offers Unemployment Insurance (UI) related information to claimants, employers, and other stakeholders via a wide range of communication touchpoints, such as the KY OUI website, the UI application and call center, the Unemployment Insurance Handbook for Claimants, official letters or other mailers. These resources are sometimes available in web/online, telephone, printed, or PDF formats.

OUI letters, forms, the Unemployment Insurance Handbook for Claimants, webpages, and other touchpoints for communicating with claimants and employers often contain complex instructions, legal jargon, or are too lengthy, dense, or complicated for a claimant or employer to quickly and easily understand what is required of them.

KY OUI leadership is committed to the use of plain language and has expressed a commitment to implementing plain writing principles in all written communications. UI will support the plain writing initiative by communicating; the importance of using plain language; best practices and helpful tips; leadership's interest in and support of plain writing; and training opportunities (within and outside of the Agency).

Link to the Federal Plain Language Website and Guidelines:

https://www.plainlanguage.gov/law/

Plain Language best practices will help claimants with:

- Finding what they need
- Understanding what they find
- Using what they find to meet their needs

Each project will be scalable with funding. First reviewing start date of project, staffing resources, materials, and then outcome metrics.

Project 2 - Proactive Mobile Friendly Communications & Customers Experience

Numerous regions of Kentucky have limited access to broadband internet, this presents concerns regarding equitability and access. By communicating status updates on their claims more proactively, OUI may greatly improve their effectiveness reaching these communities, increase transparency and trust with claimants and drive better mission outcomes. Additionally, these notifications will also impact call center operations and administrative burden resulting from duplicate UI filings.

- Lower wait times – avg wait time for the past 10 months is 78 minutes.
- Decrease of repeat phone inquiries for unique claimant to determine quality services. Track through Amazon Web Services (AWS). AWS is the phone system KY OUI uses to route claimant phone calls. This system can track metrics related to hold times, handle times, queue times, numbers of contacts, handled and transferred. Our goal is to cut average wait times under 40 minutes.

Customer Service Experience

The growing number of customer communication channels make it difficult to maintain a consistent quality of customer experience across the board. Automating customer notifications helps maintain a level of consistency that is not possible when individual agents handle the work. Using recorded voice messages or standard text messages helps improve the customer experience and makes it easy to fine-tune content based on customer feedback or other results.

What are the barriers experienced? Current self-service system does not provide real-time clear and enough milestone/status updates on claims post submission. Due to this, UI claimants are unable to readily find the status of their claims. This inability represents a significant pain-point for eligible claimants resulting in issues related to accessibility, particularly in regions with limited broadband access.

What is the detailed description of the project? To remedy this issue and reduce the operational burden on OUI call centers, it is recommended that OUI set up automated push notification and status updates to claimants that inform them of the status of their claim. These notifications may be conditional and associated with key milestones or predefined durations in time.

In addition to an email notification, it is also recommended that OUI also send notifications via an SMS text message to increase the likelihood a claimant would see the message immediately instead of waiting until they sign onto email. This would be particularly valuable for low-income households with annual incomes of less than $30,000 per year as only 59% have access to a desktop or laptop computer and 76% have access to a smartphone device.

Creating a real-time notification process will also affect all claimants in the system. Receiving notifications as they happen will allow claimants to respond with the documents needed 1 – 2 days faster, reducing processing time for OUI and ultimately enabling claimants to receive payment sooner.

Claimants that are unable to receive or chose not to receive messages may seek in-person or direct phone services in the 13 local offices around the Commonwealth and the dedicated call center in the main office building.

Established best practice fraud prevention procedures will run parallel to, and in conjunction, with all user experience enhancements.

Each project will be scalable with funding. First reviewing start date of project, staffing resources, materials, and then outcome metrics.

Project 3 - UI Connect Mobile Vehicle Services

Procurement of a UI Connect Mobile Vehicle and establish KY OUI team members to regularly travel to designated areas to assist underserved communities and disaster recovery with all direct and related UI activities.

UI Mobile Services to include for customer experience:

- Assist with filing a UI claim and set-up of identity verification
- Request Bi-weekly Benefit Payments
- Complete your eligibility review
- Reset your pin
- Change payment method
- Change your mailing address
- Change your email address
- Report Fraudulent claims

Project Timeline:

1. A project manager was hired in August 2022 to oversee the project
2. In September 2022, a team was assembled to conduct research and development on various mobile units. As part of the research, a visit to a specialty vehicle dealership to view products was conducted.
3. Submission of required paperwork to our fiscal department for procurement of a purchase request (RFP-Request for Purchase), including a detailed list of required items needed for the mobile unit, is being compiled for submission in the Fall.

4. The RFP was closed on December 23, 2022, which included a detailed listing of requested items. Vendor responses were sent to the two-person evaluation team, which will render a decision on chosen vendors in the first quarter of 2023. The responsibility of the evaluation team is to review responses to make sure mandatory requirements are met. Additional vendor information, such as financial quotes will be forthcoming in the first quarter of 2023.
5. 1/13/23 (completed required SPR1)
6. 2/16/23 (Received draft contract)
7. 3/10/23 (Contract fully complete and signed)
8. 3/21/23 (submitted amendment request to extend period of performance and increase purchase to $600k)
9. 3/31/23 (continue communications with ETA representatives to amend this project – waiting for approvals)
10. 5/12/23 (received notice of award to amend the period of performance to 3/31/2025).
11. 6/12/23 (received email status update from manufacturer saying the chassis is still pending but on schedule).
12. 8/1/23 (received email from manufacturer saying chassis is scheduled to be delivered in January 2024 which puts us on schedule for assembly to begin in March 2024.

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;

When UI claimants enter the career center, they are provided additional Employment and Labor Exchange Services and can be co-enrolled into Wagner-Peyser. When assisting UI claimants, career center staff provide Wagner Peyser services and assessments to determine attainable career goals. Staff utilize programs such as National Labor Exchange (NLX) and ONET Online to develop ideal career paths and tailor specific information and support for each UI claimant individually based on their interests, education and experience. This also includes additional education and training pathways

Additionally, staff have a basis of understanding of both CDO and UI functions, how they are both critical to the success of the customer we are serving (jobseekers and employers), and how they are integrated together.

Field staff are able to directly engage with customers to coordinate and provide labor exchange services for UI claimants during their visit to the career center. Through the use of the National Labor Exchange (NLx) System and business services teams, who are connected to the local area economy, a connection

can be made with a job-seeker. This can include, but is not limited to, UI assisted services, fielding claimant questions, work search requirement assistance, verification and documentation, job preparation workshops, referrals to partnering agencies as needed, and other supportive services.

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

Currently, registration in a CDO system is not required by State law as can be seen in KRS 341.350click here.

However, the work search requirements encourage connectivity. Kentucky Career Center staff directly engage with customers to coordinate and provide labor exchange and Employment Services for UI claimants when they visit or reach out to the Kentucky Career Center for UI assistance. While state law does not require UI claimants to be registered on the state labor exchange, it is encouraged. Additionally, the Kentucky General Assemble made changes to the state's unemployment insurance program during the 2022 regular session.

The Work Search Requirements 2023 Updates are listed below and can be found here under claimant guide.

Work Search Activities

To be eligible for Unemployment Insurance benefits, you must actively seek full-time work. The Kentucky General Assembly made changes to the state's unemployment insurance program during the 2022 regular session. These changes included updates of work search requirements for Unemployment Insurance claimants. Prior to January 1, 2023, claimants had to make one job contact per week. As of January 1, 2023, claimants must report at least five (5) work search activities each week. At least three (3) of these must be job applications or interviews.

If you do not meet the work search requirements, you will lose benefits for the week(s) being claimed.

Work Search Activities	
At least 3 per week must come from this category (out of 5 total):	Remaining activities (out of 5 total):
• Formal Job Application (in person or online) • Job Interview (in person or online)	• Job Shadowing • Job Fair or Networking Event- (hosted by a state/local government or business organization) • Participating in a Kentucky Career Center program (or partner programs) training related employment or job search

Work Search Exceptions

Only claimants with a Work Search Exception are exempt from seeking work. You are not required to conduct a job search if:

- You are a member of a trade union that finds work for you
- You are a student in an approved training program (and have received a determination)
- You have a definite recall date within 16 weeks of your initial claim filing date
- You are on temporary leave of absence while still considered an employee
- Your employer filed a mass electronic claim (E-Claim) on your behalf

To verify that you meet these criteria, you will be instructed to provide documentation when you file the claim**. If you do not provide documentation, you will be subject to work search requirements.**

Claimants in an Approved Training Program, and who are making satisfactory progress in that program, may receive up to 5 additional weeks of benefits (maximum 24 weeks). See the eligible trainer provider list for more information on available training programs.

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

Eligibility assessments for referral to UI adjudication

Field staff assesses and determines if UI claimants' cases are in need of adjudication as needed and, as dictated by the claimants' needs. Processes have been set in place between staff of the Career Development Office (CDO) & UI to provide daily UI adjudication issues from the field to the UI Adjudication branch. Additionally, assessment, at its basic threshold, is conducted each time a claimant requests benefits. Questions asked are centered around core eligibility requirements (work searches, ableness and availability to work, sufficient income to benefit ratio, etc.). If a claimant fails to meet these requirements, their claim goes under investigation to determine eligibility. Adjudication will review their claim to ensure UI parameters are met. If a claimant is remiss in these parameters, the claimant will be disqualified from benefits. The claimant will then have to appeal the disqualification through the appropriate channels. This can be as simple as verifying ID to providing proof wages and so forth. If necessary, a disqualification may have to go through Appeals where a hearing will be scheduled to determine eligibility. This can carry further up the legal system if necessary.

Job Finding and Placement Services

Field staff directly engage with UI claimants to coordinate and provide labor exchange services for UI claimants while receiving UI assistance at the career center. This includes, but is not limited to, work

search assistance, job preparation workshops, referrals to partnering agencies as needed, and referrals to businesses and hiring managers. Additionally, the Business Service Team (BST) is available with relevant and verifiable job openings for job finding and placement services for UI claimants.

Work search activities and job contacts can include, but are not limited to, any of the following examples:

- **Formal Job Application -** *Examples: Copy of application confirmation from website or submission email, copy of application email sent to employer, copy of fax application confirmation, copy of your completed paper application, legibly signed, and dated by employer or Kentucky Career Center staff, screenshot of text message showing application submission*
- **Job Interview -** *Examples: Documentation of interview scheduling, form letter signed by employer*
- **Job Shadowing -** *Examples: Form letter to be completed by employer, includes dates/hours/etc.*
- **Job Fair or Networking Event -** *Examples: Business card from participating employer, form letter signed by participating employer or KCC staff*
- **Job Search Skills Workshop or Seminar -** *Examples: Email and/or certificate from Kentucky Career Center staff, form letter signed by the presenter to certify participation, screenshots from online participation*
- **Employment Search Program through Kentucky Career Center or partner -** *Examples:* Confirmation of registration in KEE Suite, documentation of job referral email, form letter signed by program staff to certify participation, screenshots from online participation.

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

An Expectation Sheet is provided when services occur within the Kentucky Career Center. Website resources and social media are used to share training opportunities to the wider community. Additionally, while assisting UI claimants, field staff assess, make recommendations and provide referrals to partnering agencies as needed for both short and long-term training and education programs. Partnering agencies include local WIOA representatives, training providers, and other educational program providers. As each claimant is assisted as an individual, the referral process differs for each. However, the referral processes involve warm-handoffs, information gathering and dissemination, utilization of state issued technology systems, and introductions (virtual, phone, email, and in-person).

As each claimant is assisted as an individual, the referral process differs for each individual, and the referral processes are conducted and tailored to the customer's needs. However, a basic referral process includes:

- An initial assessment

- Fact finding of career advancement needs (training/education needs)
- Barriers to successful employment
- Individual Employment Plan
- Referral to identified partners & programs as needed to include:
    - introductions via:
        - in-person
        - virtual
        - phone
        - email
- Case management services to provide:
    - Employment Services
        - Career based workshops
            - Resume writing
            - Dress for success
            - How to interview
            - Soft skill building
            - Kentucky Career Center Orientation
                - Orientation of available partners and services to job seekers
        - Job finding and placement services
    - Routine follow-up services to monitor career growth

Additionally, an expectation sheet is provided to all job seekers. The expectation sheet is a supplemental resource when a job seeker is meeting with a staff member to provide awareness of available services and activities in the center.

EXPECTATION SHEET

Customer Name: _____ **Date:** _____

Today's Experience:

We are glad to have the opportunity to work with you on resolving your unemployment claim problems. Some of the issues take more time than others, so please be patient while we make the necessary adjustments to your claim. Your meeting/appointment today will give us a better understanding of what is needed to resolve these pending issues.

Please Remember:

- Your claim is unique and different from anyone else's claim.
- Most of your issues can be resolved within 7-10 days.
- If we have a delay in the resolution of your claim, we will contact you via phone or email.
- The insurance benefits that you received while filing your claim.
- If you have any questions about Kentucky's unemployment insurance process, you have access to
  "The Claimants Guide: Your Rights and Responsibilities When Claiming Unemployment."
  This document can be found at: https://kcc.ky.gov/career/Documents/PAM400.pdf.
- The KCC.KY.GOV website is great resource. You can access your unemployment claim, find information to assist with work search, and learn about other services available from Kentucky Career Center partners.

Kentucky Career Center Representative: _____

Action Items/Comments: _____

The Kentucky Career Center can:

- Assist you in finding job openings.
- Screen and test you for jobs that match your skills.
- Fund eligible on-the-job training and customized training needs.
- Arrange space for job interviews, and in some areas, schedule interviews via video conferencing.
- Provide access to detailed labor market information for your local area, other areas of Kentucky, and all other states & territories.
- Provide services to help both employer and employees when facing layoffs or other major issues.
- Offer Unemployment Insurance information and make connections with Vocational Rehabilitation services (for people with disabilities) and services for the Blind.

- If you're a Veteran, we offer Priority of service and additional opportunities.

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 state of Kentucky have unique needs of finding employment outside farm work and meeting their training needs. Currently the Commonwealth of Kentucky offers services to MSFW through the 13 certified Comprehensive 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 desired by today's employers. Training is generally provided through the Career Center or the partners' network. Partners included but not limited to are: KCTCS, WIOA, OVR, and Kentucky Farm 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

The 2025 Feeding the Economy report continues to show that the U.S. food and agriculture sector is a foundational pillar of American culture and commerce. These industries directly support over 24 million jobs (15% of U.S. employment) and are responsible for more than $9.5 trillion of the country's economic activity – about one-fifth of total U.S. output. The Kentucky Department of Agriculture reports Kentucky agricultural cash receipts were $8.1 billion in 2023, just shy of the all-time high of $8.3 billion set the year prior. That number reflects just a portion of the overall estimated $49.6 billion impact agriculture has on Kentucky's economy, making it evident that Kentucky needs agriculture. Kentucky's top five commodities all exceeded $1 billion in cash receipts during that record-breaking year, as well. This diversification marks a significant turning point in Kentucky's agriculture future. The

USDA reports that in 2022, the Commonwealth of Kentucky producers hired 40,464 farm workers, and 5,090 migrant workers

In 2022, the top five commodities in the Commonwealth of Kentucky (see Chart 1 below) included corn, broilers, soybeans, and other animals, including horses and cattle/calves. In 2022, the top five agricultural exports in the Commonwealth of Kentucky (see Chart 2) included horses (other livestock), soybeans, corn, tobacco, feeds, and other grains. According to the USDA, in 2022, Kentucky's agricultural cash receipts totaled $9.922 billion.

[Source: USDA-NASS Economic Research Service Kentucky Fact Sheet and Census of Agriculture]

Chart 1

Top Five Commodities by Sales Receipts in 2022:	
Corn 7 billion	$1.44
Broilers 7 billion	$1.42
Soybeans 2 billion	$1.39
All other animals/products (including horses)	$1.224 billion
Cattle and Calves	$1.101 billion

[Source: USDA-NASS Economic Research Service Kentucky Fact Sheet and Census of Agriculture]

Chart 2

Top Five Agricultural Exports	
Horses (other livestock) million	$789.3
Soybeans 7 million	$766.
Corn million	$303.3
Tobacco million	$257.6

Top Five Agricultural Exports	
Feeds and other feed grains	$229 million
Total exports:	$3.29 billion

[Source: USDA-NASS Economic Research Service Kentucky Fact Sheet and Census of Agriculture]

The net farm income in Kentucky rose from $3,235,538,000 in 2022 to $4,117,607,000 in 2023, according to the USDA Farm Income and Wealth Statistics. The gross cash income for all commodity receipts totaled approximately $9.9 billion, according to the USDA-NASS Economic Research Service Kentucky Fact Sheet and Census of Agriculture.

Kentucky Agriculture Cash Receipts in 2022:	
Animals & products	$4.467 billion
Crops	$3.8 39 billion
Farm-related income	$2.116 billion
Total Farm Income	$9.922 billion

[Source: USDA-NASS Economic Research Service Kentucky Fact Sheet and Census of Agriculture]

The Commonwealth of Kentucky has remained consistent with its top five commodities for over a decade, with only the output of each determining their ranking. This is not an indication of stagnation, but rather, it provides a pattern of labor-based needs in the State. Due to the fluctuation of the timing of crops and commodities, farm workers in the Commonwealth of Kentucky often need to find employment outside farm work and/or meet their training needs. MSFW and agricultural employer services are guided by the State Monitor Advocate, who is knowledgeable about the state workforce system. The Participant Individual Record Layout (PIRL) reports for July 1, 2023 - June 30, 2024, indicate 107 MSFW total participants served, and 70 total participants exited, for July 1, 2024 - June 30, 2025, indicate 84 MSFW total participants served, and 51 total participants exited.

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

Recognizing the importance of MSFW outreach, DWD has offered two trainings, establishing a commitment to annual trainings. The first of these trainings occurred on October 18, 2024, and the second on August 20, 2025. This commitment reinforces a genuine desire to enhance our current practice as we await a response to our staffing plan request. Additionally, DWD has taken the time to conduct a thorough review of the complaint process.

The current, locally based complaint system process presents limitations that hinder efficiency, consistency, and accessibility. Manual submission and routing of complaints requires significant administrative effort, increases the potential for delays, and creates challenges in ensuring accurate tracking and timely resolution. Furthermore, the reliance on local staff for intake and handling of complaints can lead to variations in process execution and outcomes as well as difficulty in maintaining statewide consistency.

A centralized online complaint system will modernize and streamline this process. By allowing individuals to file complaints electronically, the system will remove access barriers and create a more user-friendly experience. Complaints will be automatically routed to a central unit for standardized processing, ensuring timely, consistent, and equitable handling across the state. The online system will also enable secure, centralized storage of documentation, improve compliance with retention requirements, and provide robust reporting capabilities to monitor trends and identify systematic issues.

Under this model, local staff will continue to play a critical role in supporting the public. They will be available to provide guidance, answer questions, and assist individuals in navigating the online system as needed. However, they will no longer be responsible for receiving, processing or adjudicating complaints within their offices. This shift will reduce the administrative burden on local staff, allowing them to focus more fully on direct service delivery, while ensuring that all complaints are addressed in a consistent and timely manner by the central office.

Transitioning to a centralized online complaint system will create a more efficient, user-friendly, and transparent process. An online platform will allow individuals to file complaints quickly and easily from any location, reducing barriers to access. Automated workflows will ensure that complaints are immediately routed to the appropriate path, minimizing delays and improving accountability. Centralized processing will also provide staff with standardized tools for tracking, managing, and resolving complaints, leading to greater consistency and fairness in outcomes. Moreover, the online system will enable real-time data collection and reporting. This capability will allow leadership to

monitor trends, identify systematic issues, and evaluate program effectiveness, functions that are difficult or impossible under a paper process. It will also improve compliance with record keeping and retention requirements by ensuring secure, centralized storage of all complaint documentation. Additionally, these staff will be provided professional development activities to include, but not limited to: shadowing and being mentored by tenured team members during site visits where MSFW's gather, online & in-person farmworker organization hosted conferences such as: Eastern Kentucky Farmer Conference, OAK Annual Conference, Annual AG Expo, the Kentucky State Fair, and Kentucky Farm Bureau Conferences, complaint system training & familiarization, trade shows related to agricultural employment, among other events and trainings as deemed relevant and necessary.

Staff will also utilize WorkforceGPS for guidance such as: Agricultural Connection Community, Acquiring Workers for Agricultural Jobs Through the Agricultural Recruitment System, Agricultural Upgrade Training with National Farmworker Jobs Program (NFJP), State Monitor Advocate System, Monitor Advocate System Performance Reporting, Evaluation of the H-2A Alien Labor Certification Process and the United States Farm Labor Marker, as well as others as deemed necessary and relevant.

During the peak seasons, Kentucky has approximately 9,000 Visa workers, and 5,090 seasonal and migrant workers. Mexico is the predominate country of origin of the MSFW in Kentucky, and most of these workers speak and read **Spanish.**

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:

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

The KCC has designated staff members who provide MSFW outreach as needed and required. This staff has also received training in KCC services, the use of the complaint system, and services available from other community and state agencies. However, the Commonwealth is currently exploring viable options to utilize statewide staff to the MSFW population. The outreach staff will convey the services available at the KCC's (referrals to training, supportive and career services, specific employment opportunities, information on the Employment Service & Employment-related Law Complaint system, other organizations serving MSFW's, farmworkers rights). Additionally, these staff will be provided professional development activities to include, but not limited to: shadowing and being mentored by tenured team members during site visits where MSFW's gather, online & in-person farmworker organization hosted conferences such as: Eastern Kentucky Farmer Conference, OAK Annual Conference, Annual AG Expo, and Kentucky Farm Bureau Conferences, complaint system training &

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Because this population is so transient, outreach to the Migrant Education Program could be a source to contact additional farmworkers. The Kentucky Department of Education (KDE) is a longstanding partner of the Department of Workforce Development, through that partnership, outreach to the MSFW population continues to develop. DWD leverages the programs of KDE to reach the MSFW population. Migrant Student Records Exchange Initiative (MSIX) technology allows states to share educational and health information on migrant children who travel from state to state and who as a result, have student records in multiple states' information systems. MSIX works in concert with the existing migrant student information systems that states currently use to manage their migrant data to fulfill its mission to ensure the appropriate enrollment, placement, and accrual of credits for migrant children nationwide. Migrant Education is a federal entitlement program designed to provide supplementary education and human resources services to highly mobile children up to and through age 21. Eligibility for the program is determined by the lifestyle of the parents/guardian (i.e. moving across school district, county, or state boundaries for the purpose of seeking or obtaining temporary or seasonal work in agriculture or commercial fishing activities). Children must move with the parent/guardian or join the parent/guardian within 12 months of a qualifying move. Children who are determined to be eligible may remain eligible for up to 36 months without another qualifying move. The mission of the migrant program is to provide educational and human resource service opportunities that strengthen and enhance the development of the migrant child and the migrant family. The migrant program focuses primarily on the educational needs of the migrant child and attempts to alleviate barriers to successful educational achievement. 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, Kentucky Career Portal, which helps develop a resume and track job leads online.

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.

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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

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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

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E. COORDINATING OUTREACH EFFORTS WITH NFJP GRANTEES AS WELL AS WITH PUBLIC AND PRIVATE COMMUNITY SERVICE AGENCIES AND MSFW GROUPS

The KCC and the Kentucky MSFW program collaborate and partner with the Kentucky Farmworker-National Farmworker Jobs Program (NFJP) grantee, MET, Inc. to employ farmworkers throughout Kentucky in full-time employment outside agriculture and high-paying jobs within agriculture. MET is dedicated to enhancing the well-being of children through comprehensive family support services. The organization offers child and family development programs to over 1,600 infants, toddlers, preschoolers, and their families, across 6 states. Recently Kentucky was added to their state roster. MET's experienced team of professionals is committed to fostering positive, lasting change. While their impact spans wide, MET maintains a strong focus on each child, delivering high-quality services that nurture the entire family's well-being. As part of MET's coordinated efforts to help individuals become excellent parents,

their family support services aim to promote healthy family dynamics. They are primarily funded by the Texas Department of Health and Human Services, along with programs like Texas Home Visiting, Project-HOPES, Partnership for Thriving Families, Help Me Grow, Thriving Texas Families, and services for Service Members, Veterans, and families, MET works to improve prenatal care, reduce preterm labor, enhance child nutrition, prevent child abuse and neglect, provide school-readiness services, and family stability programming.

The Kentucky MSFW program also partners with Migrant Education and migrant health programs to provide needed services to the MSFW participants.

KCC services are available to all MSFW participants to provide job seekers with individualized employment services, including resume writing, interviewing techniques, and job application completion. These services are available both in-person and virtually. There are also various options available on the KCC webpage: https://kcc.ky.gov. The Kentucky Labor Exchange is available to search for employers seeking qualified job seekers. As the majority of MSFWs communicate in languages other than English, the KCC partners with Interpretalk to provide services and to encourage MSFWs to utilize the resources available to them through the one-stop system.

The KCC also collaborates extensively with numerous partners, including but not limited to the Kentucky Community & Technical College System (KCTCS), and other state universities that offer educational information and training for agricultural employment, including the University of Kentucky, Berea College, Eastern Kentucky University, Murray State University, Western Kentucky University, and others, the Workforce Innovation & Opportunity Act (WIOA) partners, the Office of Vocational Rehabilitation (OVR), Kentucky Farm Works Program, National Farmworker Jobs Program (NFJP), Experience Works program, training through the Senior Community Service Employment Program (SCSEP) to low-income older workers throughout 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

i. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers

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 web-based programs, like Coursera, Ready For Industry, Worldwide Interactive Network (WIN) Career Readiness System and Citizen Connect which helps learners attain certificates and credentials, develop a resume and track job leads online. Staff members of the Kentucky Career Center are located throughout the state to assist as needed.

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—web-based programs, like Coursera, ready for industry, win, and citizen connect which helps learners attain certificates and credentials, develop a resume and track job leads online. Staff members of the Kentucky career center are active in the regional business service teams and have web-based program, focus talent which allows employers to search online for qualified candidates are located throughout the state to assist as needed.

B. MARKETING THE EMPLOYMENT SERVICE COMPLAINT SYSTEM TO FARMWORKERS AND OTHER FARMWORKER ADVOCACY GROUPS

ADMINISTRATIVE REVIEW PROCESS FOR MIGRANT SERVICES COMPLAINTS

The Agency shall follow the guidelines as predetermined by the U.S. Department of Labor when a complaint is submitted by a migrant seasonal farm worker (MSFW) employed through the H-2A visa program under the complaint system for the Wagner-Peyser Act Employment Service.

Whenever an individual indicates an interest in filing a complaint with the Employment Services (“ES”) office, the individual receiving the complaint shall comply with 20 C.F.R. Sec. 658.411. In the instance where an informal resolution at the local level is not reached, the ES must refer the complaint to the appropriate enforcement agency for prompt action.

If the appropriate enforcement agency determines that the employer has not violated ES regulations, the agency must notify and offer to the complainant the opportunity to request a hearing within 20 business days after the certified date of receipt of notification.

Hearing and appeals process:

Pursuant to 20 C.F.R. Sec. 658.417-18, if the ES receives a request for a hearing within 20 business days after the receipt of notification, it shall be referred to a State Hearing Official. All decisions of a State Hearing Official must be accompanied by a written notice informing the parties that they may appeal the decision within 20 business days of the certified date of receipt of the decision. Pursuant to KRS 13B.020(4), the State Hearing Official must comply with federal law and regulations. The State Hearing Official’s decision shall be the final state-level decision.

A party may appeal the final decision of the State Hearing Official in writing with the Regional Administrator pursuant to 20 CFR 658.418(c).

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).

The roles and responsibilities of outreach workers are to:

- Contact and locate MSFWs where they live, gather, or work.
- Observe the working and living conditions.
- Explain all available service.
- Refer to job openings and supportive services.
- Explain basic farmworker rights when the MSFW is referred to a job.
- Assist in making appointments and
- Provide all information relating to the job service complaint system and assist in the preparation of a worker complaint.

The KCC and the Kentucky MSFW program collaborate and partner with the National Farmworker Jobs Program (NFJP) grantee, MET to employ farmworkers throughout Kentucky in full-time employment outside agriculture and high-paying jobs within agriculture. MET Inc is dedicated to enhancing the well-being of children through comprehensive family support services. The organization offers child and family development programs to over 1,600 infants, toddlers, preschoolers, and their families, across 6 states. Recently Kentucky was added to their state roster. MET’s experienced team of professionals is committed to fostering positive, lasting change. While their impact spans wide, MET maintains a strong focus on each child, delivering high-quality services that nurture the entire family's well-being. As part of MET's coordinated efforts to help individuals become excellent parents, their family support services aim to promote healthy family dynamics. Primarily funded by the Texas Department of Health and

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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.

Public Comment Received:

The Agricultural Outreach Program (AOL) is a great partner to the Western Kentucky Regional Migrant Education Program. As we work with farm workers who are here to work utilizing H-2A contracts, and their employers, understanding the contracts is key, and Mr. Jeff Gatewood is always willing to answer questions our recruiters may have. When a farmworker who qualifies for our program has an issue, the relationship that ease in communication facilitates has allowed us to easily notify someone when something isn't going as it should and guide the farmworkers and their employers to a solution quickly. The guidance provided is key in our ability to present a valuable resource.

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.

The Kentucky Monitor Advocate System ensures that Migrant and Seasonal Farmworkers (MSFWs) receive employment services comparable to those provided to non-MSFWs. This is achieved through compliance with Wagner-Peyser Act regulations and monitoring key service indicators.

Key Performance Indicators (KPIs): The Monitor Advocate System is measured using the following Key Performance Indicators, aligned with WIOA standards:

- Employment Rate (Q2 Exit): percentage of MSFW program participants employed in unsubsidized positions during the second quarter after program exit.
- Employment Rate (Q4 Exit): percentage of MSFW program participants employed in unsubsidized positions during the fourth quarter after program exit.
- Median Earnings (Q2 Exit): Median earnings of MSFW program participants employed in unsubsidized positions during the second quarter after program exit.

Core System Components & Considerations:

- Eligibility & Participation: MSFW definitions and eligibility criteria align with established regulatory guidance.
- Participant Tracking: Kentucky accurately monitors unique MSFW participant counts, integrated within the Workforce Integrated Performance System (WIPS).
- Data-Driven Reporting: Service level and performance metrics are tracked and reported through the Title III Employment Service WIPS submissions.
- Transparent Reporting: Kentucky submits annual reports via the Labor Exchange Agricultural Reporting System (LEARS) and quarterly narrative reports detailing services provided to MSFWs.

- Data Privacy & Security: Although Social Security Numbers (SSNs) may be used for performance reporting, program eligibility, and service delivery, they do not require SSN disclosure, and SSNs are not used as unique identifiers.

Standards for Service Delivery:

- Comparable Access: Kentucky adheres to established guidelines, ensuring MSFWs receive access to core employment services, including job referrals, job development support, and referrals to supportive service programs.

- Minimum Service Level Achievement: Kentucky is designated as an MSFW Significant State and is required to meet a minimum of four out of seven designated service level indicators. All states are strongly encouraged to meet all indicators to ensure service quality.

Performance Targets:

To achieve program compliance, the following performance targets are established:

- Employment Parity: MSFW job placement and earnings outcomes must be on par with the outcomes of the general (non-MSFW) Wagner-Peyser program population.

- One-Stop Center Reviews: 100% of Kentucky Career Centers are to undergo regular review processes.

- Agricultural Recruitment System (ARS) Field Checks:

    - A minimum of 25% of ARS field checks are completed when 10 or more job orders have been placed.

    - 100% completion of ARS field checks is completed when nine or fewer job orders have been placed.

- Outreach Activities: A minimum of 40 outreach contacts per week must be documented.

- Complaint Resolution: 100% of formal complaints must be processed and resolved in a timely and effective manner.

The goal is to provide MSFWs with proper access to and benefits from workforce development services, thereby promoting their economic self-sufficiency and stability in the labor market. This involves assessing Kentucky data from the Performance Monitor Advocate System Reports (PY 2023 and PY 2024) against the expectations set for the Kentucky Monitor Advocate System.

For Comparable Access: The data generally shows that MSFWs receive comparable access to basic and individual career services. percentages for "Received Basic Career Services" and "Received Individual Career Services" are very close between Non-MSFW and MSFW participants.

Area of Improvement: An area for improvement is noted in "Individuals placed Long Term Non-Agricultural Jobs," as in PY2023, 67.5% of Non-MSFW were placed compared to MSFW, which had a

placement rate of 61.4%. This situation worsened in PY2024, when Non-MSFW had a 69.5% placement rate compared to MSFW, which had a 50.0% placement rate. This is an area that warrants improvement and is further discussed below.

Significant State Status: Kentucky is considered a key state for serving Migrant and Seasonal Farmworkers (MSFWs). As a result, it's expected to meet specific minimum goals in at least four out of seven key service areas. However, Kentucky's workforce isn't largely bilingual (less than 10%), as confirmed by LEARS data, and therefore, the state does not have significant offices for service.

Detailed Analysis of Key Performance Indicators (KPIs):

1. Employment Rate (Q2 Exit):

- PY 2023:
    - Non-MSFW: 55.4%
    - MSFW: 64.9%
- PY 2024:
    - Non-MSFW: 68.7%
    - MSFW: 64.0%

In PY 2023, the MSFW Employment Rate exceeded the non-MSFW rate. However, in PY2024, the MSFW Employment Rate decreased and was lower than the Non-MSFW. This highlights an area that requires further analysis to determine the best placement for MSFW workers.

2. Median Earnings (Q2 Exit):

- PY 2023:
    - Non-MSFW: \$8,125
    - MSFW: \$6,780
- PY 2024:
    - Non-MSFW: \$8,303
    - MSFW: \$6,879

In both years, the median earnings for MSFWs were significantly lower than for non-MSFWs. This is a key area of concern. It indicates that even when MSFWs are finding employment, their earnings are lagging behind those of their non-MSFW counterparts. This could be due to a variety of factors, including lower-paying jobs, fewer hours worked, or other employment barriers.

3. Employment Parity: (Overall, Considering Both Employment Rate and Median Earnings) While the Employment Rates are generally comparable, the significant difference in Median Earnings indicates that parity is not being achieved.

4. Kentucky Career Center Reviews: Kentucky Career Centers are monitored annually for performance, potential risks, and federal guidance. Ultimately, monitoring is viewed as a means to improve services continually.

5. Agricultural Recruitment System (ARS) Field Checks: Kentucky has not had 10 or more job orders placed; therefore, there is no data to indicate that ARS field checks have had to be completed.

6. Outreach Activities: To improve MSFW outreach, DWD is committed to annual staff training, has reviewed its complaint process, and is exploring a statewide outreach team. KCC staff already provide MSFW outreach with training on services and the complaint system. DWD partners with KDE's Migrant Education Program and utilizes the MSIX system to connect with more farmworkers and support the education of migrant children. KCC also offers direct employment services and online resources, with a minimum of 40 documented outreach contacts per week.

7. Complaint Resolution: 100% of formal complaints have been processed and resolved in a timely and effective manner.

8. Minimum Service Level Achievement: Kentucky is meeting a majority of its minimum service level indicators, including exceeding the standard for job placements for both MSFW and Non-MSFW participants in PY 2023 and 2024. While median earnings and long-term non-agricultural job placements present ongoing challenges, the program is focused on developing strategies to enhance outcomes in these areas.

Summary and Recommendations:

1. Address the Earnings Gap: A key priority should be investigating the factors contributing to the lower median earnings of MSFWs, and implementing strategies to address this disparity will involve:

- Targeting training and job placement efforts toward higher-paying industries or occupations.
- Providing support services to help MSFWs negotiate for better wages and benefits.

2. Focus on long-term placement: Another area of focus should be on the analysis of how to increase long-term placement in Non-Agricultural jobs. Review existing programs or create new ones to enhance success in this area.

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.

The Kentucky Department of Workforce Development (DWD) remains committed to advancing services for Migrant Seasonal Farm Workers (MSFW) and addressing identified gaps in our workforce programs. Since the previous Agricultural Outreach Plan (AOP), we have achieved notable milestones, including the implementation of annual training sessions for staff, conducted on October 18, 2024, and August 20, 2025. These trainings enhance outreach capabilities and workforce system knowledge, directly benefiting MSFW engagement.

We have also undertaken a thorough review and modernization of the complaint process, transitioning from a locally based, manual system to a streamlined, centralized online platform. This new system enhances efficiency, consistency, and accessibility, facilitating the timely and equitable resolution of complaints while reducing administrative burdens on local staff.

Our ongoing outreach efforts have been bolstered by partnerships with organizations such as MET and the Migrant Education Program, enabling us to reach the highly mobile MSFW population more effectively. Professional development for staff, facilitated through site visits, industry conferences, trade shows, and guidance from WorkforceGPS, has strengthened our capacity to serve farmworkers, particularly those who primarily speak Spanish.

Despite these successes, specific goals remain unmet. The transition to a centralized complaint system and statewide outreach staffing is still in progress, with ongoing adaptations based on staff responses and resource availability. Fluctuations in farmworker employment, driven by seasonal crop cycles, continue to challenge consistent engagement and service delivery. Additionally, staffing shortages and resource constraints have impacted the scale and scope of outreach initiatives.

Root Causes for Not Fully Meeting Goals

The primary reasons for these gaps include the transient nature of the MSFW population, which complicates outreach and service continuity, as well as the time required to develop and fully implement new technological systems. Furthermore, staffing limitations have delayed the expansion of statewide outreach teams and the integration of comprehensive training activities.

Future Plans to Remedy Gaps

Looking ahead, DWD plans to:

- Complete the deployment and statewide operationalization of the centralized online complaint system, ensuring all stakeholders are trained for practical use.
- Expand staffing by leveraging statewide resources, including partnerships with KDE and other agencies, to increase outreach capacity.
- Enhance professional development offerings through targeted training, mentorship, and participation in industry events, ensuring staff remain knowledgeable and responsive.
- Strengthen collaboration with migrant and educational programs to improve identification and engagement of MSFWs, especially during peak farm seasons.

• Utilize real-time data from the new complaint system for continuous improvement, trend analysis, and systemic issue resolution.

• Maintain a focus on multilingual services, including partnerships with Interpretalk, to meet the linguistic needs of the MSFW community.

In summary, while significant strides have been made in improving MSFW outreach and complaint management, ongoing efforts are necessary to realize our program goals fully. We are dedicated to continuous improvement and will utilize these strategies to bridge existing gaps in the coming year

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, and has reviewed and approved 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	Yes

The State Plan must include	Include
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.	
5. The SWA has established and maintains a self-appraisal system for ES operations to determine success in reaching goals and to correct deficiencies in performance (20 CFR 658.601).	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 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	63.0%		65.0%	
Employment (Fourth Quarter After Exit)	60.0%		62.0%	
Median Earnings (Second Quarter After Exit)	6,100.0		6,300.0	

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
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 [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

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 Adult Education (KYAE) is governed by Title II, Workforce Innovation and Opportunity Act (WIOA) and the Kentucky Adult Education Act (Senate Bill 1, 2000 KRS 151B.055). KYAE recognizes the critical need for aligning adult education curricula to meet the higher demands of College and Career Ready Standards (CCRS), a subset of state standards recognized by the Office of Career, Technical, and Adult Education (OCTAE). Kentucky is setting the conditions to address the education and training needs of adult learners across the 120 counties in the Commonwealth which includes but not limited to marginalized and compromised populations such as inmates or those recovering from addiction, veterans, transitioning service members and their family members to provide the opportunity for transformational change across the Commonwealth. The intent is to meet adult learners where they are utilizing both the in-person and online/virtual modalities as well as a hybrid modality when and where applicable as it relates to the needs of the student. Kentucky has adopted the Common Core State Standards developed by the National Governor's Association (NGA), Council of Chief State School at all educational levels (P-12), postsecondary and adult education.

The 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.

KYAE's standards-based instruction and integration of digital literacy align with the content and format of the fifth edition of the GED® test used to award Kentucky's High School Equivalency (HSE) Diploma. Together, these provide KYAE's students the same opportunities for college and career readiness as graduating high school seniors.

Consequently, KYAE is part of an effort to create a seamless system for students to move from adult education to earning their 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. KYAE has adopted the Putting Kentuckians First (PKF) program to further ensure Kentuckians transitioning back to their communities have access and opportunities for employment through college and career focused education and training.

To ensure successful instructional effectiveness, KYAE 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, Ready for Industry, NorthStar Digital Literacy, etc.), effective instructional strategies, and instructional leadership. KYAE PL offerings are available via face- to-face, online, and blended formats.

KYAE has established Blackboard (Bb) as the Learning Management Software (LMS) to enhance instructor development through the Professional Learning Communities (PLC) process to improve overall adult learner/student outcomes across the 120 counties in Kentucky.

KYAE 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, Mathematics, and English Language Acquisition (ELA). The National Center for Families Learning (NCFL) is also a partner that currently provides professional learning communities targeting innovative practices.

KYAE continues to develop standard-based tools to assist instructors with aligning academic and workforce preparation instruction based on best practices and extant research. Instructional Framework content and associated pedagogical assets have been expanded and implemented 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], English Language Proficiency Standards [EPLS], student assessment criteria, and program performance metrics), along with the expertise of the MSU Adult Education Academy staff, were embedded into this process. Building upon local providers' input, there have been resources created to help support curricular needs and innovation in the classroom in Reading and Language Arts, Mathematics, and

English Language Acquisition. The Frameworks have been linked directly to both the CCRS and ELPS, they are available to all KYAE statewide staff in our Blackboard portal.

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

The English Language Proficiency (ELP) Instructional Framework is used 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 are organized in two ways. First, each ELP Standard is listed with level descriptors, aligned competencies, and resources. Second, resources are listed by proficiency level. The ELPS Framework is based on the five proficiency levels identified in the LINCS ELPS for Adult Education. As with the previous frameworks, the ELPS Framework is 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 across the local provider network.

KYAE plans to continue to align professional learning, tools, and resources to the LINCS repository resources. Additionally, KYAE has adopted a continuous improvement model as it relates to performance and providing adult education services. KYAE is committed to adopting more and various instructional technologies to accommodate the needs of students through and beyond the pandemic. KYAE is in the process of engaging all partners and stakeholders across the Commonwealth as well as on the national level to examine the use of current instructional technology, determining the best courses of action, and analyzing gaps in instructor competencies. KYAE is embedded within the Kentucky Workforce Innovation Board (KWIB) process to further align content standards through access to digital tools by leveraging emerging technologies such as AI.

Competitive process Section III(b)5.B.(i)]: KYAE released the Request for Applications (RFA) for AEFLA and Title II, WIOA funding for grant years 2026-2028 in January 2025. A competitive process was conducted to determine the eligible providers that were awarded funds starting July 1, 2025. The review of proposals included rating responses addressing the 13 considerations in Title II of WIOA and State-Specific requirements that indicate the applicants' ability to produce measurable skill gains and other defined metrics based on State goals for enrollment and secondary diploma/equivalent attainment. Through this process, KYAE awarded multi-year grants to 25 eligible providers throughout the State. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals and all 265 awardees demonstrated effectiveness across the requirements associated with WIOA, 2014, Section 231. 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). The 25 eligible providers represent the categories annotated in WIOA, Section 203 (5). Funding is currently being distributed based on population needs and performance for Fiscal Year 2026. Direct and equitable access Section III(b)5.B.(ii)]: All KYAE RFAs for grant/contract awards were 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, Title II, WIOA prescribed to the competitive process outlined above. Applications will were evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement and application and application review processes was in effect and applicable for all applicants; all applicants were treated in the same manner. The application process was designed so that direct application to the State eligible agency was clearly evident, customary, and non-negotiable. Grants were 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 underscored 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:

- 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:

- 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:

KYAE will continue to require standards-based academic instruction to be contextualized, at a minimum, by using its Employability Standards. 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 (IET) and Workplace Literacy (WPL) models and/or provide adult education support within more expansive career pathways programs. The state team continues to explore opportunities to partner with the local leaders to prioritize IET/WPL models aligned with Kentucky's recently updated five high demand employment sectors.

Integrated Education and Training (IET):

IETs are occupational specific programs working with a local training provider or post-secondary institution to co-teach toward an industry recognized certification or post-secondary transcript credit in the associated career pathway or industry-related program. The student outcome goal remains the same; earn a GED®/HSE diploma if not yet completed, and at a minimum, one industry-recognized credential in support of gaining employment and educational opportunities through the lifelong learning process.

KYAE has established a robust Integrated Education and Training (IET)/Workplace Literacy Program (WPL) process that supports the development of the co-teaching curriculum, along with the training or employer partner needs, to prepare students for the next step in their career. The Office of Adult Education established an IET/WPL Review Team led by the PAPC Branch. The IET/WPL Team developed an IET/WPL Planning Tool and curricular approval process to provide necessary guidance and assistance to local providers in the development, implementation, and evaluation of IET/WPL programs and processes. The IET/WPL Team is not only tasked with approving, but also monitoring status, completion and return-on-investment at regular intervals for all the IET/WPL program offerings across each grant cycle. The Team ensures compliance and adherence to a single set of learning objectives (SSLOs) or employer identified milestones to meet the minimum rigor requirements for both academic and training aspects. At current state, beginning Fiscal Year 26, there are over 60 approved, active IET and WPL programs being executed across the state.

KYAE encourages workforce partners to consider committing funding toward required occupational training service cost requirements as well as tuition. KYAE continues to leverage the Free GED Initiative in Kentucky in which the first-time test-takers can test for all four components of the GED test is at no cost. In addition, Kentucky adult learners/ testers can use the Free GED promo for up to two retests pending the availability of funds. These measures will assist in removing barriers to enable students to remain co-enrolled and accelerate earning an HSE/GED® diploma and occupational credential.

Additionally, the KYAE Outreach and Strategic Partnership Branch will enhance existing partnerships 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. In cohesion with that plan, KYAE will continue to expand on the current IET/WPL process to grow program offerings 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 pathways students can accelerate their educational and career accomplishments.

B. LOCAL ACTIVITIES

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, 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.

KYAE released the Request for Applications (RFA) for AEFLA and Title II, WIOA funding for grant years 2026-2028 in January 2025. A competitive process was conducted to determine the eligible providers that were awarded funds starting July 1, 2025. The review of proposals included rating responses addressing the 13 considerations in Title II of WIOA and State-Specific requirements that

indicate the applicants' ability to produce measurable skill gains and other defined metrics based on State goals for enrollment and secondary diploma/equivalent attainment. Through this process, KYAE awarded multi-year grants to 25 eligible providers throughout the State. An eligible provider is an organization that has demonstrated effectiveness in providing adult education activities to eligible individuals and all 265 awardees demonstrated effectiveness across the requirements associated with WIOA, 2014, Section 231. 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). The 25 eligible providers represent the categories annotated in WIOA, Section 203 (5). Funding is currently being distributed based on population needs and performance for Fiscal Year 2026.

Direct and equitable access Section III(b)5.B.(ii)]: All KYAE RFAs for grant/contract awards were 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, Title II, WIOA prescribed to the competitive process outlined above. Applications will were evaluated by review teams using the same rubric and scoring criteria. The grant or contract announcement and application and application review processes was in effect and applicable for all applicants; all applicants were treated in the same manner. The application process was designed so that direct application to the State eligible agency was clearly evident, customary, and non-negotiable. Grants were 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 underscored 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:

- 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:

- 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:

KYAE will continue to require standards-based, academic instruction to be contextualized, at a minimum, by using its Employability Standards. 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 (IET) and Workplace Literacy (WPL) models and/or provide adult education support within more expansive career pathways programs. The state team continues to explore opportunities to partner with the local leaders to prioritize IET/WPL models aligned with Kentucky's recently updated five high demand employment sectors.

Integrated Education and Training (IET):

IETs are occupational specific programs working with a local training provider or post-secondary institution to co-teach toward an industry recognized certification or post-secondary transcript credit in the associated career pathway or industry-related program. The student outcome goal remains the same; earn a GED®/HSE diploma if not yet completed, and at a minimum, one industry-recognized credential in support of gaining employment and educational opportunities through the lifelong learning process.

KYAE has established a robust Integrated Education and Training (IET)/Workplace Literacy Program (WPL) process that supports the development of the co-teaching curriculum, along with the training or employer partner needs, to prepare students for the next step in their career. The Office of Adult Education established an IET/WPL Review Team led by the PAPC Branch. The IET/WPL Team developed an IET/WPL Planning Tool and curricular approval process to provide necessary guidance and assistance to local providers in the development, implementation, and evaluation of IET/WPL programs and processes. The IET/WPL Team is not only tasked with approving, but also monitoring status, completion and return-on-investment at regular intervals for all the IET/WPL program offerings across each grant cycle. The Team ensures compliance and adherence to a single set of learning objectives (SSLOs) or employer identified milestones to meet the minimum rigor requirements for both academic and training aspects. At current state, beginning Fiscal Year 26, there are over 60 approved, active IET and WPL programs being executed across the state.

KYAE encourages workforce partners to consider committing funding toward required occupational training service cost requirements as well as tuition. KYAE continues to leverage the Free GED Initiative in Kentucky in which the first-time test-takers can test for all four components of the GED test is at no cost. In addition, Kentucky adult learners/ testers can use the Free GED promo for up to two retests pending the availability of funds. These measures will assist in removing barriers to enable

students to remain co-enrolled and accelerate earning an HSE/GED® diploma and occupational credential.

Additionally, the KYAE Outreach and Strategic Partnership Branch will enhance existing partnerships 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. In cohesion with that plan, KYAE will continue to expand on the current IET/WPL process to grow program offerings 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 pathways students can accelerate their educational and career accomplishments.

KYAE will expand on the current IET/WPL process to grow and expand the concept of IET in Kentucky beyond the existing programs 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.

KYAE will incorporate all the aforementioned statutory requirements and internal processes and protocols to ensure that all current and any future eligible providers operate adult education and literacy programs in accordance with the full spectrum of activities stipulated in section 203 of WIOA. All 25 current providers and any future providers will be required to support the 13 considerations per section 231 with an emphasis on Consideration #1 in support of the needs of WIOA participants as identified in the local plan developed by the Local Workforce Area (LWA).

KYAE will support the local providers via technical assistance support and monitoring to ensure the providers execute activities that address the needs of the adult learners within their service area as well as collaborate with other WIOA partners to set the conditions for adult learners to complete the secondary education process if applicable, transition to postsecondary education and training, acquire workforce recognized and relevant skills or certifications that lead to employment, and English language acquisition skills if necessary.

KYAE will ensure that allocated federal and state match funds are executed in accordance with 34 CFR section 463 subpart C. Allocation of funds are currently distributed across the 25 local providers based on the American Community Survey (data) for the counties within their service area. Monitoring and technical assistance will be led by the Program Administration, Performance, and Compliance (PAPC) Branch supplemented by the Mobile Response Team (MRT) to ensure adherence to the 13 Considerations and that funds are used for approved activities and services. The Fiscal Management and Contracts (FMC) Branch within KYAE will also review and scrutinize monthly invoices and other resource documents to ensure compliance with all applicable CFRs.

KYAE, using the consideration specified in section 231(e) of WIOA, will ensure compliance with all applicable CFRs associated with the execution of adult education and family literacy activities and

programs identified in section 203 by the implementation, execution, and monitoring a process to that includes but not limited to the following:

- Direct and equitable access: KYAE will ensure that all local providers maintain a service and instructional environment and culture that provides direct and equitable access to all eligible participants. This will be monitored and evaluated via site visits, virtual and in-person desk audits, periodic meetings, as well as training and professional development to address any gaps in support of the continuous improvement model.

- Same grant/contract announcement and application process: All announcements and associated documents and materials will be uniform across the state for all applicants. All applicants will receive the same information via the Bidders Conference process and the specific guidelines will be addressed in one Request for Proposal/Applications (RFP/RFA) that will be available to all applicants at one specified online location.

- Past effectiveness: Past effectiveness as a component of the demonstrated effectiveness will be required and implemented in a uniform manner with the same state-level thresholds established for all applicants. Consideration #3, past effectiveness will be a component of the review and scoring rubric process and all applications will be reviewed and scored using the same evaluation criteria.

- Local Board review process: The 10 Local Workforce Boards in Kentucky will be provided access to all application to review the applications in accordance with the 13 considerations with particular focus on Consideration #1. KYAE will coordinate with the Kentucky Workforce Innovation Board (KWIB) as well as the Education and Labor Cabinet to facilitate this process.

- Parts of the application: All components of the application will be reviewed and evaluated based on a uniform process applicable to all applicants. All information pertinent to the process as well as the expectation of compliance and performance will be communicated throughout the process with an emphasis on redundancy to ensure the dissemination process is thorough.

- Demonstrated effectiveness: All applicants will be advised of the demonstrated effectiveness requirement. Access to all data will be universally provided to all applicants via coordination with the Kentucky Center for Statistics (KY STATS) and access to the Kentucky Adult Education Reporting System (KAERS) data.

- Administrative costs: Administrative costs and the associated limits and requirements per section 233 of WIOA will be addressed and reiterated to all applicants and or eligible providers. All information will be available and accessible to all stakeholders engaged in the adult education and family literacy process.

KYAE is consistently planning and preparing to address current trends to support the future needs and desires of adult learners across the Commonwealth. The KYAE monitoring and technical assistance process will be utilized to identify the needs of adult learners to courses of action (COA) to mitigate

gaps in services and activities in support of the continuous improvement model for upcoming Performance Years (PYs). The Way Ahead for KYAE includes the enhancement of current and the development of partnerships to fulfill both the Title II WIOA requirements as well as maximize the co-enrollment across the other WIOA Titles in support of credential attainment and employment. These partnerships include but are not limited to: the Administrative Offices of the Court; Kentucky DOC; Kentucky Department of Veterans Affairs; and the Kentucky Department of Libraries and Archives. The planning process will determine the requirements that need to be addressed in future PYs.

Partnerships include collaboration with the National Center for Family Learning (NCFL) to maximize family literacy activities and services across the Commonwealth. KYAE will work to collaborate with other organizations which include but not limited to the Prichard Committee and the Goodwill Industries of Kentucky to leverage available expertise and resources as well as enhance opportunities to career pathways.

As a result of the planning and decision-making process, KYAE will continue to provide opportunities to connect local providers with local partners to enhance student access, support, and success. KYAE will leverage coordination and collaboration efforts within the ELC under the Department of Workforce Development (DWD) and nurtured partnerships with workforce partners which include but not limited to the following:

- Governor's Office of Early Childhood: KYAE continues to collaborate with the Early Childhood Office to develop more robust family engagement activities in support of parent and child time opportunities. The intent is for the local service provider staff to become aware of viable services available to their clients. KYAE will maximize the age-appropriate education under the family literacy definition in Section 203 of WIOA to best align Adult Education efforts with the services provided through the Early Childhood process.

Additionally, KYAE will share access to its Lesson Bank and Digital Skills curriculum with local Head Start educators.

Kentucky Department of Libraries and Archives (KDLA): KYAE has partnered with KDLA to maximize opportunities for learners to have access to structured family literacy related resources and tools. In addition, KDLA has administered programs and activities to enhance public libraries' capacity to offer High School Equivalency (HSE) testing and support services. Based on industry needs and the need to address services in many small, rural counties, the goal is to partner with community organizations to identify optimal courses of action to provide adult education services. Since libraries are often a prominent presence in most counties, they and other community organizations provide the opportunity for more effective and efficient use of resources.

C. CORRECTIONS EDUCATION AND OTHER EDUCATION OF INSTITUTIONALIZED INDIVIDUALS

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate programs that provide any of the following correctional educational programs identified in section 225 of WIOA:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;
- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

The 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 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. KYAE approaches corrections educational services based on the Jobs on Day One concept rooted in a collaborative process across government agencies, specifically the Kentucky Cabinet of Justice and Public Safety and the Governor's Office of Reentry Services. The intent is to increase the educational and vocational skill levels and equip inmates with skills to become self-sufficient to transition into career and educational opportunities as well as reduce the recidivism rate. Using a multi-pronged approach to corrections education, inmates are served both in adult state correctional and local correctional facilities such as independent jails.

- *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 in support of the IET process. Notwithstanding the totality of the factors that impact the educational and workforce environment across Kentucky, it is encouraged that jailers provide adequate space in a comfortable environment with student access to instructional materials to inspire additional study outside of the classroom setting. The Putting Kentuckians First (PKF) program administered by the Reentry and Employment Services (RES) Branch within the Office of Adult Education assists Kentuckians transitioning out of local jails and detention centers to obtain a secondary diploma, if necessary, receive career-related training, and secure employment. Kentucky statute KRS 533.270-290 established a Behavioral Health Conditional Dismissal Program which allows individuals with qualifying offenses to participate in this treatment and education/training program in lieu of incarceration. The RES Branch administers the education and training components of this statute under KRS 533.286.

- *State Correctional Institutions.* Currently, instructors are directly employed by the 14 institutions and primarily provide instruction during daytime hours. Counties within their respective regional service areas will serve inmates at state institutions based on the needs of the inmates/adult learners and or to supplement DOC employed instruction, which may include providing services primarily during evening hours. Correctional adult education students must meet the same eligibility criteria as any other adult student as described above. DOC is not funded with title II funds, however, the KYAE and DOC partnership enhances the delivery of adult education services to DOC residents and Kentuckians transitioning from a facility. KYAE understands the value of the full spectrum of adult education services, including integrated education and training, career pathways, concurrent enrollment, and peer tutoring and will conduct adult education and literacy activities, including preparation for earning a GED®/HSE diploma and preparation for incarcerated adults to transition with employability/essential skills while not excluding the aforementioned services. KYAE appreciates the benefits an accelerated co-enrollment program may have for inmates and seek opportunities to implement these programs. 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 reentry services for formerly incarcerated have become a statewide priority with the establishment of the Governor's Office of Reentry Services, KYAE as an office within the Education and Labor Cabinet is a component of the larger reentry system which includes the DOC, Justice and Public Safety Cabinet, the Cabinet for Health and Family Services, and the Personnel Cabinet. The KYAE goal in support of the overall statewide effort is to align the efforts of Local program directors and regional probation and parole officers to establish locally effective processes that are focused on outcomes that positively impact the formerly incarcerated/adult learner and workforce participation in the Commonwealth. This process has yielded partnership between jails/detention centers and employers as well industry specific training organizations that support the Jobs on Day One initiative.

- The provider is required by KYAE policies to attempt to contact the formerly incarcerated a minimum of three times within a 30-day period. The contact attempts must be documented and are subject to review during monitoring and performance assessments. 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, KYAE continues to work closely with DOC to modify and refine the referral process to ensure better outcomes. KYAE continues to seek opportunities to engage with recovery programs to provide adult education services to residents of these centers. 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 KYAE providers are leveraging virtual/digital capabilities and realizing efficiencies by serving cohorts of recovering clients on campus versus in-center instruction.

Not less than 82.5 % of grant funds are used to award grants under section 231. Of that amount, up to 20% may be used to support correctional education activities in section 225. The providers will coordinate with the Jailers within their service areas as well as with the appropriate DOC personnel within their region to provide the full spectrum of adult education and family literacy services allowable under 34 CFR 463 subpart C consistent with Section 225 requirements. KYAE will ensure through the monitoring and TA process established in the KYAE Program Manual address the adult education needs of the residents in the correctional institutions within their service areas and address the priorities of the state reentry office and the Justice and Public Safety Cabinet as it relates to reentry activities in support of addressing workforce participation requirements. The state of Kentucky has employed a robust effort to assist the reentry population with transitioning into postsecondary education, training, and employment. One of the KYAE signature reentry programs is the Putting Kentuckians First (PKF) program which facilitates the transition process for formerly

incarcerated Kentuckians as a component of the larger statewide reentry efforts.

- The Putting Kentuckians First (PKF) program administered by the RES Branch continues to be a significant component to the transition and pre-release training process in Kentucky. Through the PKF program, the RES staff has established partnerships with the Administrative Office of the Courts, DOC, the independent jails in multiple counties, and the courts across the Commonwealth to develop a pathway for education, training, and employment for Kentuckians transitioning out of jails/prisons through a robust pre-release program. This pre-release program is based on the Jobs on Day Once concept established by the Kentucky Justice and Public Safety Cabinet. The Education and Labor Cabinet has partnered with the Justice and Public Safety Cabinet to develop pathways and implement pre-release classes to ensure that when residents are released from Kentucky's jails and prisons, they have received the requisite education, training, and associated wrap-around services to gain employment on day one of their release from jail or prison. The RES Branch through the PKF program is spearheading this process for KYAE in support of the Education and Labor Cabinet's Jobs on Day One priority. Under the Jobs on Day One concept, family literacy is a necessity and a priority as many Kentuckians transitioning out of jails/prisons are parents and or fulfill a prominent role as a provider, mentor, etc. within a family structure. The PKF process through partnerships with other state offices and stakeholders across the Commonwealth will coordinate with adult education providers to ensure that services are provided to PKF participants. In the event that some PKF participants may fall outside of the eligibility criteria, the need to set the conditions for self-sufficiency; to gain digital literacy skills; and to develop both cognitive and social skills that may have eroded during the period of incarceration, KYAE views these individuals as candidates for services under the Special Rule in Section 231 of WIOA in support of the five pillars of the America's Talent Strategy: Building the Workforce for the Golden Age. Per Section 231, attempts will be made to partner with other state agencies and stakeholders to provide services for these individuals, but KYAE will be prepared to provided services if partnerships cannot be established. In addition, KYAE views veterans and transitioning service members and their family members as candidates for services under the Special Rule in Section 231 of WIOA.
- Consistent with the core services provided under section 231 of WIOA, all funds used to fulfill section 225 activities and services will be in accordance with 34 CFR section 463 subpart C. The monitoring and TA process will be utilized to identify the needs of adult learners involved in the corrections and institutionalized education process to develop COAs to mitigate gaps in services and activities in support of the continuous improvement model for upcoming PYs. A deliberate planning process will be executed to address emerging trends and needs within the correctional and institutionalized facilities across Kentucky. The COAs will be presented to the jailers and DOC personnel to ensure alignment with their facility requirements and needs prior to implementation.

D. INTEGRATED ENGLISH LITERACY AND CIVICS EDUCATION PROGRAM

Describe how the eligible agency will, using the considerations specified in section 231(e) of WIOA and in accordance with 34 CFR 463 subpart C, fund eligible providers to establish or operate Integrated English Literacy and Civics Education (IELCE) programs under section 243 of WIOA. Describe how adult English language learners, including professionals with degrees and credentials in their native countries, are served in IELCE programs.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be offered in combination with integrated education and training activities found in 34 CFR section 463.36.

Describe how the Integrated English Literacy and Civics Education program under section 243(a) of WIOA will include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation.

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.

Kentucky recently conducted a competitive Request for Applications in early 2025 for the 1 July 2025 – 30 June 2028 Grant Cycle. As a result of the competition, seven Adult Education eligible applicants were awarded IELCE funding under Section 243: Bluegrass Community and Technical College; Jefferson County Public Schools; Southcentral Kentucky Community and Technical College; Newport Independent Schools, Jefferson Community and Technical College, West Kentucky Community and Technical College, and Gateway Community and Technical College. These applicants cover the following high-volume ELL Kentuckians: Fayette, Jefferson, and Warren counties, Norther Kentucky/Greater Cincinnati counties, and Paducah/McCracken County in the far west of the state.

In PY24, IELCE programs served 2,607 English Learner Students (ELLs), attaining 1,287 measurable skill gains (MSGs). All IELCE programs have access to Integrated Education and Training (IET) opportunities through both state and program specific partnerships with providers across the Commonwealth. Intentional and intense IET-specific training and IELCE guidance has been conducted with IELCE program directors and will continue in the future. For IELCE applicants of the RFA, separate forms are required describing the program’s plan of service and indicate how resources would be allocated in the budget and budget narrative.

As a result of the monitoring process, KYAE will assess to ensure that all IELCE program components are fully integrated in those programs awarded IELCE funds as a result of the 2025 grant competition. KYAE will ensure that all IELCE award recipients adhere to the 13 Considerations via the monitoring and TA process which will include but not limited to periodic site visits as well as desktop assessments to determine execution of section 243 funds in accordance with 34 CFR 463 subpart C.

KYAE, using the consideration specified in section 231(e) of WIOA, will ensure compliance with all applicable CFRs associated with the execution of adult education and family literacy activities and programs identified in section 203 by the implementation, execution, and monitoring a process to that includes but not limited to the following:

- Direct and equitable access: KYAE will ensure that all local providers maintain a service and instructional environment and culture that provides direct and equitable access to all eligible participants. This will be monitored and evaluated via site visits, virtual and in-person desk audits, periodic meetings, as well as training and professional development to address any gaps in support of the continuous improvement model.

- Same grant/contract announcement and application process: All announcements and associated documents and materials will be uniform across the state for all applicants. All applicants will receive the same information via the Bidders Conference process and the specific guidelines will be addressed in one Request for Proposal/Applications (RFP/RFA) that will be available to all applicants at one specified online location.

- Past effectiveness: Past effectiveness as a component of the demonstrated effectiveness will be required and implemented in a uniform manner with the same state-level thresholds established for all applicants. Consideration #3, past effectiveness will be a component of the review and scoring rubric process and all applications will be reviewed and scored using the same evaluation criteria.

- Local Board review process: The 10 Local Workforce Boards in Kentucky will be provided access to all application to review the applications in accordance with the 13 considerations with particular focus on Consideration #1. KYAE will coordinate with the Kentucky Workforce Innovation Board (KWIB) as well as the Education and Labor Cabinet to facilitate this process.

- Parts of the application: All components of the application will be reviewed and evaluated based on a uniform process applicable to all applicants. All information pertinent to the process as well as the expectation of compliance and performance will be communicated throughout the process with an emphasis on redundancy to ensure the dissemination process is thorough.

- Demonstrated effectiveness: All applicants will be advised of the demonstrated effectiveness requirement. Access to all data will be universally provided to all applicants via coordination with the Kentucky Center for Statistics (KY STATS) and access to the Kentucky Adult Education Reporting System (KAERS) data.

- Administrative costs: Administrative costs and the associated limits and requirements per section 233 of WIOA will be addressed and reiterated to all applicants and or eligible providers. All information will be available and accessible to all stakeholders engaged in the adult education and family literacy process.

KYAE'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. The Revised English Language Proficiency Instructional Framework aligns with CASAS and CLAS-E more explicitly to the ELP Standards in a streamline and simplified format.

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)]: Consistent with the 2022 -2025 grant cycle, KYAE has developed a competitive application process for federal AEFLA funding to determine the eligible providers that were awarded funds starting July 1, 2022. The review of proposals included 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, KYAE will identify, assess, and award multi-year grants to eligible providers throughout the State. This process resulted in awards to three eligible applicants in Kentucky. 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.

Currently, PAPC, using Office of Career, Technical, and Adult Education (OCTAE) resources, is conducting technical assistance sessions specifically targeting IELCE programs and Integrated Education and Training (IET) models. New processes and protocols have been implemented to provide IET/WPL access for IELCE participants. One example is the addition of quarterly check-ins with all IELCE Directors and specialized support available upon request.

The PAPC Branch conducts periodic assessments to ensure strategies are being implemented and producing the desired outcomes. At the end of the fiscal year, each IELCE provider will be required to show evidence IELCE participant progress. This will serve as a monitoring tool for the PAPC Branch to

assess performance outcomes, ensure compliance, address barriers to implementation, provide technical assistance, and identify key strategies and best practices to support IELCE programming.

IELCE program students will have access to partnership programs. KYAE has significantly increased access to IET/WPL partnerships via the IET/WPL Review Team and Planning Tool process. Kentucky has adopted a statewide IET/WPL process that provides all eligible providers the opportunity to establish new IET/WPL programs and/or select from a menu of approved existing templates that can be shaped to the needs of their respective services areas.

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 Education and Labor (ELC) Cabinet s purview: Kentucky Department of Workforce Development (DWD), Workforce Innovation Board (KWIB), Department of Libraries and Archives (KDLA), Center for Statistics (KYSTATS), Department of Education , 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), Industry and Apprenticeship Services, and Kentucky Adult Education. KYAE 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), the Administrative Office of the Courts (AOC), the Kentucky Council on Postsecondary Education (CPE) and more.

KYAE has become fully indoctrinated into the ELC under the Department of Workforce Development (DWD) and nurtured partnerships with workforce partners which include but not limited to the following:

- Early Childhood: KYAE continues to enhance the partnership with the Kentucky Governor's Office of Early Childhood. KYAE continues to explore pathways to expand family engagement activities for Kentucky families to maximize the age-appropriate education component under the family literacy definition in Section 203 of WIOA to best support the efforts of the Governor's Office of Early Childhood.

- Kentucky Department of Libraries and Archives (KDLA): KYAE continues to partner with KDLA to better leverage the library system across the state. KDLA has also taken a more prominent role in bringing visibility to HSE/GED testing options via the local library system. 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. 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 effectiveness and modify for continued improvement of services. KYAE will monitor the strategy's successes and challenges in support of improved student outcomes.

- Perkins Leadership Grant Funds: KYAE was awarded leadership funds to reinforce its College and Career Navigator (CCN) support for FY 23, 24 and 25. Providers must employ at least one full-time CCN per KYAE Program Manual and add more CCN services (hires) as enrollment dictates. The scope of work for the Perkins Grant was modified to address the need for training in the areas of partnership development in support of enhancing the referral process and setting the conditions for success for the IET/WPL process.

The Perkins grant afforded KYAE the opportunity to plan statewide summits to provide professional development for all KYAE staff as well better align the efforts of all WIOA partners across the Education and Labor Cabinet and the Commonwealth. The CCN Coordinator is tasked with ensuring CCNs complete a Career Pathway Plan on everyone adult learner served across the local provider network to navigate adult learners towards their college and or career goals. The focus will go beyond contacting clients by facilitating the necessary services clients need to mitigate barriers to their education, training, and employment goals. The CCN Coordinator provides training sessions for local navigators in conjunction with the other branches in the Office of Adult Education. Additionally, activity logs are used 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 and employment 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. KYAE is analyzing the longitudinal data and leveraging the expertise of the Kentucky Center for Statistics (KY STATS) staff to determine the impact that the CCNs have on student outcomes.

- Kentucky Workforce Innovation Board (KWIB): KYAE is represented on the board and several KWIB committees. The KYAE Executive Director currently chairs the KWIB Workforce

Participation Committee. KYAE is an integral component of meeting the needs of employers and working-age Kentuckians by providing the requisite education and training to develop a highly skilled workforce across Kentucky's top five in-demand employment sectors: Healthcare; Manufacturing & Logistics; Construction; Education; and Professional, Scientific, & Technical Services. KYAE is also represented on the KWIB AI Workforce Readiness Taskforce in support of Pillar V of America's Talent Strategy: Building the Workforce for the Golden Age. 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. KYAE shares KAERS data with KYSTATS to keep the dashboard up-to-date. The Adult Education Feedback Report located on the KY STATS website provides visibility to stakeholders to include the Local Workforce Boards regarding the progress and performance of the adult Education provider within their service area in support of Consideration #1 under Section 231 of WIOA.

- Kentucky Council on Postsecondary Education (CPE): KYAE is a member of several CPE committees and working groups which include the Student Basic Needs Action Network under the Student Success Collaborative and the Commonwealth Education Continuum. KYAE works with CPE to further provide pathways and opportunities for Kentuckians to not only transition to postsecondary education and training but to complete the process whether by obtaining upskilling; certifications; and or a degree. KYAE has engaged in a new Memorandum of Agreement with CPE for FY26 to support CCN and staff training. The sessions support both state and local staff in efforts to better understand transitions to higher education and how adult education fits into the process. The two offerings are for "Higher Education 101" and "Coaching Fundamentals" both of which count for Professional Learning credit in FY26.

- Work Ready Kentucky Scholarship: The Commonwealth's WRKS is dedicated to funding tuition for up to 60 credit hours of occupational training. 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. While the WRKS also provides $400 per year for mandatory fees, students frequently find course-required book, supply, equipment, etc. costs prohibitive. Kentucky offers free GED testing for first time GED test takers. KYAE plans to continue to wave the GED test fee for qualifying students dependent upon Cabinet approval and the availability of funds. These measures will assist in removing barriers to students remaining co-enrolled and accelerate earning an HSE/GED diploma and occupational credential.

- Kentucky Cabinet for Health and Family Services (CHFS): The KYAE Executive Director will continue to coordinate with CHFS regarding providing access to adult learners for available barrier mitigation related services via the kynect platform for qualified individuals and families. In addition, KYAE under Kentucky Statute KRS 533.270-290 (Behavioral Health Conditional Dismissal Program) works closely with CHFS, specifically the Department for Behavioral Health, Developmental and Intellectual Disabilities (DBHDID) in support of the education and

training requirements for participants under KRS 533.286. The Reentry and Employment Services Branch has two coordinators on staff to not only support the learners coming from the partnership, but also to support the local instructors and staff across the state that work with these participants.

- Strategic Partnership Coordinators: Strategic Partnership Coordinators (SPCs) in the Outreach and Strategic Partnerships Branch facilitate partnerships between the local providers and employers and potential training partners in support of the IET/WPL process. The SPCs also coordinate with the ELC Workforce Talent Project Managers within the Office of Industry and Apprenticeship Services to identify opportunities for engagements with current employers as well as emerging industry partners in the Commonwealth.

Other partnerships include collaboration with the National Center for Family Learning (NCFL). KYAE and NCFL partner to provide professional learning opportunities for adult education instructors and staff to support family literacy and other adult education core requirements based on emerging priorities and adult learner needs. KYAE will work to collaborate with other organizations which include but not limited to the Prichard Committee and the Goodwill Industries of Kentucky to offer GED test preparation in conjunction with entry- level employment opportunities.

High quality professional development: In FY 26 and for the Way Ahead pending alignment with Education and Labor Cabinet priorities, KYAE set the following goals: (1) Improve staff digital literacy and edtech proficiency of students and provider network via Professional Learning (PL) and promotion of digital growth mindset to include AI awareness and application within ELC guidance, (2) Support successful implementation of IET/WPL programs , (3) Offer every student a blended learning experience, and (4) Improve overall staff professional development in support of transitioning adult learners to postsecondary education/training and employment.

Professional Learning Communities (PLCs) continue to be the centerpiece of the KYAE PL Model. PLCs emphasize student focus, provider voice, employer engagement, and local innovation. The goal is that PLCs will have long-term impact on cooperative problem-solving affecting local program performance.

These resources to support performance outcomes via PL include an Instructional Framework Series designed to improve the quality and efficiency of Mathematics and Reasoning through Language Arts instruction; a Student Persistence/Retention Framework containing strategies targeted to adult learners; many self-paced courses for staff to engage on their own schedules, and a full year of Lunch and Learn calendars, regularly on Monday and Wednesday lunch hours, supporting a myriad of instruction-based topics.

KYAE 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. KYAE has/will analyze qualitative and quantitative

data to determine supportive themes for future PLC work. Themes will target elements that improve student outcomes in support of MSG goals and State-Specific Requirements and further KYAE's strategic goals of the development of partnerships, recruiting, retaining, results, and referrals to support quality services and successes for students.

PL plans: Professional Learning Communities (PLCs) and all professional learning opportunities have been reorganized to better meet the needs of the instructional staff and be more aligned with Kentucky Department of Education standards and best practices across the adult education community in the United States.

The KYAE Professional Learning Model will be further modified to address emerging statewide trends, such as the prioritization of industry needs, scaling pre-apprenticeship opportunities, AI literacy and skill development, and differentiated instruction that focuses on the development of skills for Kentucky's top five in-demand sectors. This modification has included a multi-pronged approach over the last few fiscal years.

KYAE utilizes Blackboard (Bb) as the Learning Management System (LMS) in for all PL offerings now. All course shells and all course content are developed in Bb. In addition, the KYAE Staff Development Training modules, several different Resource Hubs, and recordings of previous trainings are also located on Bb.

Successful, researched-based 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. New digital literacy/distance learning initiatives have focused on harnessing instructional technology for differentiated instruction and cohort development rooted in work-based learning models that are aligned with education and training programs to career pathways. Kentucky will continue to leverage lessons learned from participation in the Teaching the Skills that Matter and Digital Resilience in the Workplace (DRAW) processes to support industry-driven strategies and employer needs.

The KYAE Professional Learning Model utilizes 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.

- *Technical assistance:* KYAE has a Program Administration, Performance, and Compliance (PAPC) Branch which consists of three state-level employees, who provide technical assistance to KYAE-funded adult education providers in Kentucky. KYAE has transitioned from a regional model to Mobile Response Team (MRT) Model which will consists of subject matter expert (SME) representatives from each of the six Branches and the Morehead State University Adult Education Academy. The PAPC Branch coordinates with the Commonwealth Office of

Technology (COT) through the Office of Technology Services to provide technical assistance related to the Adult Education student information system called the Kentucky Adult Education Reporting System KAERS.

- The use of KAERS data and reporting features are used to provide State staff and local providers with visibility of student assessment data and accountability measures using data analytics. KYAE also coordinates with the Kentucky Center for Statistics (KYSTATS) to migrate KAERS data into the KYSTATS Adult Education Feedback Report.
- PAPC as well as other OAE staff members also conduct periodic engagements with all local program directors to review performance data and strategies for improving outcomes. Directors are asked to rate strategies for effectiveness. These engagements afford the directors the opportunity to address successes and challenges concerning their innovation, PLC plans and targets.
- Throughout the year, new information relative to performance, WIOA, etc., is disseminated through training sessions, quarterly updates, mass e-mails, Blackboard announcements, and other forms of online communication. KYAE State staff address local provider inquiries via telephone and e-mail correspondence and conduct site visits as requested as well as scheduled site visits via the MRT Model. The Executive Director conducts state circulation visits to meet adult learners and to observe local provider operations and to ensure compliance with Sections 201-243 of WIOA and adherence to contract requirements.

Monitoring and Evaluation: KYAE is strongly committed to ongoing data analytics supporting local program success in producing quality student outcomes based on core indicators of performance. KYAE staff monitor, evaluate, share resources, and provide TA in a myriad of ways, both directly and indirectly. KYAE will coordinate with the Kentucky Center for Statistics (KYSTATS) to enhance the Adult Education Feedback Report to provide all stakeholders, specifically fiscal agents and local providers visibility of their progress as well as areas for improvement as it relates to performance. Presented below are some of KYAE's major monitoring, evaluation, and program support components.

- KYAE's Program Administration, Performance, and Compliance (PAPC) Branch serves as the primary point of contact for local programs regarding performance and compliance with adult education requirements. KYAE 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. In accordance with monitoring requirements and based on progress towards MSG and State-Specific Requirements goals, PAPC Branch members as part of a Mobile Response Team will conduct on-site compliance visits, gathering information to ensure local provider compliance with all applicable laws, regulations and policies and in support of achieving performance goals. Programs will be

held to the published Continuous Improvement checkpoints each year, which can dictate if any low performing program needs technical assistance in a more targeted way. Monthly and quarterly checks for performance compliance can result in a Performance Improvement Plan (PIP – first level), Technical Assistance Plan (TAP – second level), or Corrective Action Plan (CAP – final level) to hold the local area accountable. Those plans are supportive and not punitive in nature, helping the local areas develop their own plans for how to address their deficiencies, whether performance outcome or other concern related. PAPC provides these checkpoints and takes the lead in any Continuous Improvement Plans required, looping in other teams as they are needed to provide the necessary support.

- Monitoring activities are conducted throughout the program year. Desktop compliance checks are performed for around 8-10 counties each quarter, surveying about ¼ of our state each year. Following a comprehensive review of KYAE's Kentucky Adult Education Reporting System, desk reviews are based on requirements of the enrollment paperwork and best practices in record keeping, and are aligned with established goals, and obtainable through KAERS. Additionally, a secondary data analysis further examines characteristics of performance. This action ensures that both KYAE and the local program directors are aware of and effectively use data to monitor program performance and accountability, and to show proof of good record keeping stewardship across the provider network

Each year approximately 30 of the 120 counties served by KYAE are randomly selected for annual audits conducted by the Kentucky Auditor of Public Accounts. The audits consist of both record and financial reviews and include a review of programs' compliance with KYAE policy. KYAE 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: KYAE has transitioned to having the full capability to provide all services with the full integration of technology in the classroom to maximize all resources and assets to improve student outcomes – use of technology in the classroom and remotely. KYAE is actively working with the Education and Labor Cabinet to ensure access and availability of technology across all 120 counties in Kentucky regarding adult education services.

The Instructor Development and Student Outcomes (IDSO) Branch in conjunction with the Morehead State University Adult Education Academy will continue to concentrate on instructional technology support for both state and local initiatives. Many innovation projects involved technology, online courseware is used by providers (including Kentucky Educational Television's [KET], Fast Forward, Burlington English, Aztec, EdReady, and others) and distance learning discussions. The intent is to emphasize reaching more students, new and innovative delivery mechanisms are necessary.

Google Classroom and Microsoft Teams/Zoom Videoconferencing have been adopted as essential instructional tools in the KYAE 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 maximize the use of technology to improve student outcomes.

Moving forward all available Instructional Technology applications and frameworks will be utilized to provide and enhance all instructional services provided to students in all 120 counties across the state. The intent is to supplement, not supplant quality in-person and synchronous instruction. This supports the KYAE philosophy that sound instruction is designed around clear learning objectives. Integration of the technology tools will allow for greater contextualization and digital literacy needed for college and career success.

Professional learning will be 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).

The intent of the data-driven PL Model is to improve performance across the local provider network by enhancing the digital competence and instructional acumen of both the State and local provider network staffs.

The PL Goals for FY 26 include classroom observations to identify challenges and implement research based best practices to improve student outcomes. Blackboard will be used as the KYAE LMS in support of PL pathways. These pathways will provide Math, RLA/Sci/SS. ESL, and Edtech PL tracks designed to incrementally improve instructional expertise and student outcomes. Observation data, feedback, and level setting training will be used in conjunction with performance data to re-align PL electives and PLC foci in support of improving student outcomes.

F. ASSESSING QUALITY

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II. Describe how the eligible agency will take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA. Describe how the eligible agency will use evaluations, data analysis, program monitoring, or other methods to improve the quality of adult education activities in the State.

Professional Development

Pursuant to the local provider's contract with KYAE, the local provider is responsible for operating the program in compliance with the fiscal year's Kentucky Office of Adult Education Learning Plan. As the instructional leader of the program, the program director ensures all staff understand and fulfill the professional learning requirements included in KYAE's Professional Learning Handbook. IDSO staff and the Morehead State University Adult Education Academy track compliance throughout the year and non-compliance is noted in the provider's file for reference during periodic monitoring sessions, quarterly director update meetings, end of year performance reviews, and grant competitions review.

KYAE utilizes PLCs for all experienced instructors, CCNs, assistant directors, and program directors working 500+ hours per year. These provider-based PLCs are designed to provide access to data-driven best practices centered on instructional content and statewide trends. The intent is to continue to provide local providers with the tools to better instruct and serve adult learners.

Program Administration, Performance and Compliance

KYAE is continuously seeking new ways to analyze and draw conclusions from the data. KYAE uses KAERS, however, the Kentucky Center for Statistics (KYSTATS) provides the Adult Education Feedback Report to assist with the analysis of performance data across the local provider network and the 120 counties. Although local providers have been trained on the use of KAERS and reports that provide data by county, KYAE will enhance the partnership with KYSTATS to make the Adult Education Feedback Report more relevant to current operations and the Way Ahead to include aggregating performance data by local provider. The intent for FY 26 and in the coming years per this State Plan is to maximize the use of the Feedback Report on the KYSTATS website to monitor and evaluate program services, performance, student outcomes, state-specific requirements, etc. KYAE uses a data quality checklist and has provided guidance to providers on maximizing data quality.

KYAE annually publishes a *Program Manual* in which performance expectations are addressed among other KYAE requirements. These include but are not limited to, WIOA's common performance measures and goals emphasizing HSE attainment, measurable skill gains, and targeted enrollment. KYAE Guidelines are consistently reviewed and re-written to better address the needs of adult learners in Kentucky and to ensure local providers are achieving State-Specific Requirements and Goals, in compliance with OCTAE requirements, and administering adult education services consistent with the RFA 2026-2028. The KYAE Program Manual outlines the process regarding technical assistance and monitoring for performance which includes development of a Performance Improvement Plan (PIP) that will address performance benchmarks, improvements, monitoring dates/times, and next steps based on documented progress or the failure to demonstrate continuous improvement.

The KYAE Assessment process is a comprehensive systematic approach that includes a collection of state, cabinet, public, non-profit and private partners that feed the evaluation and assessment of providers. Components of the assessing quality mechanism are annotated below:

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, 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 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)

APPLICANT'S ORGANIZATION	**Enter information in this column**
Applicant's Organization	Office of Adult Education (OAE)Kentucky Adult Education (KYAE), Education & Labor Cabinet
PRINTED NAME AND TITLE OF AUTHORIZED REPRESENTATIVE	**Enter information in this column**
First Name	John
Last Name	Gregory
Title	Executive Director
Email	john.gregory@ky.gov

SECTION 427 OF THE GENERAL EDUCATION PROVISIONS ACT (GEPA)

STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

• Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.

• Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.

• Applicants are not required to have mission statements or policies that align.

• Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.

• Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

GEPA Section 427 Instructions to State Applicants for their Subrecipient Applicants

The State grantee provides a subrecipient applicant seeking Federal assistance instructions and guidance for how it must comply with the GEPA Section 427 requirement. The State grantee determines the form and content of the information a subrecipient applicant must include in its application regarding the steps it proposes to take to ensure equitable access to, and equitable participation in, its local-level project or activity. For example:

• The State grantee may require its subrecipient applicant to use and submit the GEPA Section 427 form that it is required to submit to the Department; or

• The State grantee may use a State-developed form that is sufficient to meet the GEPA Section 427 requirement.

• The State grantee maintains the subrecipient applicants' responses in the State office.

Please refer to GEPA 427 - Form Instructions for AEFLA Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.*

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

KYAE will take any and all necessary steps to ensure equitable access to, and participation in this Federally-assisted program for all populations across the Commonwealth of Kentucky. All adult literacy programs and services and associated functions executed in Kentucky will consider and address at a minimum the six types of barriers highlighted in the statute. The steps to mitigate challenges associated with barriers will include but not limited to the following: (1) Distributing brochures and other associated content about proposed programs and services to potential participants in their native language; (2) Making materials available on audio tape or in braille to accommodate specific student needs; and (3) Conducting outreach efforts to reach across all genders and identities.

The State engages in an active process to identify accommodations and services related to potential obstacles for individuals with disabilities and or members of marginalized populations across the six types of barriers. The State's efforts include but not limited to: (1) making facilities accessible to all individuals to include persons with disabilities; (2) modifying work schedules and training sessions to accommodate all citizens regardless of demographics or disability status; and (3) provisions for readers and interpreters.

The State will continue to review all services, programs and processes on a periodic basis to identify barriers that may impede access and to develop courses of action to address any gaps in equitable access across the adult education spectrum.

The State provides equitable access to all staff projects, training events, and associated professional development activities for all citizens with consideration for the six types of barriers highlighted in the statute.

Direct and equitable access Section III(b)5.B.(ii)]: All KYAE 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.]

KYAE, an office of Education and Labor Cabinet (ELC), 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. KYAE 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. KYAE 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 PAPC Branch 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 ELC. 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.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the*

steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

The goal is to create an adult education and family literacy culture and environment that is free of barriers that impede equitable access and participation; however, the planning and decision-making process has revealed the potential for barriers. Access barriers such as the lack of or inadequate entrance/exit points and passageways for individuals with mobility challenges has been identified as a barrier. In addition, hearing and visually impaired materials and resources or the lack thereof has been identified as another potential barrier. KYAE has also considered potential barriers regarding academic accommodations for adult learners, educators, and or partners to include addressing the needs of individuals within the neurodiverse community.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.*

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

KYAE will take the necessary steps to address the identified potential barriers by leveraging existing and emerging partnerships within the Education and Labor Cabinet and across the Commonwealth. Each barrier will be thoroughly evaluated to develop the most efficient and effective as well as timely process to mitigate the barrier and provide equitable access and participation opportunities for all eligible Kentuckians.

These steps will include but not limited to coordination with ELC Departments and Offices such as the Office of Vocational Rehabilitation, the Kentucky Commission on the Deaf and Hard of Hearing, and the Kentucky Department of libraries and Archives as well as Kentucky Educational Television. The intent is to create an environment and climate that is a safe space for all eligible Kentuckians.

This process will involve working with leaseholders and building owners to make the necessary modifications and improvements to accommodate all Kentuckians. Relocation will also be considered if an existing structure cannot be made accessible in a timely manner pending Education and Labor Cabinet approval. Continuous reviews of accessibility requirements will be conducted to ensure compliance with American Disabilities Act and other inclusive state and federal requirements.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity. The State applicant is also responsible for ensuring that its subrecipient applicants complete the GEPA Section 427 form or a State developed form that sufficiently meets the GEPA Section 427 requirement for any local-level-project and activity and maintains the subrecipients' responses in the State office.*

GEPA 427 - Form Instructions for AEFLA Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

The timeline is As Soon As Possible (ASAP) based on available funding, materials, and equipment if applicable; coordination efforts; and Education and Labor Cabinet approval. The intent is to resolve all identified barriers within the shortest time duration possible with a focus on comprehensive access and barrier mitigation. Each situation may be different and thus the timeline may be impacted by the totality of the circumstances.

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 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	43.50%		44.00%	

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Fourth Quarter After Exit)	47.00%		47.50%	
Median Earnings (Second Quarter After Exit)	$4,650.00		$4,700.00	
Credential Attainment Rate	41.60%		42.60%	
Measurable Skill Gains	52.50%		53.00%	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADULT EDUCATION AND LITERACY PROGRAM PERFORMANCE INDICATORS

Performance Negotiations Table:

PERFORMANCE INDICATORS	**PY 2026 (FY 2027) Negotiated Level**	**PY 2027 (FY 2028) Negotiated Level**
Employment (2nd QTR After Exit)	43.50%	44.00%
Employment (4th QTR After Exit)	47.00%	47.50%
Median Earnings (2nd QTR After Exit)	$4,650.00	$4,700.00
Credential Attainment Rate	41.60%	42.60%
Measurable Skill Gains (MSG)	52.50%	53.00%

PERFORMANCE INDICATORS	**PY 2026 (FY 2027) Negotiated Level**	**PY 2027 (FY 2028) Negotiated Level**
Employment (2nd QTR After Exit)	43.50%	44.00%

Employment (4th QTR After Exit)	47.00%	47.50%
Median Earnings (2nd QTR After Exit)	$4,650.00	$4,700.00
Credential Attainment Rate	41.60%	42.60%
Measurable Skill Gains (MSG)	52.50%	53.00%

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

The Vocational Rehabilitation (VR) Services Portion of the Unified or Combined State Plan must include the following descriptions and estimates, as required by sections 101(a) and 606 of the Rehabilitation Act of 1973, as amended by title IV of WIOA.

A. STATE REHABILITATION COUNCIL.

1. ALL VR AGENCIES, EXCEPT FOR THOSE THAT HAVE AN INDEPENDENT CONSUMER-CONTROLLED COMMISSION, MUST HAVE A STATE REHABILITATION COUNCIL (COUNCIL OR SRC) THAT MEETS THE CRITERIA IN SECTION 105 OF THE REHABILITATION ACT. THE DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPLICABLE, HAS:

Select A or B:

(A) is an independent State commission

(B) has established a State Rehabilitation Council

(B) has established a State Rehabilitation Council

2. IN ACCORDANCE WITH ASSURANCE (A)(1)(B), IF SELECTED, PLEASE PROVIDE INFORMATION ON THE CURRENT COMPOSITION OF THE COUNCIL BY REPRESENTATIVE TYPE, INCLUDING THE TERM NUMBER OF THE REPRESENTATIVE, AS APPLICABLE, AND ANY VACANCIES, AS WELL AS THE BEGINNING DATES OF EACH REPRESENTATIVE'S TERM.

Select 'Edit' to edit the narrative.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Statewide Independent Living Council (SILC)	1	04/25
Parent Training and Information Center	2	02/24
Client Assistance Program	1	04/25
Qualified Vocational Rehabilitation (VR) Counselor (Ex Officio if Employed by the VR Agency)	1	04/25
Community Rehabilitation Program Service Provider	2	10/25
Business, Industry, and Labor	2	10/25
Business, Industry, and Labor	Vacant	08/22
Business, Industry, and Labor	Vacant	08/22
Business, Industry, and Labor	1	02/23
National Federation for the Blind	2	08/25
Kentucky Council for the Blind	2	08/25
Bluegrass Council for the Blind	1	12/25
Committee of Blind Vendors	1	12/25
Current or Former Applicants for, or Recipients of, VR services	1	02/24
Representative of a disability group that includes individuals with physical, cognitive, sensory, and mental disabilities.	2	03/25

Council Representative	Current Term Number/Vacant	Beginning Date of Term Mo./Yr.
Representative of a disability group that includes individuals with disabilities who have difficulty representing themselves or are unable due to their disabilities to represent themselves.	Vacant	06/21
Section 121 Project Directors in the State (as applicable)	N/A	
State Educational Agency Responsible for Students with Disabilities Eligible to Receive Services under Part B of the Individuals with Disabilities Education Act (IDEA)	1	02/24
State Workforce Development Board	1	02/24
VR Agency Director (Ex Officio)	2	07/19

3. IF THE SRC IS NOT MEETING THE COMPOSITION REQUIREMENTS IN SECTION 105(B) OF THE REHABILITATION ACT AND/OR IS NOT MEETING QUARTERLY AS REQUIRED IN SECTION 105(F) OF THE REHABILITATION ACT, PROVIDE THE STEPS THAT THE VR AGENCY IS TAKING TO ENSURE IT MEETS THOSE REQUIREMENTS.

Kentucky's State Rehabilitation Council (SRC) is established under the Kentucky Office of Vocational Rehabilitation (OVR) by Kentucky Revised Statute (KRS) 151B.245, as the Kentucky Statewide Council for Vocational Rehabilitation (hereafter referred to as "SCVR" or "Council").

The SCVR convenes at least four (4) quarterly meetings each year, in accordance with Section 105(f) of the Rehabilitation Act of 1973, as amended by Title IV of WIOA and 34 CFR 361.17(j). Each quarterly meeting has a hybrid option for both in-person and video teleconference options for members to attend and participate and for members of the public to observe in compliance with the Open Meetings Laws. Minutes from each quarterly meeting of a 2-year period are posted on the OVR website for public viewing.

The SRC's required composition in Section 105(b) mandates at least fifteen (15) members for specific represented categories. The SCVR has fulfilled each applicable category required in Section 105(b) and encompasses an additional four (4) member categories in accordance with KRS 151B.245 to ensure representation for the blind and visually impaired. Currently, the Council has three (3) vacancies. Efforts are being made by the Council to fulfill vacancies identified in the previous section and required in KRS 151B.245. In Kentucky, the Governor has the sole discretion to appoint members to the state's SRC. The Council continues to carry out its functions since "no vacancy affects the power of the remaining members to execute the duties of the Council" as stated in 34 CFR §361.17(f)(2).

4. IN ACCORDANCE WITH THE REQUIREMENTS IN SECTION 101(A)(21)(A)(II)(III) OF THE REHABILITATION ACT, INCLUDE A SUMMARY OF THE COUNCIL'S INPUT (INCLUDING HOW IT WAS OBTAINED) INTO THE STATE PLAN AND ANY STATE PLAN REVISIONS, INCLUDING RECOMMENDATIONS FROM THE COUNCIL'S ANNUAL REPORTS, THE REVIEW AND ANALYSIS OF CONSUMER SATISFACTION AND OTHER COUNCIL REPORTS.

The Kentucky Statewide Council for Vocational Rehabilitation (SCVR) is established under the Office of Vocational Rehabilitation (OVR) by KRS 151B.245 as Kentucky's State Rehabilitation Council (SRC) in accordance with 34 CFR 361.16(a)(2). As part of the agency's commitment, OVR will continue to provide funding support for the SCVR to be used for the publication of the Annual Report and conducting both the Consumer Satisfaction Survey (CSS) and the Comprehensive Statewide Needs Assessment (CSNA). Reimbursement of expenses will be provided to members for expenses incurred related to activities and functions of the Council.

The Statewide Council for Vocational Rehabilitation (SCVR) provided input into the planning of the state plan forums, the state plan and Annual Report. The Council reviewed and analyzed the Consumer Satisfaction Survey (CSS), Comprehensive Statewide Needs Assessment (CSNA) and other reports, such as the Supported Employment Provider Satisfaction Survey. The Council played an active role in the CSNA by participating in initial forums that set the tone for question formation and the information gathering process. Recommendations to OVR were made by the Council from analyzing agency reports and other information related to the delivery of services to consumers presented at quarterly meetings.

The SCVR consists of the following six standing committees to assist in carrying out the functions of the Council: Executive, Policy and Planning, Public Awareness and Legislative, Consumer Services and Program Evaluation, Nominating and Bylaws and Blind Services. The committees played an active role in informing the State Plan, Annual Report, CSNA and CSS by providing feedback, advise and reviewing reports.

Below describes the Council's input from the last program year for program year 2025 – 2026.

State Plan

The Council provided input into the State Plan during the Policy and Planning (PPC) committee meeting and Council quarterly meetings. The PPC provides input on the strategic plan, the state plan, and other components of the program. OVR is currently conducting the 2027 Comprehensive Statewide needs

Assessment (CSNA). There are no changes to the State Plan Modification for the set Goals and Priorities. OVR will work collaboratively with the Council to use the results of the 2027 CSNA upon completion to inform the process for setting the Goals and Priorities for the next State Plan submission. The Council had significant involvement and input in the State Plan modification for Sections (d) Evaluation and Reports of Progress: VR and Supported Employment Goals, (f) Annual Estimates and (g) Order of Selection. Members received ongoing information regarding the submission of the State Plan and all interagency activities related to the Plan

At the January 26 quarterly meeting the Council was provided with an update on the status of the state plan modification due at the end of April. Again, the Council was asked for further input and it was emphasized that the goals and priorities in the current plan will not change under this modification. The required attachments for the modification were provided to the Council for review and comment.

Annual Report

The SCVR Annual Report is overseen by the Public Awareness and Legislative (PAL) Committee. PAL committee provided input and recommendations for the 2024 Annual Report during the committee and full Council quarterly meetings. The committee discussed the annual report, and the theme "Strategizing for Our Future" was chosen and established. Members discussed the format of the report focusing on the work of the Council on the strategic planning process. SCVR Chairperson and Vice-Chairperson reviewed and approved the completed and finalized 2024 Annual Report. The Council began working on the 2025 Annual Report in July and made a recommendation to include more information about the Council members and OVR staff in the report. The Council was informed of the requirement under Senate Bill 103 that OVR includes a fiscal section in the annual report. The 2025 Statewide Rehabilitation Council annual report was finalized and distributed to the Council beginning in January of 2026.

Consumer Satisfaction Survey (CSS) and CSNA

The Consumer Services and Program Evaluation (CSPE) committee oversees the CSS and CSNA. University of Kentucky's Human Development Institute (UK-HDI) was engaged as a vendor to conduct the CSS. It provided a report to the Council with the results and overall findings of the CSS at the March 2025 quarterly meeting. The Council approved the 2024 CSS. The report was sent to the full Council and made available to the public on OVR's website. The Council did express concerns regarding the small sample size of respondents who are blind or visually impaired. A recommendation was made to disqualify the results for the blind and visually impaired sample size of the CSS due to a low proportion as identified by Blind Services

OVR is currently in process of conducting the 2027 CSNA. The Council played an active role by participating in initial forums and the information gathering process. A status update was provided to the Council at the October 2025 quarterly meeting by University of Kentucky, Human Development staff (HDI) conducting the needs assessment. UK/HDI staff reported that survey information was

disseminated across various platforms. All Council members were provided with digital copies of flyers to share with the public. The Council was updated on all activities of CSNA and had opportunities to ask questions and/or make comments. Feedback was also solicited from the Council at the October 2025 quarterly meeting regarding any gaps that should be addressed for the 2027 CSNA. Council members participated voluntarily in activities carried out for the CSNA such as surveys and focus groups. These events were held outside of the regular quarterly meetings that were held where their feedback was captured.

Council Meetings - Recommendations

During the SCVR quarterly meetings, members provided input and made recommendations related to agency reports and functions of the Council. The Council asked about the current rate study that was being conducted and the timeline for the changes to the Supported Employment rates, acknowledging they knew the rates were an issue for providers. The Blind Services Committee expressed concern over the vacancies at the Charles W. McDowell Center for the Blind (McDowell Center) and inquired about the certification process for bioptic driving instructors. The Council inquired about a plan to increase spending for the required 15% for pre-employment transition services. At the request of the Council, OVR made the following presentations to the Council: 1) the importance of accessible word documents; 2) OVR's outreach methods; 3) the VR application process; 4) the CSNA; 5) the CSS 6) Order of Selection; 7) Pre-employment transition services; 8) Supported Employment; and 9) Updated Supported Employment fee structure. The recommendations are listed below.

Order of Selection

OVR consulted with the Council when the agency determined it would not be able to serve all eligible individuals who apply for services. In accordance with the Council bylaws, a special meeting for the Executive Committee was called by the Council Chairperson to discuss the agency's need to implement an Order of Selection (OOS). The meeting was held on January 13, 2025, and a representative from the Client Assistance Program (CAP) was in attendance. The Executive Director gave an overview of the agency's current and projected fiscal data, spending patterns, cost over the last four years and staffing variables contributing to the need to implement an OOS. All priority categories were explained and the overall implications of the OOS. Other measures put in place were briefly discussed, such as the establishment of a wait list, cost sharing and providing information and referrals. The Executive Committee was assured that the decision was not taken lightly, and that the agency had consulted the U.S. Department of Education's Rehabilitation Services Administration (RSA), received technical guidance from the Vocational Rehabilitation Technical Assistance Center for Quality Management (VRTAC-QM), and consulted Cabinet leadership regarding the decision. Overall, the Executive committee viewed the need to implement the OOS as necessary given the information received. The public hearing dates, times and locations were set for February 13, 2025, in the morning and evening at the McDowell Center, February 18, 2025, in the evening at the Carl D. Perkins Training Vocational Center (CDPTVC), and video teleconference only in the afternoon on February 20, 2025.

During the Council's January 2025 quarterly meeting, the Council Chairperson provided a summary of the Executive Committee's special meeting, including the dates for the public hearings. OVR's Executive Director provided a detailed PowerPoint presentation regarding the need to implement an OOS, the implications of the OOS, and how the OOS would be implemented. OVR's Director of Field Services provided further information regarding how cases would be managed, definitions of priority categories and the overall process for the OOS. Council members sought to understand the wait list process, and how the provision of information and referrals to other programs might be affected by an OOS. A representative from OVR's fiscal department attended the meeting to provide an opportunity for Council members to ask questions regarding the projected funds. Two representatives from the CAP, including the Executive Director of CAP, were present. A motion to approve the agency's decision to implement OOS was passed. After the full Council meeting, OVR issued a public announcement about the implementation of OSS that was distributed to Council members, stakeholders, and the public.

On April 7, 2025, a special meeting for the Executive Committee was called by the Council Chairperson regarding an update to OOS and the need to close all priority categories. A representative from the Client Assistance Program (CAP) was invited to the special meeting and was in attendance. The OVR Executive Director explained the need to close all priority categories. Council members made comments, and asked questions. OVR provided answers. After the Executive Committee meeting, a public announcement was sent to the full Council Additionally, a 10-day comment period was given to allow the Council and the public an opportunity to provide written comments by email and mail on the closure of all priority categories.

At the April 2025 quarterly meeting of the Council, OVR provided a detailed presentation regarding OOS and the priority category definitions. OVR gained input from the Council regarding the proposed priority category definitions. Council members felt it was important that the new definitions provided clear definitions and accessible language that provides flexibility. One member made the recommendation of "offering only three priority categories for a more defined and simpler process to determine eligibility."

At the July 2025 quarterly meeting of the Council, OVR Deputy Director provided an update on OOS, the work on the regulations and presented the finalized new priority category definitions for their review and describe to the Council the associated regulatory process for filing the new regulations. The Division Director of Field services made a presentation to the full Council on the application/intake process. In addition, a current metric report for cases served was presented and an update on OOS and the numbers of individuals on the waitlist (1,994).

At the October 20, 2025, quarterly meeting the Division Director of Field Services the current metrics report for cases served, a comparison chart of both program year 2024 and year to date for 2025, open cases by status (10,773) as well as the current number of individuals on the wait list (3,452).

At the January 26, 2026 meeting, The Executive Director gave a comprehensive report regarding OOS and the filing of the regulations. During OOS, OVR will continue to keep in place all cost-saving measures. Vacancies through attrition are not being filled unless it is a critical position where the duties

of the position cannot be assigned to existing staff. Amended regulations, including new priority category definitions, have been filed as both emergency and ordinary regulations. A copy of the regulations is on the Education and Labor website. The public hearing on the emergency regulations is on February 26, 2026, at 1:00 pm and the public comment period ends February 28, 2026. The public hearing on the ordinary regulations is on March 24, 2026, at 11:00 pm and the public comment period ends March 31, 2026. With the implementation of new regulations, the agency will be updating procedures and providing training for staff. OVR currently has 4,566 individuals on the waitlist. Since OVR must treat both Category I and 2 the same 4,426 of them are considered priority Category I. 0VR is now in the review process to begin releasing individuals from the waitlist. Considering application date and priority category, this process will analyze the projected cost of services per person, available funding, caseload size, and counseling staff resources. Based upon these reviews, OVR will then determine how many individuals can be released from the waitlist in a fiscally responsible manner. The review process will be ongoing, and individuals will be released as quickly as resources allow.

5. PROVIDE THE VR AGENCY'S RESPONSE TO THE COUNCIL'S INPUT AND RECOMMENDATIONS, INCLUDING AN EXPLANATION FOR THE REJECTION OF ANY INPUT AND RECOMMENDATIONS.

List each recommendation/input followed by the VR agency response

Recommendation 1

The Council recommended that the use of acronyms be limited during meetings and the full name of acronyms be stated first to facilitate better understanding. In addition, and the Council asked OVR to provide a list of acronyms for each meeting.

Response to Recommendation 1

OVR agrees. OVR will provide a list of acronyms, state the full name of the acronym when speaking and limit the use of acronyms.

Recommendation 2

The Council recommended that the OVR Assistant Director that oversees the Transition Branch make a presentation on Pre-Employment Transition services.

Response to Recommendation 2

OVR agreed. A presentation on pre-employment transition services occurred at the next quarterly meeting.

Recommendation 3

The Council suggests OVR provide Trauma Informed Care training to the Vocational Rehabilitation Counseling Staff.

Response to Recommendation 3

OVR agrees. OVR will require all counseling staff to participate in Trauma Informed Care training.

Recommendation 4

A recommendation was made to perform a comparison of the data for 18- 64 year olds with the overall Kentucky population in the next CSNA.

Response to Recommendation 4

OVR agrees. A request was made to the vendor conducting the CSNA to make a comparison of the data for the 2027 CSNA.

Recommendation 5

The Council recommended the results for the blind and visually impaired section of the Consumer Satisfaction survey be disqualified due to a low sample size.

Response to Recommendation 5

OVR agreed. The HDI principal investigator that oversees the project was present at the meeting and was informed of this Council decision.

Recommendation 6

The Council recommended that the Annual Report contain more information about the Council and OVR staff.

Response to Recommendation 6

OVR agrees. OVR will work with the Council to implement this recommendation for the report.

Recommendation 7

The Council requested that its members be invited to the annual Pre-Employment Transition Services Summitt in September and that

Response to Recommendation 7

OVR agrees. OVR invited the Council members to attend the Pre-Employment Transition Services Summit and one member attended.

Recommendation 8

OVR will provide ongoing updates on the local collaboration project with the Kentucky Department of Education.

Response to Recommendation 8

OVR staff will work with KDE staff in preparing ongoing updates on the local collaboration project with the Kentucky Department of Education as a regular agenda item.

Recommendation 9

A recommendation was made that OVR have three priority categories, instead of four, for a more defined and simpler process to determine eligibility.

Response to Recommendation 9

OVR agrees that the priority categories should be more defined and simple. However, OVR is using four priority categories to clearly define the functional limitations applicable to each priority category.

Recommendation 10

A recommendation was made to invite all Council member to the upcoming "Pre-Employment Transition Services Summit hosted by OVR.

Response to Recommendation 10

OVR agreed to the recommendation and issued an invitation to all Council members to attend the Summit.

Recommendation 11

The Council made the recommendation concerning the annual report that additional information would be included about Council members and OVR staff.

Response to Recommendation 11

OVR accepted the recommendation.

Recommendation 12

A recommendation was made that OVR develop an operations plan or if one already exists OVR would make a presentation on the plan utilized.

Response to Recommendation 12

OVR accepts this recommendation. OVR will be working with Education and Labor Administrative Operations staff on the development of a Continuity of Operations Plan for Services.

B. COMPREHENSIVE STATEWIDE NEEDS ASSESSMENT (CSNA).

Section 101(a)(15), (17), and (23) of the Rehabilitation Act require VR agencies to provide an assessment of:

1. THE VR SERVICES NEEDS OF INDIVIDUALS WITH DISABILITIES RESIDING WITHIN THE STATE, INCLUDING:

A. INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES AND THEIR NEED FOR SUPPORTED EMPLOYMENT;

Executive Summary

The 2024 Comprehensive Statewide Needs Assessment (CSNA) identified several key needs of individuals with the most significant disabilities in Kentucky. The assessment highlights that this population often faces significant challenges in accessing vocational rehabilitation services and employment opportunities due to various barriers.

Key Identified Needs

1. *Access to Specialized Services*
    a. Individuals with significant disabilities require tailored and intensive vocational rehabilitation services, including job coaching, customized employment, and assistive technologies.
    b. Expanded access to mental health support, counseling, and comprehensive care is crucial for those with co-occurring conditions.
2. *Employment Support*
    a. There is a critical need for more inclusive workplaces that offer reasonable accommodations and disability-friendly environments.
    b. Individuals often require assistance with job searching, training, and placement, as well as long-term support to maintain employment.
3. *Navigating Benefits and Services*
    a. Assistance is needed in understanding and navigating government benefits like SSI and SSDI while balancing vocational goals. Fear of losing benefits remains a significant deterrent to employment.
    b. Coordination between agencies and streamlined application processes are necessary to reduce complexity.
4. *Transportation and Accessibility*
    a. Reliable and accessible transportation remains a challenge, particularly for those in rural areas and those requiring mobility aids.
    b. Improved accessibility to buildings and public spaces is needed to ensure equitable participation in employment and community life.
5. *Financial Security*

a. Many individuals with significant disabilities live in poverty due to limited employment options, highlighting a need for more comprehensive economic support.

6. *Awareness and Advocacy*

    a. Raising awareness among employers and service providers about the specific needs of this population is essential for developing effective services.

    b. There is a need for self-advocacy training and family involvement to empower individuals in navigating vocational rehabilitation programs.

Within CSNA, Community Rehabilitation Providers (CRPs) expressed a strong demand for expanded resources to augment existing services, with Supported Employment (SE) being among the most utilized OVR services, as indicated by surveys. Additionally, a shortage of CRP service providers in specific regions further exacerbated the challenges faced by individuals with MSD in accessing needed SE services. When surveyed regarding SE services, an overwhelming majority of OVR staff and counselors agreed that emphasizing SE was important, with 57% of those surveyed indicating satisfaction with the number of SE providers and services available to transition-aged consumers. This sentiment was echoed in transition-age youth surveys, where nearly all agreed on the importance of having access to SE services, with 70% expressing satisfaction with their availability. Key informant interviews with supported employment consumers and providers revealed a vital partnership between Supportive Employment Specialists (SES) and OVR, characterized by excellent communication and mutual support in meeting consumer's needs. However, challenges persisted, notably the need for increased public awareness of services and enhancements in the referral process to bridge the gap for individuals with MSD seeking meaningful employment opportunities. Furthermore, transportation for individuals with MSD was consistently noted as a significant barrier to accessing supported employment services, particularly in the more rural areas of the state where longer commutes were often required.

Introduction

This report provides a summary and the findings of the activities of the Office of Vocational Rehabilitation (OVR) to comprehensively assess the various vocational rehabilitation (VR) needs in the Commonwealth of Kentucky.

A Comprehensive Statewide Needs Assessment (CSNA) was conducted in 2023, and the results were available early 2024. 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:

1. Services to individuals with the most significant disabilities, including their need for supported employment services.

2. Services to individuals who are 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.

The CSNA provides a summary of the surveys and the findings of OVR activities to understand the needs and concerns of the disability community that we serve throughout the state. The report assists KYOVR in recognizing its current state and in making any adjustments needed based on those findings.

In addition to the triennial assessment, OVR uses a variety of methods to further inform the state plan the needs of the disability community within the state. By obtaining information and data from the Statewide Council for Vocational Rehabilitation (SCVR) meetings, staff training and surveys, the Consumer Satisfaction Survey (CSS), public forums, and other reports, OVR is better situated to address service concerns or issues and equitable access to services more strategically, and therefore more effectively. Through this process of gathering information, the agency is able to plan for the evolving needs of the disability community and also for staff to meet those needs.

OVR previously conducted a comprehensive needs assessment in 2021. Federal regulation requires the needs of individuals with disabilities in the state be assessed every three years. The current study (2023) is also intended to identify and provide recommendations for trends in 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.

2023 Comprehensive Statewide Needs Assessment

The current comprehensive needs assessment was conducted in 2023 with guidance provided by the SCVR, as required by 34 CFR 361.17(h)(3). OVR and the SCVR 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.

The CSNA was implemented to identify gaps in existing services that can be reduced through programs and policies by the OVR. A mixed method of online surveys and forums was used to collect insights about the rehabilitation needs of Kentuckians with disabilities. The insights gained from the CSNA will provide the information needed for the development of the State Plan for services. The Needs Assessment was carried out by OVR staff working with the staff and faculty at the Human Development Institute (HDI).

Kentucky's 2023 CSNA contains both quantitative and qualitative data addressing the needs of the state vocational rehabilitation system. The data collection included:

1) A review of OVR metrics data of individuals receiving services;

2) Demographic information for Kentucky;

3) A review of the Satisfaction Survey of closed cases successful and unsuccessful;

4) Input from stakeholder focus groups;

5) Input from online surveys;

6) Facilities assessment of maintenance needs;

7) Strategic planning;

8) Input from public forums; and

9) Data reports and feedback from the Rehabilitation Services Administration off-site monitoring and the draft monitoring report.

Environmental Scan

The following environmental scan was conducted with the goals of 1) establishing a demographic profile of Kentuckians with disabilities who are potentially eligible for services through the OVR; and 2) understanding some of the unique characteristics of working-age adults with disabilities in Kentucky.

Demographic Overview

Kentucky's total population was estimated to be 4,428,274, with 801,061 individuals identified as having a disability. Kentuckians with disabilities constituted 18.1% of the total population, placing Kentucky among the top three states nationally in terms of disability prevalence. Notably, Kentucky's disability rate surpassed the national average (13.4%) by nearly 5%.

Age

Since OVR services are available to Kentuckians with disabilities who are experiencing barriers to employment, data presented will focus on working-age adults (aged 18 to 64) who identify as having a disability, capturing the lion's share of OVR's target population. Kentucky's population of working-age adults (18-64) was estimated at 2,656,255. Within this group, approximately 433,308 individuals (or 16.31%) identified as having a disability. The disability prevalence rate for working-age Kentuckians was 5.29% higher than the national average (11.02%).

Gender/Sex

Among Kentuckians identified as having a disability, females slightly outnumber males, constituting 51% of this population. The gender breakdown of Kentuckians with disabilities was consistent with national averages.

Race/Ethnicity

The racial/ethnic profile of Kentuckians with disabilities was as follows: White (85.67%), Black or African American (7.33%), Hispanic/Latino (2.36%), Asian (0.55%), American Indian/Alaskan Native (0.15%), Two or more races (5.23%), and Other (0.98%).

Disability Type

The American Community Survey (ACS) assesses disability type using the following (non-exclusive) six categories: Hearing, Vision, Cognitive, Ambulatory, Self-Care, and Independent Living. For working-age Kentuckians with disabilities (433,608), cognitive impairments were the most common disability (46.1%), followed by ambulatory or mobility impairments (44.1%), independent living limitations (35%), vision impairments (20.9%), hearing impairments (19.73%), and finally self-care limitations (15.2%).

Educational Attainment

Data for educational attainment included adult residents aged 25 and older in the Commonwealth of Kentucky. Data are presented for both people with and without disabilities for reference. In total, 21.3% of Kentuckians with disabilities have less than a high school education, compared with 8.9% of Kentucky residents who do not have disability (+12.4% gap). Similarly, 38.4% of those with disabilities have only a high school diploma or equivalent versus 30.7% of those without disabilities (+7.7% gap). Just over a quarter of both Kentuckians with disabilities (26.7%) and those without disabilities (28.5%) have an associate degree or some college (26.7%; -1.8% gap). Next, only 8.4% of Kentuckians with disabilities have earned a four-year college degree, while 18.8% of those without disabilities have earned a four-year college degree (-10.4% gap). Finally, 5.2% of Kentuckians with disabilities had earned a credential beyond a four-year degree compared to 13.1% of those without disabilities (-7.9% gap).

Veterans Status

There are currently 118,466 civilian veterans living in the commonwealth of Kentucky. Of those civilian veterans, just over one-quarter (26.4%) have a service-connected disability.

Special Education Services

Youth with disabilities in Kentucky are provided access to a free and appropriate public education in the least restrictive environment under the IDEA (Individuals with Disabilities Education Act). For academic year 2022-23, 16.5% of Kentucky students (109,672 students) received special education services under the IDEA. This includes an Individualized Education Plan (or IEP) for each student that includes transition planning at age 14. The top five disability categories served included: speech or language impairment (27%), specific learning disability (16.6%), other health impaired (14.9%), developmental delay (12.2%), and autism (9.9%).

Data available on transition outcomes for Kentucky students with IEPs that exited high school is available via the Kentucky Post School Outcomes (KYPSO) annual report. Most recent data from the 2020-21 academic year indicated that 4,687 students with an IEP exited high school. Of those students

who exited high school 39.9% were employed in a competitive integrated setting within a year of exiting high school, whereas 23.5% were employed in a non-competitive integrated setting, and 36.6% were not engaged in the workforce. A total of 16% of those students with IEPs who exited high school were engaged in higher education.

Employment Rate

The employment rate for Kentuckians with disabilities aged 18 to 64 was 32.3%. This was 8.4% lower than the US average for Americans with disabilities (40.7% employed) and 44.2% lower than the average for Kentuckians without disabilities (76.5% employed). Kentucky's disability employment gap ranked among the three largest in the US.

A closer examination of employment rate by county type shows that the employment gap in Kentucky (42.3%) was even larger for the state's rural population. In Kentucky's 35 metropolitan counties, the employment rate for those with disabilities was 36.5% compared to 79.6% for those without disabilities (-43.1% gap). For Kentucky's rural counties, the disability employment rate was 25.2% (over 10% lower compared to the metropolitan counties) compared to 70.7% for those without disabilities (a 45.5% gap).

Poverty Rate

While employment is a key contributor to an individual's overall economic well-being and security, it is also helpful to examine poverty rates for additional economic context. As may be expected with the substantial employment gap observed for Kentuckians 18-64 with disabilities, nearly one-third (31.2%) of this population was living below the poverty line, compared to only 12.8% of their non-disabled counterparts (+18.4% gap). This puts Kentucky 5.8% higher than the national average (25.4%).

Similar to employment rates, the poverty rates observed were significantly higher in the rural areas of the state. For Kentuckians with disabilities in the metropolitan counties of the state, 27.6% were living below the poverty line, compared to 34.7% of those living in the rural counties. Furthermore, the most rural (or non-core) counties observed the highest rate of poverty (35.7%). For the veterans in Kentucky living with service-connected disabilities, the poverty rate is currently 18.7%.

Benefits Receipt

While receipt of SSI/SSDI benefits provides a needed safety net for many Americans with disabilities, it has frequently been cited as one of the most significant barriers to entering/staying in the workforce. In Kentucky, 9.8% of the resident working-age population (aged 18-64) received either SSI or SSDI benefits. Nationally, that puts Kentucky behind only West Virginia (11.1%) in the proportion of working age adults in the state who receive either SSI or SSDI benefits. This means that one in ten working-age Kentuckians are currently receiving one or both federal benefits. Most recent data have indicated that there are just over a quarter million beneficiaries between the ages of 18 and 64 in Kentucky with 179,666 receiving SSDI benefits, 75,188 receiving SSI only, and 26,340 receiving both SSI and SSDI.

Income

Another helpful economic indicator is examining the annual median full-time income for a population of interest. In the Commonwealth of Kentucky, those without disabilities have a median full-time income of $46,318, whereas Kentuckians with disabilities earn a median full-time income of $40,689 (an annual gap of $5,629).

Housing Burden

Access to affordable, secure housing is an integral piece of economic stability. Lack of affordable housing production, increasing housing prices, and stagnant/lower wages have led to many individuals across the Commonwealth experiencing a housing burden. The impact has been especially felt by historically marginalized populations, including those with disabilities. Housing burden is defined as households that spend more than 30% of their income on housing costs and utilities. Most recent data have indicated that nearly one-third of working-age (18-64) Kentuckians with disabilities (30.25%) experience housing burden. This is over 12% higher than the housing burden rate observed in non-disabled counterparts (18%).

Health Insurance

Access to healthcare and the presence of health insurance coverage are critical for many individuals with disabilities to maintain their overall wellness, manage any ongoing conditions, and be able to afford needed treatments and medications. Currently 94.4% of Kentuckians with disabilities have health insurance coverage with 38.3% having access to private coverage and 66.2% holding some level of public coverage.

[1]https://data.census.gov/table/ACSST1Y2022.S1810?g=010XX00US

[2]https://data.census.gov/table/ACSST1Y2022.S1810?g=040XX00US21

[3]https://www.ssa.gov/policy/docs/statcomps/di_asr/2022/sect05.html

Case Management System Metrics Overview-FFY 21-23

This section is dedicated to providing an overview of the aggregate case data available from the Kentucky Office of Vocational Rehabilitation (OVR) for federal fiscal year (FFY) 2021 through FFY 2023. Through this analysis, we aim to offer insights into the demographics of OVR consumers, a comparison of the population of working-age Kentuckians with disabilities to OVR's consumer base, case outcomes and expenditures, and employment data.

Consumer Demographic Overview

Over the three-year period of review, OVR closed a total of 38,465 cases. Over half (54.1%) of OVR consumers identified as male and 45.9% as female. The mean age of individuals served by the KY OVR during this period was 38.97 years, with a median age of 35 years. The age range of clients varied from 15 to 97 years. The distribution of OVR consumers across age groups showed that transition-age youth

(aged 15-25) made up over one-third of OVR consumers (34%), followed by mid-career consumers (aged 40-59; 27.1%), early career consumers (aged 26-39; 23%), late career consumers (aged 60-70; 11.4%), and finally, consumers over the age of 70 (4.5%).

Race/Ethnicity

In terms of race/ethnicity, a majority of OVR consumers identified as White (79.9%), followed by Black or African American (10%), Hispanic/Latino (of any race; 8.8%), Asian (0.3%), Native American or Alaskan Native (0.2%), Hawaiian or Pacific Islander (0.1%), and two or more races (0.6%).

Primary Impairment/Disability

OVR collects data related to a consumer's reported disability. The main category collected is the primary source of impairment or disability that has resulted in the consumer experiencing a barrier to attaining or retaining employment. The five most common reported primary impairments among OVR consumers included psychosocial and mental disabilities (30.9%), deafness and hearing loss (29.1%), cognitive disabilities (21.2%), physical and mobility impairments (14.2%), and blindness and other visual disabilities (4.2%).

Area of Residence

The data showed that 54.4% of OVR consumers were from the state's metropolitan counties while 45.6% were from rural counties. Further, just over one-third (34%) of OVR consumers resided in the state's Appalachian region.

Employment and Income

At the application stage, a majority of OVR consumers were currently unemployed (58.7%). A substantial portion of consumers (39.8%) reported being engaged in competitive integrated employment, while the remaining 1.5% were employed in non-integrated settings. At application, OVR consumers who were employed (n = 10,065) reported earning a median annual income of $31,200 (avg annual income of $32,915.79) working a median of 40 hours per week (avg of 32.9 hours per week) at a median wage of $15 per hour (avg of $19.24 per hour). In terms of financial support, 59.7% of consumers at application indicated they relied on others (e.g., family and friends, social security, or public assistance) as their primary income source. Moreover, a total of 22% of OVR consumers reported receiving either Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) benefits at the time of application.

Comparison to Kentuckians with Disabilities

This section examines the overall demographic profile of the consumers served by OVR from FFY 21-23 comparted to the profile of working-age (18-64) Kentuckians with disabilities established in the environmental scan.

Gender/Sex. While 51% of Kentuckians with disabilities identified as female, less than half of OVR consumers were female (45.9%). This finding underscores a need for OVR to better utilize targeted

outreach toward women with disabilities across the state. However, when removing cases that never reached the Individualized Plan of Employment (IPE) stage of OVR services (i.e., began formally receiving services), the gender/sex composition of OVR consumers is much closer (48.4% female) to the known demographic profile of Kentuckians with disabilities. Given that 58.6% of consumers who exit OVR before the IPE stage are male and nearly half (45.2%) are transition-age youth, the gender gap observed is likely largely due to a disproportionate number of young males receiving school-based transition services (such as Pre-ETS).

Race/Ethnicity. A direct comparison of racial and ethnic identities of OVR consumers to the racial/ethnic breakdown of Kentuckians with disabilities revealed that OVR served a higher proportion of consumers who identified as Black of African American (OVR: 10%; KY: 7.33%), Hispanic or Latino/a (OVR: 8.8%; KY: 2.36%), Native American or Alaskan Native (OVR: 0.2%; KY: 0.15%), and Hawaiian or Pacific Islander (OVR: 0.1%; KY: 0%). The only minority population group that OVR was not proportionately, or better serving was consumers who identified as Asians (OVR: 0.3%; KY: 0.6%). The overall data suggests that OVR is excelling in their efforts to provide services to marginalized population groups, particularly Kentuckians who identified as Hispanic or Latino/a. The low proportional service rate for Kentuckians of Asian extraction is of particular note given the documented rise in discrimination against Americans of Asian descent in the wake of the COVID-19 pandemic.

Disability Type. The differences in the way that the American Community Survey (ACS) and OVR collect and categorize disability data make a direct comparison somewhat limited in value. However, given the similarity in how visual and hearing conditions are defined and tracked, a comparison of those categories is warranted. As such, the service data revealed that OVR services appeared to be reaching a proportionally higher number of consumers with hearing impairments (OVR: 29.1%; KY: 19.7%) and a proportionally lower number of consumers with visual impairments (OVR: 4.2%; KY: 20.9%). The findings on hearing impairments underscore the effectiveness of OVR's specialized service program for consumers who are deaf or hard of hearing and reveal a possible area of improvement, that is provision of VR services to Kentuckians with visual impairments.

Employment. Data available from the ACS on working-age Kentuckians with disabilities indicated that their employment rate was currently 32.3%, significantly lower than the US average (40.7%). OVR data on consumers served showed that 39.8% of OVR consumers were employed at the time of application. This data may suggest that OVR is disproportionately providing services to Kentuckians with disabilities who are currently employed and reveals a possible area of focus, doing more targeted outreach with unemployed Kentuckians with disabilities.

SSI/SSDI Beneficiaries. Data collected via the Social Security Administration (SSA) revealed that 9.8% of the resident working-age population in the Commonwealth receive SSI or SSDI benefits. That is the second highest SSI/SSDI beneficiary rate in the US. Data collected by OVR from consumers indicated that 22% of their consumers reported receiving SSI or SSDI benefits at the time of application, meaning that OVR is serving a proportionally higher number of consumers with SSI/SSDI benefits. Given that reducing reliance on SSI/SSDI benefits is a meaningful outcome of vocational rehabilitation services,

this data would indicate that KY OVR is appropriately reaching SSI/SSDI beneficiaries with their services.

Outcomes

There are numerous reasons why a consumer with an open case at KY OVR may have their case closed. The main categories of case closure examined for the purpose of this analysis included an unsuccessful case closure prior to the IPE stage of services (i.e. exit before IPE), an unsuccessful case closure after the consumer had established an IPE (i.e. exit after IPE), and a successful case closure, which is when a consumer is engaged in competitive integrated employment and no longer requires OVR services. Of the 38,465 cases closed by OVR from FFY 21-23, over a quarter (27.8%) resulted in a successful case closure, nearly half of the cases (49.9%) never made it to the IPE stage, and the final 22.3% resulted in an unsuccessful closure after an IPE had been established.

*Exit Before IPE***.** Nearly half (49.9%) of all OVR cases closed in the three-year review period exited unsuccessfully from services before the IPE stage of services. Examples of consumers exiting at this stage includes individuals who exited from application, from accepted, from referral, from potentially eligible as a result of receiving pre-ETS services, and those who were ineligible from services. The three most common reasons listed for consumers exiting before IPE included "all other reasons" (38.7%), no longer interested in services (32.3%), and unable to locate or contact (25.5%).

*Unsuccessful Closure after IPE***.** These cases, representing 22.3% of all case closures, got through the IPE phase of services and were closed as unsuccessful. Examples of unsuccessful closure after IPE could include a consumer no longer interested in services, a consumer being employed in a non-competitive integrated setting, and someone who is not able to be located or contacted. The three most common reasons for unsuccessful closure after IPE for OVR consumers were unable to contact or locate (40.1%), no longer interested in services (33.8%) and "all other reasons" (13.6%).

Case Expenditures and Service Duration. Cases that were closed unsuccessfully after IPE had a median case expenditure of $3,462.46 (avg of $5,836.92; ranging from $10 to $794,728) and a median service duration of 729 days (avg of 1033.47 days; ranging from 6 days to 10,629 days). The case expenditure and service duration data were heavily skewed by older cases with higher overall case expenditures.

*Successful Closures***.** A successful case closure at OVR occurs when a consumer achieves competitive integrated employment and no longer requires OVR assistance. The overall successful case closure rate for all closed cases from FFY 21-23 was 27.8%. When eliminating the cases that never reached the IPE stage (i.e. actually received OVR services), the case success rate rises to 55.5% (10,699 successful case closures).

Case Expenditures and Service Duration. Successful case closures had a median case expenditure of $3,123.74 (avg of $6,384.05; ranging from $6.84 to $407,094) and a median service duration of 355 days (avg of 692.01 days; ranging from 93 days to 7,144 days). The case expenditure and service

duration data for successful closures were also positively skewed by older cases with higher overall case expenditures. Compared to the unsuccessful closures after IPE, successful cases were (at the median point) 9.88% less costly and about half as long (51.3% shorter case durations). Cases that were closed unsuccessfully after IPE had a median case expenditure of $3,462.46 (avg of $5,836.92; ranging from $10 to $794,728) and a median service duration of 729 days (avg of 1033.47 days; ranging from 6 days to 10,629 days). The case expenditure and service duration data were heavily skewed by older cases with higher overall case expenditures. These findings support the vocational rehabilitation literature which suggests that a higher intensity of services (i.e. more services delivered over a shorter period of time) supports successful VR case outcomes.

Successful Closure Income and Support. For the OVR consumers whose cases ended in competitive integrated employment, a median annual income of $33,280 (avg of $35,731.28) was reported at a median of $16 per hour for 40 hours per week (avg. of $20.21 per hour for 34 hours per week). Compared to this group's income levels at application, that represented a median annual increase of $15,808 (avg increase of $19,178.56). Further, 91.1% of these cases reported being primarily reliant on their own income (a 30.2% increase from application levels) and only 14.2% reported receiving SSDI/SSI benefits (a 1% decrease from application levels).

Year by Year Trends

The closure data for FFY 2021 through 2023 indicated a steady increase in the number of cases closed by OVR. In 2021, there were 10,908 closures, representing 28.4% of the total closures. This number increased to 11,410 (29.7%) in 2022 and further rose to 16,147 (42.0%) in 2023. This upward trend in closures suggests an increased demand for vocational rehabilitation services in the state and could be indicative of post COVID-19 labor force engagement rebound for Kentuckians with disabilities.

Successful Case Closures

The closure type analysis revealed significant shifts over the three-year period. Successful closures (among those cases that reached the IPE stage) increased from 50.6% in 2021 (2,756 successful closures), to 55.9% in 2022 (3,282 successful closures), and finally to 58.6% in 2023 (4,661 successful closures). OVR not only increased the proportion of successful closures each year over this three-year span, but also closed more cases each year, resulting in a steady increase in the raw number of successful case closures in addition to the increased case success rate.

Service Duration

For cases that made it past the IPE phase in FFY 2021, the median service duration was 617 days (avg of 946.47 days). The following year (FFY 2022) the median service duration decreased to 470 days (avg of 870.65 days). In the final year of the review period (FFY 2023) the median service duration further decreased to 389 days (753.73 days). This three-year trend shows a dramatic reduction in the number of days cases spent actively in service, with an overall 37% decrease in the median service duration from FFY 21 to 23.

Case Expenditures

For cases that made it past the IPE phase in FFY 2021, the median case expenditure was $3,277.58 (avg of $6,109.77). The median case expenditures remained relatively steady in FFY 2022 with a median expenditure of $3,205.80 (avg of $6,118.12). Again, the year over year amounts were relatively steady into FFY 2023 where consumers had a median case expenditure of $3,210.95 (avg of $6,201.34). So, while the service duration of OVR cases reduced dramatically over the three-year period, case expenditures remained relatively stable, suggesting that OVR consumers were receiving a similar level of services over a significantly shorter period of time.

Income Source

The first year (FFY 2021) of this review saw OVR boost the number of consumers served who were able to primarily rely on their own income sources by 17.9% (from 33.5% at application to 51.4% at closure). The following year the increase was 15.2% (from 40.1% at application to 55.3% at closure). Finally, FFY 2023 saw a 13.4% increase in reliance on self-income (from 45.1% at application to 58.5% at closure). While the overall gains in reliance on self-income reduced each year, the percentage of consumers who were reliant on their own income sources at closure steadily increased each year from 51.4% in 2021 to 58.5% in 2023.

SSI/SSDI Beneficiaries

For FFY 2021, consumers that received OVR services saw a 1.5% decrease in receipt of SSI/SSDI benefits (from 22.2% at application to 20.7% at closure). The following year (FFY 2022), consumers reported a 1.2% decrease in benefits receipt (from 22.5% at application to 21.3% at closure). Finally, in FFY 2023, OVR achieved a three-year best, with a 2.3% reduction in SSI/SSDI beneficiaries (from 21.8% at application to 19.5% at closure).

Annual Income Changes

For the successful OVR case closures in FFY 2021, consumers reported a median annual income increase of $21,673.60 (from $9,422.40 at application to $31,096 at closure). FFY 2022 saw a median increase of $17,628 (from $14,612 at application to $32,240 at closure) for successful case closures. Finally, OVR successful closures in FFY 2023 reported a median annual income increase of $13,104 (from $23,296 at application to $36,400 at closure). Similarly, to income source, the amount of increase got smaller each year, but the overall earnings at closure increased each year from $31,096 in FFY 21 to $36,400 in FFY 23.

CSNA Methodology

The Concerns Report Methodology, conceived by researchers at the University of Kansas in the 1980s, is a Participatory Action Research framework extensively utilized for eliciting pertinent consumer concerns and establishing an agenda for essential changes in both policy and service provision. This

methodology revolves around identifying perceived strengths and issues within a specific demographic, resulting in a comprehensive catalogue of strengths and weaknesses pertaining to policy and practices in a given domain. It goes further by offering recommendations aimed at preserving identified strengths and remedying weaknesses. What sets this methodology apart is its inclusive approach—individuals with disabilities act as partners in the CRM research process, actively contributing to the selection of data collection elements, determining effective data collection methodologies, participating in analysis, interpreting results, and devising problem-solving strategies, thereby ensuring their voices are integral in decision-making processes.

The HDI Evaluation Team is employing the Concerns Report Methodology to drive the KYOVR CSNA through a multifaceted approach. This involves conducting focused discussions via focus groups involving consumers with disabilities, community rehabilitation providers, and OVR staff members. These interactions aim to gather critical insights that will directly shape the survey items tailored for these groups, facilitating the creation of a comprehensive list delineating OVR's strengths and areas necessitating improvement. Moreover, these survey results will inform recommendations made to OVR as a result of the CSNA. Importantly, this methodology extends beyond survey creation. It encompasses post-survey forums designed to provide constituents with platforms to contribute feedback on the survey outcomes and the subsequent recommendations, ensuring their perspectives continue to steer the decision-making process within the OVR, promoting inclusivity, and aligning strategies more effectively with the real needs of the community.

The culmination of priority concerns exposed in all methods of assessing the needs for the state from the most recent CSNA were:

1. The recruitment, training and retention of a competent workforce of staff with specialized knowledge in the field of rehabilitation.
2. Community Rehabilitation Provider Capacity inclusive of services operations (staff, recruitment, training, data collection), transition services and referrals and funding from OVR.
3. Increased outreach for the area of employer engagement and public awareness to increase opportunities for services and increased employment outcomes.
4. OVR will ensure all information, communications and technology is accessible so that everyone will have equal access to agency services and resources.
5. Increased efficiency in agency processes in order to serve consumers in a more timely and effective manner.

The concerns identified above align with the goals and priority areas of 1) Sound Fiscal Management, 2) Quality Assurance, 3) Staff Resources and 4) Consumer Services and 5) Public Awareness. For the area of Provider Capacity, the concerns align with the goals set for the distribution of Title VI, Part B Funds.

Focus Group and Results

The HDI Evaluation Team has conducted focus groups with SCVR, OVR staff, Community Rehabilitation Providers, and finally with public constituents. Each focus group and corresponding themes are discussed below.

Focus Group 1: Statewide Council for Vocational Rehabilitation (SCVR)

The SCVR focus group was conducted on 10/23/23 at 1:00 PM and resulted in the following themes and subthemes.

1. Services:

- Core offerings or programs provided by the organization.
- Considerations or challenges related to transportation services.
- Offering or promoting services without cost-sharing obligations

2. Knowledge/Expertise:

- Demonstrating proficiency and specialized knowledge within the team or organization.

3. Networks:

- Strong connections or partnerships within the industry or community.

4. Promoting Services:

- Challenges or strategies related to advertising or making services known to the public.
- Opportunities to enhance marketing strategies and target specific audiences effectively.

5. Hiring and Retaining Staff:

- Challenges in recruiting and maintaining a competent workforce.

6. Getting and Retaining CRPs (Consumer Rehabilitation Providers):

- Efforts and challenges related to attracting and maintaining service providers.

7. Funding:

- Concerns, limitations, or uncertainties regarding financial resources.

Focus Group 2: Community Rehabilitation Providers (CRPs)

The HDI Evaluation Team conducted a virtual focus group with community rehabilitation provider administrators and staff on 10/31/23 at 10:30 AM. This focus group resulted in the following themes and sub-themes.

1. Communication and Relationship Management
    - Emphasis on open communication between OVR, counselors, and CRPs.
    - Challenges with counselor and consumer communication.
    - Lack of community understanding about OVR services.
2. Service Delivery and Support for Consumers
    - Insufficient funding impacting service provision.
    - Need for better vetting of consumers and clearer expectations.
    - Challenges with transportation options and service availability
3. Challenges with Pre-Employment Transition Services (Pre-ETS)
    - Issues with the rollout, sustainability, and accessibility of Pre-ETS.
    - Desire to restore original services and funding levels.
4. Provider Support and Collaboration
    - Calls for transparent and inclusive long-term planning.
    - Desire for increased support, financial transparency, and involvement of CRPs.
    - Advocacy for CRP needs, cultural shifts, and regular budget examination.
5. Training and Resources
    - Need for more training and resources for counselors and CRPs.
    - Calls for standardized training, quality-focused training for CRPs, and better tools/resources.
6. Process Efficiency and Timeliness
    - Concerns about lengthy processes, authorization delays, and intake procedures.
    - Desire for better systems and technology to streamline communication and processes.
7. Workforce Issues and Caseload Management
    - Counselor overload and overwhelmed staff.
    - Need for appropriate caseload numbers and additional staff training.
8. Flexibility and Adaptability
    - Desire for a more flexible and adaptive approach to service delivery.

- Need for innovative solutions, advanced technology, and leveraging current workplace shortages.

Focus Group 3: OVR Staff

A focus group was conducted with OVR staff and counselors on 11/02/23 at 2:00 PM. The following themes and subthemes emerged from this focus group.

1. Staffing Challenges and Recruitment

- Difficulty in finding qualified candidates.
- Long-term employees and retention issues.
- Need for competitive pay and benefits.
- Short-staffed offices.

2. Internal Operations and Accessibility

- Internal accessibility updates needed.
- Office updates required.
- Case management system improvements.
- Redundant paperwork and processes.
- Lack of policy guidance and procedural limitations.

3. External Communication and Promotion

- Strengthening communication post-pandemic.
- Better promotion of services to the public.
- Communication with special education (SPED) and contractors/vendors.
- Lack of Consumer Rehabilitation Providers (CRPs).

4. Service Enhancement and Accessibility

- Opportunities for staff/counselor training and continuing education.
- Accessibility assessments and updates needed.
- Improving services for independent living (IL).
- Removal of specialized caseloads and transition youth emphasis.
- Transportation options and no cost-sharing services.

5. Technology and Office Infrastructure

- Sub-par Commonwealth of Technology (COT) office services.
- Difficulty with technology updates and system navigation.
- Lack of technology updates in OVR offices.

6. Consumer Needs and Services

- Inability to handle all consumer needs.
- Emphasis on income increase and no cost-sharing services.
- Lack of specialized caseloads and CRPs.

7. Evaluation and Work Environment

- Counselor evaluations appropriateness.
- Increased access to quality professional development opportunities.
- Focus on improving work environment and reducing redundancy in processes.

Focus Group 4: Public

Two public focus groups were conducted by the HDI Evaluation Team on 11/14/23 at 10:30 AM and at 7:00 PM. The following themes and subthemes emerged from these groups.

1. Service Provision:

- Various types of services catered to youth, specific needs, and complementary support.
- Consistency and wide-ranging support within services provided.

2. Accessibility and Communication:

- Challenges in reaching staff members and the discouragement associated with multiple attempts.
- Difficulty with website usability and contact information accessibility.
- Weak internal communication structure within the organization.
- Long wait times and difficulties in scheduling appointments for consumers.

3. Staffing and Workload:

- Understaffing leading to overworked and overwhelmed current staff.
- Need for more OVR staff to meet consumer demands.

4. Consumer Interaction and Support:

- Compassionate and caring attitude of counselors while addressing consumer needs.
- Efforts made by counselors to ensure consumers receive maximum benefits.
- Education needed for consumers on effective communication methods with OVR.

5. Technology and System Challenges:

- Outdated phone systems and websites posing difficulties for consumers.
- Privacy concerns regarding consumer information shared with OVR.

6. Consumer Awareness and Outreach:

- Need for outreach and marketing campaigns to raise awareness about OVR services.
- Stigmas preventing consumers from accessing OVR services need to be addressed.

7. Process Improvement:

- Need for improved internal processes, including expedited processes for clients and conducting exit interviews.

8. Partnerships and Resources:

- Call for creating more partnerships to expand resources and support for consumers.

CSNA Survey Summaries

A. Consumer Survey

The OVR Consumer survey has received 89% of the target completion rate with a total of 873 responses. Consumers with disabilities themselves made up 81% of survey respondents. Survey respondents were primarily female (61%) and resided in 96 of Kentucky's 120 counties. The most represented disabilities among respondents were deafness/hard of hearing (40.5%), behavioral/mood disorder (21.8%), and other physical impairment (13.3%).

In terms of the Concerns Report issues that were generated from the OVR Consumer/Public focus group, each of the 18 items were rated as important by the respondents (avg importance rating of 93.6%). The final Concerns Report concluded that 100% of the items were viewed as strengths or moderate strengths by OVR consumers, with 17 of the 18 being rated as strengths (having a satisfaction rating of 75% or higher). The items that garnered the highest satisfaction ratings included: OVR provides opportunities for consumers to give feedback and listens to their concerns (90%), OVR counselors and staff are professional and helpful (90%), OVR counselors are dedicated to providing quality services (89%), OVR physical locations are accessible (89%), and OVR provides accessible and easy to use communication options to consumers (89%).

Over half of the respondents were employed full-time (52%) and an additional 17% were employed part-time. Most (83%) reported they were satisfied with their current job and were secure in their employment (86%). Many respondents indicated their technology needs were met (73%) and smartphones (77.6%) and computers (73.6%) were by far the most commonly used types of technology utilized. Consumers were largely satisfied with the OVR experiences (81.9% satisfaction rating) and most (89.2) would recommend OVR services to someone who needs assistance.

B. Counselor/Staff Survey

The OVR Counselor/Staff survey exceeded the target completion goal by 143% and received 320 total responses. The counselor/staff survey respondents were primarily female (75%), both counselors and staff had representation (41% and 59%, respectively), and all 19 OVR districts in the Commonwealth were represented. In terms of the Concerns Report issues that were generated from the OVR Counselor/Staff focus group, each of the 19 items was rated as important by the respondents (avg importance rating of 92.6%). The final Concerns Report concluded that 79% of the items were viewed as strengths or moderate strengths by OVR counselors and staff. The strengths with the highest satisfaction ratings were related to a positive workplace environment and services provided to OVR consumers. The identified areas for improvement included the need for more staff and resources to serve consumers, and a need to reevaluate the current CMS system.

Counselors and staff were generally very positive about their work at OVR. Overall, the OVR counselors and staff indicated that they were satisfied with their work (83% satisfaction rate). This included positive satisfaction ratings for the communication and collaboration within OVR (71% satisfaction rate), the resources and tools available to them (70% satisfaction rate), and their current compensation and benefits packages (68% satisfaction rate). The most common issues noted by counselors and staff who were dissatisfied with their jobs were base salary (77%) and workload (52%). A majority of counselors and staff indicated that their technology needs were met (72%) and that they believed they could complete their work effectively while telecommuting (80%).

The survey respondents seemed in agreement that there is a strong need for more Community Rehabilitation Providers (CRPs) and that more resources are needed to further develop and expand the existing CRPs. This is in line with the sentiment from the Concerns Report which indicated that counselors and staff believe they need more resources to be able to effectively serve their consumers. Some of the most commonly utilized CRP services included traditional supported employment (77%), employment and retention (74%), job development (68%), person-centered job selection (64%), and individual placement support (IPS; 53%).

C. Youth/Transition Survey

The OVR Youth/Transition survey surpassed the number of target completions by 114% and received a total of 273 responses. Parents or guardians of consumers with disabilities comprised more than half of survey respondents (51.3%) and transition-aged consumers made up another 42.5% of the responses. Over half of Kentucky's 120 counties (65 in total) were represented by survey respondents. The most

commonly represented disabilities included autism (36.8%), behavioral/mood disorder (26.4%), and intellectual disability (21.5%).

In terms of the Concerns Report issues that were generated from the OVR Consumer/Public focus group, all 20 items were rated as important by the respondents (avg importance rating of 90.1%). The final Concerns Report concluded that 100% of the items were viewed as strengths or moderate strengths by OVR transition-aged consumers, with three-quarters of the items rated as strengths (having a satisfaction rating of 75% or higher). The items that garnered the highest satisfaction ratings included: OVR provides opportunities for consumers to give feedback and responds to their concerns (84%), Student preferences for job goals and assistive technology are prioritized by OVR staff (83%), and OVR provides accessible and easy to use communication options to consumers (83%).

Over half of the respondents were employed (51.9%) at the time of the survey and most felt that their technology needs were currently being met (78%). The most commonly identified current or future service needs of respondents included job placement (62.3%), independent living skills (55.8%), resume and interviewing skills (53.9%), vocational evaluation (50%), and paid work experience (45.5%).

D. Community Rehabilitation Provider (CRP) Survey

The OVR CRP survey recorded 99% of the target completion goal and had a total of 94 respondents from Community Rehabilitation Providers (CRPs) across the Commonwealth. CRP respondents were primarily female (66%) and all 19 KY OVR regions were served by the respondent CRPs. Louisville was the most represented region with 32.5% of respondents indicating they provided services in the greater Louisville area. A majority of CRP respondents (61.4%) receive 25 or fewer referrals and send 25 or fewer referrals to OVR annually. In terms of the Concerns Report issues that were generated from the CRP focus group, each of the 19 items were rated as important by the respondents (avg importance rating of 94.7%). The final Concerns Report concluded that 100% of the items were viewed as strengths or moderate strengths by CRP respondents. The top three highest rate strengths were as follows: OVR values and emphasizes partnerships with CRPs (90% satisfaction rating), OVR counselors demonstrate compassion and flexibility when working with Kentuckians with disabilities (88% satisfaction rating), and OVR provides necessary services to all categories of consumers including those with the most significant disabilities (83% satisfaction rating).

A majority of CRP respondents indicated that their technology needs had been met (88%) and that they had what they needed to meet virtually with consumers (96%). Seventy-two percent of CRPs reported they were able to respond to referrals within a week and 69.3% said they currently have no waiting list for services. The top five barriers to providing services to OVR consumers identified by respondents included: lack of long-term support funding (38.7), lack of available qualified and/or trained staff (34.6%), low KY-OVR fee for service rates (33.3%), lack of available financial resources (29.3%), and increases in consumers with multiple disabilities (26.6%).

E. Kentucky Career Center (KCC) Survey

The Kentucky Career Center (KCC) Survey achieved 100% of the target completions and had 12 total respondents representing their respective Kentucky Career Centers. Survey respondents were primarily female (78%) and represented seven unique regions across the Commonwealth (Cumberlands, Green River, KentuckianaWorks, Lincoln Trail, Northern KY, South Central, and Tenco). All but one respondent (89%) indicated that individuals with disabilities were able to fully access and participate in their available services. The most identified training needs for KCC staff were Social Security Work Incentives, Deaf and Hard of Hearing Support, Intellectual/Learning Disability Support, and Blindness and Low Vision Support. A majority of respondents (80%) reported having a good or excellent working relationship with OVR, and relatedly indicated that it was easy to refer someone to OVR services (80%) and that the process was seamless and high quality (80%). Generally speaking, KCC representatives indicated a high level of knowledge related to disability and accessibility-related topics, however, 40% of representatives reported a "poor" level of knowledge related to providing materials in alternate or accessible formats.

2023 Consumer Satisfaction Survey (CSS)

As part of federal requirements, OVR has collaborated with the Statewide Council for Vocational Rehabilitation (SCVR), the state's SRC, and the University of Kentucky Human Development Institute (HDI) since 1996 to coordinate the annual OVR Consumer Satisfaction Survey (CSS). The most recent survey was for cases closed between October 2021– September 2022. The CSS was presented to the SCVR at the quarterly meeting on April 24, 2023.

The sample of people randomly selected to participate was stratified to reflect the population of all consumers with cases closed in fiscal year 2022. IQS Research contacted consumers by email and/or telephone in January through March of 2023 to participate in the survey. A total of 1,042 individuals participated in the survey which was available as both a telephone and online survey, with responses included from each of the districts. Phone surveys accounted for 38.1% of responses and 61.8% of responses were collected via online surveys. The overall response rate for the survey was 23.8%. There was a 46% response rate via phone contacts and 18% via email contacts. HDI compiled the results, and the final report was reviewed by the SCVR Consumer Services and Program Evaluation Committee prior to HDI presenting to the entire council during the April 2023 quarterly meeting.

A total of 1,042 individuals participated in the survey with responses received from each of the 19 field districts. The overall statewide consumer satisfaction was 88.8% with an average score of 3.49 on a four-point scale (1 = very poor, 2 = poor, 3 = good, and 4 = very good)

Highlights from the report include the following:

1. Regardless of case closure status, respondents indicated that overall services provided by the Office were good or very good (88.8%).

2. The overall rating is highest for those individuals who closed Successful in Competitive integrated employment (96.6%).
3. More than three fourths (76.6%) of respondents whose cases were closed successfully felt that OVR helped prepare them for their current job.
4. 92.4% of consumers said they would return to OVR in the future.
    a. 93% of consumers who were employed indicated they are satisfied with the kind of work they do.
    b. 86.6% reported being satisfied with the salary they receive.
    c. 85.5% reported overall satisfaction with the quality of services as good to very good.

OVR Strategic Planning

In conjunction with the Statewide Council for Vocational Rehabilitation (SCVR), OVR utilized the strategic planning process to implement a four-year plan of action for the agency. The OVR Strategic Plan developed includes the goals, objectives and strategies for the agency and provides measures for determining the effectiveness in accomplishing its goals. The process was used as a part of the triennial Comprehensive Statewide Needs Assessment (CSNA). Information gained from this process was used to inform the State Plan.

The planning process was implemented in two planning sessions across a three-day period with the Executive Leadership Team (ELT), Regional Branch Managers and Cabinet staff, including the SCVR Liaison and Fiscal Team members. The strategic planning sessions began at 1PM on Tuesday, September 26, 2023, and ended at 12PM on Thursday, September 28, 2023.

During the first planning session on Tuesday, the ELT and staff met to analyze the agencies current goals and objectives to determine the progress of those goals and others that should carry forward in the new plan. In addition, the ELT reviewed the results of an agency-wide survey that was distributed to staff in late August of 2023. The survey results expressed the needs and concerns of staff and identified areas of improvement needed for staff to be more efficient in service delivery. The ELT focused on identifying those areas that presented an opportunity to implement within the next plan year and those areas that would become part of the final four-year strategic plan.

On Wednesday, UA Currents staff led by Robin Freeman joined the staff and conducted team building interactive activities that focused on building work relationships for the overall mission and vision of the agency. UA Currents Staff surveyed and engaged staff in team-building exercises to address the changing dynamics since the COVID-19 pandemic. The exercises were interactive, and staff were placed in rotating categories and on multiple teams to learn more about one another, their perspectives and their personalities related to work. One of the main purposes of the activities was to assist in efforts such as the strategic planning process to build trust, confidence and good working relationships amongst both seasoned and developing staff to accomplish agency goals as the OVR expands.

During the final planning session on Thursday, the team continued to work on the Strategic Plan for the agency. The six areas of focus identified on the October 1, 2021, through September 30, 2024, strategic plan was: (1) Sound Fiscal Management, (2) Quality Assurance, (3) Staff Resources, (4) Center Operations, (5) Consumer Services and (6) Public Awareness. The ELT determined that multiple areas of focus from the last plan were still relevant and are currently being implemented or planned. Therefore, the six areas of focus will remain in the new OVR strategic plan and in the same priority listed to complete. However, some revisions, additions and removals were made to the objectives within the areas of focus to reflect the identified needs of the agency, which are also laid out in Sections C and D of this state plan. The following new goals are:

1. Implement sound fiscal management that aligns with federal and state regulations for accurate and consistent reporting and operations.

2. Compliance with federal and state regulations in all areas to ensure continuous improvement and quality outcomes for consumers.

3. Maximize technology and business processes to effectively support accessibility and the evolving needs of all stakeholders.

4. Improve facilities and expand programs to increase competitive, integrated employment outcomes.

5. Implement innovative practices to improve quality outcomes.

6. Implement an ongoing, flexible outreach plan and process to improve public awareness of VR programs, services, and agency employment.

7. Changes were made to the goals for title VI, Part B Funds in keeping with the identified need for provider capacity for the community rehabilitation programs. There is one goal with multiple objectives and strategies.

- Goal 1: Build capacity within supported employment services for individuals with the most significant disabilities.

OVR State Plan Forums

In accordance with Section 101 of the Rehabilitation Act of 1973, as amended, the OVR held public meetings 2024 and 2025, to obtain public input and comment regarding the delivery of services to persons with disabilities prior to the implementation of the state plan.

Information regarding the forums were announced to the public through multiple venues, such as the websites for the Education and Labor Cabinet (ELC), OVR and SCVR. Announcements were made during the SCVR meetings prior to the event, and an informational document was distributed agency wide, through social media and to the Council for sharing. All forum materials and accompanying documents, including the modification to the existing state plan, were created in an accessible format and available on the OVR website. An announcement video-log was created to ensure individuals who

are deaf and hard of hearing were aware of the forum activities, and Interpreters were present at each forum for participation

SCVR advised OVR in the planning of the forums and participated in several, providing input and comments. OVR held the following hybrid options to provide all Kentuckians with access and an opportunity to comment on the dates, times and/or locations below:

- Louisville (in-person and virtual options): February 13, 2025, 10 – 11 a.m. EST, Charles W. McDowell Center for the Blind, 8412 Westport Road, Louisville.
- Louisville (in-person and virtual options): February 13, 2025, 6:30 – 7:30 p.m. EST, Charles W. McDowell Center for the Blind, 8412 Westport Road, Louisville
- Thelma (in-person and virtual options): February 18, 2025, 6:30 – 7:30 p.m. EST, Carl D. Perkins Vocational Training Center, 5659 Main St., Thelma.
- Virtual Public Forum, February 20, 2025, 1 – 2 p.m. EST.
- Virtual Public Forum, April 14, 2025, 10 – 10:30 a.m. EST.
- Virtual Public Forum, April 14, 2025, 6 – 6:30 p.m. EST
- Virtual Public Forum: June 3, 2025, 10 – 11 a.m. EST.
- Virtual Public Forum: June 3, 6:00 – 7:00 p.m. EST.

Common themes identified during the forum discussions surrounding Order of Selection and the Priority Category Definitions. Below is a summary of the discussions.

Order of Selection (OOS)

The public asked specifically how much time was spent studying the impact that OOS would have on individuals with disabilities and they wanted to know what cost saving measures OVR had put in place prior to the decision to implement OOS. Providers wanted OVR to clarify the effects OOS would have on their individual agencies. Many questions were asked about how the implementation of order of selection would affect individuals with an existing plan of services. The public was very concerned regarding the timeframe of implementation for OOS and how it would affect Supported Employment programs. Providers specifically asked if authorizations for services would still occur for employment and retention and career profiles and what specific populations would OOS affect. There were comments regarding how OOS would impact employer relationships and consideration should be given to the economic growth in Kentucky and the need for workers and how OOS will impact the providers ability to fulfill those needs.

Priority Categories Definitions

The public had specific questions regarding what category a certain diagnosis or disability of a person such as substance abuse or blindness would be assigned. There was input regarding all the work that OVR had done on the priority category definitions, and the public was appreciative of all the opportunities for input. One of the Community Rehabilitation Providers asked how this would impact how OVR established requirement for closing the record of services who have achieved an employment outcome and how we determine stability. There were several questions regarding priority category assignment, clarification of what the counselor role is in the process and how the wait list would be maintained after the implementation of OOS. Several individuals had input regarding having three categories versus four categories, how long this process will take and did OVR have a timeframe for implementation. OVR was encouraged to look at other states priority category definitions.

Other Input from the Public

The public had a lot of questions regarding functional limitations, what are they and how does the OVR Counselor through the eligibility process functional limitations are determined. Providers raised questions about how the rate study was conducted and the associated costs and they requested a public view of how grant funds work. There were questions surrounding the Division of Program Policy and Support. There were concerns expressed regarding caseload sizes for the counseling staff and workflow issues.

Assistive Technology Branch

A high-tech driving system is one in which electronic gas, brakes, and/or steering are required to allow an individual to operate a motor vehicle safely and independently. Due to the lack of availability of the van, services were delayed for several months while waiting individuals had to wait for a van for training. OVR staff no longer must borrow a van from Superior Van and Mobility when a high-tech evaluation (or training) needs to be completed. OVR obtained their own Van and are now able to set up the vehicle and leave it set for the consumer until training is complete. It enables us to seamlessly switch for the next consumer. This is a more effective use of staff time and allows consumers who require new high-tech modifications to be served more quickly. This identified need has been met because in 2025 OVR secured an evaluation and training vehicle for consumers to be effectively evaluated and trained in order to obtain, and be ready for, competitive integrated employment.

Kentucky Business Enterprises

Kentucky Business Enterprises is one of the nation's vending and foodservice programs operated by individuals who are visually impaired or blind. The program trains and places individuals as self-employed operators of snack bars, dining facilities and automated vending facilities in public and private buildings across the state. The program provides full-time employment and career opportunities for Kentuckians who are legally blind while providing high-quality vending and food services for government and businesses.

The mission of KBE is to provide opportunity and independence to blind entrepreneurs across the Commonwealth. This mission will continue as we find our new normal after COVID, all while working

to replace opportunities, improving efficiencies, and maintaining and updating current locations. KBE's goal is to increase independence, fiscal prosperity, and the abilities of its blind vendors through technology and industry proven best practices.

As telework becomes the norm and more staff work from home, it reduces the opportunities for blind vendors in federal and state buildings that were once filled with staff daily. The continued telecommuting trend means modifications to KBE sites will continue to be necessary. This includes updating equipment, changing the service line from a snack shop to a micro market, utilizing self-ordering technology, and other possibilities which may not even be on the market yet. KBE must maintain a first mover advantage, to introduce up to date concepts to our locations around the state. The food service industry has been quick to embrace rapidly changing technology, with the intention of reducing costs and/or decreasing labor. This creates a unique challenge for KBE as we look at fiscal planning for the future of the program. Much of the technology we will be purchasing in a year or two may be only in the development stage right now. This is why industry training and education is essential for blind vendors and KBE staff.

The future of vending, as we have known it, is uncertain and ever changing. KBE will need funding to embrace new technology as it comes on the market. This new tech is still expensive, with time needed to train and implement, thus the need for strong funding is needed to support this revolutionary change. KBE must be revolutionary rather than evolutionary to provide a world class product to our vendors and our customers. We will look to industry groups (Kentucky Restaurant Association, National Restaurant Association, National Automated Merchandisers Association) consumer groups (National Association of Blind Merchants, Randolph Shepard Vendors of America, Kentucky Committee of Blind Vendors), and other stakeholders (General Services Administration, Department of Defense, Kentucky Finance Cabinet) to identify the future technology which will provide new or greater independence to blind vendors, and superior service to the locations we serve.

Ongoing education and training will be essential for Kentucky's vendor population and agency staff, in the future, this includes new vendor training. As always, traditional industry trainings are important, and training on emerging technology will be vital. In addition to technology, vendors need education and training in all areas from customer service and food safety to business practices. These trainings may be provided by agency staff, or be industry and specialty led. These training opportunities may be, but are not limited to, national industry events that require travel and the associated costs, including the cost of accessible, independent travel for the blind vendors. Vendor participation in industry events increases active participation from the vendors in the assessment of needs and the purchasing process for new equipment.

With dwindling sales due to building staff permanently telecommuting, many vendors will no longer be able to make a sustainable wage at their current locations. There will be an increased need for KBE to provide additional opportunities by obtaining new sites for blind vendors, while maintaining the current locations. As history has shown, KBE will not willingly be awarded locations that are lucrative for others. In many cases, this involves legal battles with federal and state entities to defend the Randolph-

Sheppard priority against those who do not recognize it, or the comparable state law. Legal options should always be a last resort, but in most cases, have proven to be both necessary, and quite costly. These legal expenses are often prolonged over time and can necessitate a long-term financial outlay by the agency. KBE will always provide the location and vendor with the most current and advanced assets that meet all stakeholders needs.

OVR obtained a modified box truck in 2025, a critical to update operational equipment to service our vendors needs in a safe and efficient manner. The truck is equipped with a high weight liftgate, the ability to secure items while in route, and the capacity for moving large amounts of equipment at one time. The lift gate is necessary as KBE moves equipment statewide and many locations do not have loading docks or receiving areas. Our vendors and locations depend on us to keep their machines working so they can serve their customers and maximize their earnings. OVR added a full-time administrative assistant in 2025 and has an established coordinator position that specializes in micro markets, a fast-growing trend in vending. KBE's needs are ever changing as is the business world in which we operate.

Kentucky RETAIN

Kentucky Retain is a U.S. Department of Labor grant focused on assisting individuals who have a non-work-related injury or illness continue to work. The Education and Labor Cabinet, Vocational Rehabilitation and other workforce partners administer the grant. Through immediate customized intervention and supports, KY RETAIN helps employers keep valuable staff and helps employees keep their worker identity. All enrolled participants in RETAIN have support of a Return-to-Work Coordinator. This is a strategy OVR utilizes for individuals in work re-entry. OVR staff refer individuals to RETAIN and RETAIN staff refer individuals to OVR. There have been 1,478 individuals referred by OVR Counselors through RETAIN and RETAIN has referred 131 individuals to OVR. For those completing the program there is a 92% success rate of return to work. Most individuals return to their pre-injury/illness job with the same employer. The program design is built around a rapid-rapid response disciplinary, and person-centered return-to-work/stay at work strategies that will result in higher rates of continued employment and lower rates of application for long-term Federal disability benefits. Return to Work Coordinators provide early intervention services aimed at getting employees back to work or to stay at work while navigating needed services. There will continue to be a strong emphasis on assistive technology, universal design and peer support. Currently the target population is workers with non-work-related injuries and illnesses that have not applied for or are receiving federal disability benefits in keeping with the research design of the grant. The grant ended in May of 2025. OVR is committed to continuing the work of RETAIN sustaining key initiatives and promising practices to meet the needs of employers and workers in the prevention of job loss.

Case Management System

Kentucky continues to use a VR case management system that is approximately 24 years old. The system processes are cumbersome, time consuming and plagued with technical problems. System

modifications take time, which mean we can focus only on the critical additions and changes with little time for effective process improvements.

OVR released an RFP in FY 2021 and through a competitive bid process chose a vendor. OVR is now in the process of design and development. The project is delayed and behind schedule due to change orders in place to assure the required functions for customization are met as stated in the contract. At this time, we anticipate a Go-Live date in mid-year 2026.

RSA Monitoring, Data Reports and the Corrective Action Plan

OVR was last monitored through an offsite monitoring with the Rehabilitation Services Administration (RSA) during the period of July 16, 2021, through August 20, 2021. OVR received their final monitoring report on January 22, 2022. After a thorough review of the recommendations, findings and corrective actions, OVR utilized the information in formulating a plan of corrective action to address the issues identified by RSA regarding the Vocational Rehabilitation and Supported Employment Programs.

OVR had ten findings in the following areas for Performance: 1) Insufficient Internal Controls for Management of the Federal Award; and 2) Non-Compliant and Outdated State Education Agreement. OVR had findings in the following areas for Financial Management: 1) Missing/Insufficient Internal Controls and Financial Management Deficiencies The ten findings have been resolved. OVR received confirmation from the Rehabilitation Services Administration (RSA) that the Corrective Action Plan (CAP) has been successfully completed and no further action by OVR is necessary on November 14, 2024.

OVR has had a Corrective Action Plan for Pre-Employment Transition Services in place since 6/21/24 that was issued regarding Noncompliance with Pre-Employment Transition Services. There was one finding: 1) Rehabilitation Services Administration's (RSA) annual review and finding regarding the State's failure to satisfy requirements governing the provision of pre-employment transition services in Federal fiscal year (FFY) 2021, as determined by RSA in accordance with Section 107(a) of the Rehabilitation Act of 1973 (Rehabilitation Act). There were two corrective actions associated with the findings and OVR has resolved corrective action #1. OVR has submitted the final quarterly report to resolve the plan in January 2026. OVR has worked collaboratively with the National Technical Assistance Center to identify the root cause and the development of a work plan to identify necessary internal control processes to ensure compliance moving forward.

Throughout the year, RSA has conducted quarterly performance data reviews that has assisted OVR in identifying areas of concern from the RSA data dashboards. This allows for comprehensive discussions and RSA provided technical assistance during the sessions.

B. INDIVIDUALS WITH DISABILITIES WHO ARE MINORITIES AND INDIVIDUALS WITH DISABILITIES WHO HAVE BEEN UNSERVED OR UNDERSERVED BY THE VR PROGRAM;

Summary of Findings

The 2024 Comprehensive Statewide Needs Assessment (CSNA) identified several key needs of individuals who have been unserved and underserved by vocational rehabilitation (VR) services in Kentucky. The assessment emphasized the importance of understanding the unique barriers and challenges faced by marginalized groups to develop tailored, strategic solutions.

Key Identified Needs

1. *Awareness and Outreach*:
    a. Unserved and underserved populations often lack awareness of available VR services due to insufficient targeted outreach and communication.
    b. Improved outreach strategies, particularly for rural communities and minority underserved and unserved groups, are necessary to increase program visibility.
2. *Access and Geographic Barriers*:
    a. Geographic location is a significant barrier to accessing VR services, particularly in rural areas where transportation is limited.
    b. Increased accessibility to VR offices and services is essential, requiring mobile or virtual services and partnerships with local organizations.
3. *Employment Opportunities and Training*:
    a. Marginalized groups, including racial and ethnic minorities, women, and those in rural areas, have higher unemployment rates and require more accessible job training and placement services.
    b. The assessment highlighted a need for more inclusive training programs, apprenticeships, and partnerships with local employers to create meaningful job opportunities.
4. *Tailored Support Services*:
    a. Culturally competent and language-specific support services are crucial for underserved groups to navigate VR programs effectively.
    b. Support services should address specific challenges faced by marginalized populations, such as discrimination or complex family situations.
5. *Coordination and Partnerships*:
    a. Improved coordination between VR and community organizations, advocacy groups, and employers is needed to address barriers effectively.
    b. Building stronger networks and partnerships can help reach unserved individuals and improve service delivery.
6. *Inclusive Program Design*:

a. Program development should include the input of unserved and underserved populations to create tailored strategies that address their needs directly.

7. *Awareness of Barriers*:

    a. Awareness among service providers and policymakers of the systemic barriers affecting unserved and underserved individuals is essential for effective policy and program design.

Individuals with disabilities, particularly those with mental illness, criminal backgrounds, out-of-school youth, and sensory impairments like blindness or deafness, had lower rates of VR utilization and demonstrated poorer outcomes. The CSNA specifically identified disparities in employment rates, income levels, and service outcomes across various demographic groups. Black and African American consumers, for instance, entered VR services with lower employment rates and higher rates of SSI/SSDI benefits receipt compared to their White counterparts, resulting in substantial earnings gaps. Hispanic and Latino/a consumers also faced challenges in accessing VR services, exhibiting lower employment rates and income self-reliance upon entry to the program. Despite improvements observed in income and employment outcomes for successful cases, disparities persisted, indicating a continued need for targeted support. Transition-age youth comprised a significant portion of VR cases, yet many exited services before an Individualized Plan for Employment (IPE) could be established. Successful case outcomes demonstrated notable increases in income and employment, underscoring the importance of early intervention and support for this demographic. Rural and Appalachian communities encountered unique challenges due to geographic isolation, leading to barriers in accessing VR services. Findings from interviews and surveys conducted during the CSNA underscored the need for targeted outreach and improved public awareness strategies to effectively reach and serve these marginalized populations.

OVR Selected Consumer Populations for FFY 2021-23: Minorities and Unserved/Underserved

Female Consumers

Over the three-year review period, OVR closed 13,426 cases for consumers who identified as female, comprising 45.8% of the total population of consumers served. The average age of the OVR female consumers was 39.5 years (SD=17) and an examination of the age distribution of female consumers revealed that nearly one-third of the female consumers were in the transition-age group (32.1%), followed closely by md-career (28.1%), early career (23.4%), late career (12.2%), and female consumers over age 70 (4.2%).

In terms of racial and ethnic identities, female consumers were primarily White (80%), followed by Black or African American women (10.3%), Hispanic or Latina (8.2%), Asian (0.5%), Hawaiian or Pacific Islander (0.2%), Native American or Alaskan Native (0.2%), and those who identified with two or more races (0.6%). Female OVR consumers had proportionally more representation than their male counterparts in the Black or African American category (+0.6%), among those who identified as Asian (+0.3%), and finally in the Hawaiian and Pacific Islander population (+0.1%). Meanwhile, women were more underrepresented than men in the Hispanic or Latino/a category (-1%).

Just over half of OVR's female consumers resided in Kentucky's metropolitan areas (52.4%) and well over one-third (37.2%) were living in the Appalachian region of the stare. Compared to males, females were about as likely to live in metropolitan counties (+0.2%) but were more likely to reside in Appalachia (+2.3%).

In terms of employment and income, at the time of application 41.5% of OVR female consumers reported being engaged in competitive integrated employment, 38.1% were primarily reliant on their own income sources, and 20.9% reported receipt of SSI/SSDI benefits. This means that female consumers entered OVR services with higher employment rates (+3.3%), higher levels of income self-reliance (+2.2%), and lower rates of SSI/SSDI benefits receipt (-2.2%) than OVR male consumers in the same time frame.

Early Exit Rate

Just under one in three OVR female consumers exited services before an IPE could be established (30.8%). This is a lower rate than the 37.3% of male consumers who exited before the IPE. The top three given reasons for cases closed before IPE among female consumers were “all other reasons” (48.6%), no longer interested in services (26.3%), and unable to contact or locate (19.2%).

Outcomes

Among OVR female cases that made it past the IPE stage into services, a case success rate of 55.1% was observed. This was slightly lower (-0.9%) relative to their male counterparts. On average, females had slightly lower overall case expenditures (Female: $6,014; Male: $6,285) and spent more time in services (Female: 890 days; Male: 803 days). This demonstrates an overall disparity in the breadth and timeliness of services delivered to female consumers, which may explain help explain the slightly lower-case success rates.

For successful cases, female OVR consumers saw an increase of 30.5% in income self-reliance rate and a 0.9% decrease in SSI/SSDI benefits receipt rate from the time of application to case closure. For reference, male consumers reported a 29.8% increase in income self-reliance, and a 1.2% decrease in SSI/SSDI benefit receipt rate. In terms of income, female consumers, on average, reported increases in wages (from $13.49 at application to $19.92 at closure) and hours worked (from 22 hours per week to 33.6 hours per week), resulting in an average annual income gain of $19,371 (from $15,433 per year to $34,804 per year). A slightly greater annual increase than male consumers who added an average of $18,965 in income.

Black and African American Consumers

Over the three-year period, OVR closed 2,427 cases for consumers who identified as only Black or African American, comprising 10% of the total population of consumers served. The average age of the OVR Black/African American consumers was 40.5 years (SD = 15.6) and an examination of age distribution revealed that the most frequently served age group among Black/African American consumers was those in the mid-career age bracket (34.2%), followed by early career (26.3%),

transition-age (24.5%), late-career (12.8%), and over age 70 (2.2%). Just over half (50.3%) of Black/African American consumers identified as male. More than three-quarters of OVR's Black/African American consumers resided in Kentucky's metropolitan areas (79.6%). Conversely, only 7.1% of Black/African American consumers were living in the Appalachian region of the state.

In terms of employment and income, at the time of application 24.6% of Black/African American consumers reported being engaged in competitive integrated employment, 21.1% were primarily reliant on their own income sources, and 39.2% reported receipt of SSI/SSDI benefits. This means that Black/African American consumers entered OVR services with substantially lower employment rates (-17.2%), lower levels of income self-reliance (-18%), and higher rates of SSI/SSDI benefits receipt (+19.1%) compared to their White counterparts over the same time period.

Early Exit Rate

Just under one in three Black/African American consumers exited services before an IPE could be established (30.2%). This is a much higher rate of exit (+11.6%) compared to the 18.6% of White consumers who exited before the IPE. The top three given reasons for cases closed before IPE among Black/African American consumers were no longer interested in services (34.7%), unable to contact or locate (27.7%), and "all other reasons" (26.8%).

Outcomes

An analysis of cases that reached the IPE stage revealed that Black/African American cases were closed successfully at a rate of 36%. This was substantially lower (-21.7%) relative to their White counterparts. On average, Black/African American had slightly higher overall case expenditures (Black: $6,485; White: $6,236) and spent slightly less time in services (Black: 839 days; White: 874 days).

For successful cases, Black/African American consumers saw an increase of 44.3% in income self-reliance rate and a 3.5% decrease in SSI/SSDI benefits receipt rate from the time of application to case closure. For reference, White consumers reported a 29.4% increase in income self-reliance, and a 0.9% decrease in SSI/SSDI benefit receipt rate. While Black/African American consumers had lower rates of successful cases, the cases that did close successfully demonstrated far greater shifts in positive outcomes. In terms of income, Black/African American consumers, on average, reported increases in wages (from $6.61 at application to $15.33 at closure) and hours worked (from 12.5 hours per week to 29.7 hours per week), resulting in an average annual income gain of $19.379 (from $4,297 per year to $23,676 per year). A lower annual increase than White consumers who added an average of $21.684 in income.

The discrepancy becomes much more concerning when comparing the final reported annual incomes of successful Black/African American consumers ($23,676 per year) to White consumers ($41,063), revealing a $17,387 earnings gap between successful Black/African American consumers and their White counterparts.

Hispanic and Latino/a Consumers

Over the three-year review period, OVR closed 2,144 cases for consumers who identified as Hispanic or Latino/a (of any race), comprising 8.8% of the total population of consumers served. The average age of the OVR Hispanic/Latino consumers was 39.5 years (SD = 17.1) and an examination of age distribution revealed that the most frequently served age group among Hispanic/Latino consumers was those in the transition age range (31%), followed by mid-career (29.6%), early career (23.5%), late-career (11.7%), and over age 70 (4.3%). More than half (54.7%) of Hispanic/Latino OVR consumers identified as male. A majority (55%) of Hispanic/Latino consumers resided in Kentucky's rural counties, however, just under half (46.6%) of Hispanic/Latino consumers dwelled in the state's Appalachian region.

In terms of employment and income, at the time of application 40.4% of Hispanic/Latino consumers reported being engaged in competitive integrated employment, 37.8% were primarily reliant on their own income sources, and 18.5% reported receipt of SSI/SSDI benefits. Overall, Hispanic/Latino consumers entered OVR services with slightly lower employment rates (-1.4%), lower levels of income self-reliance (-1.3%), and lower rates of SSI/SSDI benefits receipt (-1.6%) compared to their White counterparts over the same time period.

Early Exit Rate

Just over one in three Hispanic/Latino consumers exited services before an IPE could be established (34.1%). This is a much higher rate of exit (+15.5%) compared to the 18.6% of White consumers who exited before the IPE. The top three given reasons for cases closed before IPE among Hispanic/Latino consumers were "all other reasons" (30.5%), no longer interested in services (29.9%), and unable to contact or locate (29.5%).

Outcomes

An analysis of cases that reached the IPE stage revealed that Hispanic/Latino cases were closed successfully at a rate of 56.7%. This was slightly behind that of their White counterparts (-1.0%). On average, Hispanic/Latino consumers had substantially lower overall case expenditures (Hispanic/Latino: $4,690; White: $6,236) and spent far less time in services (Hispanic/Latino: 507 days; White: 874 days).

For successful cases, Hispanic/Latino consumers saw an increase of 25% in income self-reliance rate and a 0.8% decrease in SSI/SSDI benefits receipt rate from the time of application to case closure. For reference, White consumers reported a very similar 29.4% increase in income self-reliance, and a 0.9% decrease in SSI/SSDI benefit receipt rate. In terms of income, Hispanic/Latino consumers, on average, reported increases in wages (from $16.01 at application to $20.88 at closure) and hours worked (from 25.5 hours per week to 35.3 hours per week), resulting in an average annual income gain of $17,098 (from $21,229 per year to $38,327 per year). A lower annual increase than White consumers who added an average of $21,684 in income (making $41,063 per year).

Transition Age Youth

Over the three-year review period, OVR closed 13,087 cases for consumers who were transition age (aged 15-25), comprising over one-third (34%) of the total population of consumers served. The average

age of the OVR transition age consumers was 21.9 years (SD = 1.9) and a majority (60.7%) identified as male.

In terms of racial and ethnic identities, transition age consumers were primarily White (77.6%), followed by Hispanic or Latino/a (10.9%), Black or African American (9.7%), Asian (0.6%), Native American or Alaskan Native (0.1%), Hawaiian or Pacific Islander (0.1%), and those who identified with two or more races (1.0%). Just over half of OVR's transition age consumers resided in Kentucky's metropolitan areas (52.8%) and just over one in three (34.8%) were living in the Appalachian region of the state.

In terms of employment and income, at the time of application 14.7% of transition age consumers reported being engaged in competitive integrated employment, 7.8% were primarily reliant on their own income sources, and 18.4% reported receipt of SSI/SSDI benefits.

Early Exit Rate

About two-thirds of transition age consumers exited services before an IPE could be established (66.3%). Over half (54.4%) of OVR transition age consumers exited as potentially eligible after receiving pre-ETS services, serving as the primary cause for the exceptionally high pre-IPE closure rate in the group. The three most prevalent reasons given for case closure were "all other reasons" (57%), no longer interested in services (24.1%), and unable to contact or locate (17.3%).

Outcomes

Among transition age cases that made it past the IPE stage into services, about over one-third (33.4%) of cases resulted in a successful closure. On average, $7,627 was spent on each transition age case and the typical duration of services was approximately 923 days. For successful cases, a staggering 72.6% increase in income self-reliance was observed among transition age consumers as well as a 0.5% decrease in SSI/SSDI benefits receipt rate from the time of application to case closure. In terms of income, transition age consumers reported increases in wages (from $2.04 at application to $13.98 at closure) and hours worked (from 4.4 hours per week to 29.9 hours per week), resulting in an average annual income gain of $21,269 (from $467 per year to $21,736 per year).

Rural Consumers

Over the three-year review period, OVR closed 17,500 cases for consumers residing across Kentucky's 85 rural counties, comprising 45.6% of all OVR consumers.

Appalachian Consumers

Over the three-year review period, OVR closed 13,049 cases for consumers residing across the Commonwealth's 54 Appalachian counties, comprising just over one-third (33.9%) of all OVR cases.

Demographic Profile of Working-Age Consumers

The overall demographic profile of the consumers working age (18-64) served by OVR from FFY 21-23 was examined.

A direct comparison of racial and ethnic identities of OVR consumers to the racial/ethnic breakdown of Kentuckians with disabilities revealed that OVR served a higher proportion of consumers who identified as Black of African American (OVR: 10%; KY: 7.33%), Hispanic or Latino/a (OVR: 8.8%; KY: 2.36%), Native American or Alaskan Native (OVR: 0.2%; KY: 0.15%), and Hawaiian or Pacific Islander (OVR: 0.1%; KY: 0%). The only minority population group that OVR was not proportionately, or better serving was consumers who identified as Asians (OVR: 0.3%; KY: 0.6%). The overall data suggests that OVR is excelling in their efforts to provide services to marginalized population groups, particularly Kentuckians who identified as Hispanic or Latino/a. The low proportional service rate for Kentuckians of Asian extraction is of particular note given the documented rise in discrimination against Americans of Asian descent in the wake of the COVID-19 pandemic.

Underserved communities, especially communities of color, experience higher rates of violent crime, especially hate crimes and gun violence, which have devastating effects on victims, their families, and their communities. In addition, some communities still experience disparities that strain progress in areas such as health, education, housing and employment. 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.

https://data.census.gov/table/ACSST1Y2022.S1810?g=010XX00US

https://data.census.gov/table/ACSST1Y2022.S1810?g=040XX00US21

Kentucky's Older Population and Vision Loss

OVR contracted with *VisionServe Alliance* (2022). Kentucky's Older Population and Vision Loss: A Briefing, St. Louis. of Kentucky's Older Population with Vision Loss to identify the growing need for this underserved/unserved community.

Executive Summary

This briefing is designed to assist policy makers and service providers to better understand the characteristics and circumstances of older people with vision impairment in Kentucky. Data from the Behavioral Risk Factor Surveillance System and the Census provide considerable insight into the population of people experiencing vision loss. Almost 10% of older Kentuckians report severe vision impairment, with men (9.5%) and women (9.8%) reporting about the same prevalence of vision impairment, but women with vision impairment comprise 56% of the older population. African Americans report a higher prevalence of vision impairment than whites. Vision impairment is not evenly distributed across the state. The prevalence of vision impairment among people aged 65 years and older by county ranges from about 3.3% to 23.5%.

Older people with vision impairment have lower levels of education and are poorer than older people without vision loss. Thirty-one percent of older people with vision impairment have not graduated from high school, and 32% have annual incomes below $20,000. In addition, older people with vision impairment report higher prevalence of chronic conditions, particularly stroke, arthritis, diabetes, kidney disease, and depression. Not surprisingly, then, 48% of older people with vision impairment in Kentucky compared to 27% among older people without vision impairment report fair or poor health. Moreover, 41% of older people with vision impairment report 14 or more days of poor physical health in the past 30 days compared to 17% of those without vision impairment. Similarly, 14% of people with vision impairment report 14 or more days of poor mental health compared to 7% of those without vision loss. This disparity in quality of life is repeated in activity limitation days, where 30% of people with vision impairment report 14 or more days of activity limitation compared to 20% among those without vision impairment. Upstream factors including poverty and lower education have the potential to contribute to higher prevalence of chronic conditions and poorer health-related quality of life. These factors may lead to increased disability, including increased difficulty walking, dressing/bathing, and doing errands.

Data from state and national surveys provide quantitative information regarding health, chronic conditions, and quality of life factors associated with vision impairment in Kentucky. These data, when informed by the personal experiences of people who have lost vision, serve to define policy decisions and interventions to preserve the independence, dignity, and autonomy of older people with vision impairment. By aligning aging services, public health initiatives, transportation resources, and vision rehabilitation programs to meet the needs of older people with vision impairment, there is potential to improve health, quality of life, and function.

Purpose

This briefing provides estimates of the prevalence of vision impairment among older people in the state of Kentucky at the state and county level. Using state and national data systems, this report describes self-reported health, prevalence of chronic conditions, and quality of life among older people with and without vision impairment. The findings show that an estimated 9.7% of older people in the state report vision impairment, and they report substantial health and social disparities compared to older people without vision impairment, differences that potentially compromise function and quality of life. By better understanding the circumstances of older people with vision impairment in Kentucky, policy makers and providers can tailor services in aging, public health, transportation, and vision rehabilitation to preserve the dignity, independence, and quality of life of older people.

Introduction

Vision impairment and blindness often have profound effects upon older people and those who care for and about them. Vision impairment can make common activities difficult or impossible; for example, climbing stairs, crossing a street, driving, using public transportation, preparing meals, and performing household activities may be compromised. Older people experiencing vision impairment may have difficulty managing accounts, paying bills, and identifying prescribed medications. Falls or fear of falling may further compromise their independence. Vision impairment is often isolating, keeping

people at home when they prefer to be with family and friends. Many older people with vision loss do not interact with others who are going through the same experience, creating further isolation and depression.

An estimated 9.7% of older Kentuckians report vision impairment or blindness. Those most at risk for vision impairment are African Americans and older age groups. Older people with vision impairment are more likely to report less education and to experience poverty. They are also more likely to have age-related chronic conditions compared to older people without vision impairment. As Kentucky's population continues to age, the number of people experiencing vision impairment will likely increase.

While the circumstances and risk factors associated with aging and vision loss are serious, much can be done to ameliorate the effects of vision impairment. For example, improved access and utilization of vision and eye health, as well as the availability of comprehensive vision rehabilitation service providers, promoting independence and autonomy, are effective strategies often enabling older people in Kentucky to live independently and remain in their community.

Social Determinates of Health and Health Equity

Health inequities are shown to be related to social determinants of health based on sex, socio-economic status, race, ethnicity, and specific health conditions. Overall, people with vision impairment, as this report demonstrates, are disadvantaged in multiple domains of poorer health, decreased quality of life, and increased disability.

One social determinant of health is defined by educational level which often predicts career and economic well-being. Among older people with vision impairment, 31% did not complete high school compared to 17% of people without vision impairment.

In addition, older people with vision impairment are much more likely to experience poverty and lower incomes than people without vision impairment. For example, 14% of older people with vision impairment report annual incomes of less than $10,000 compared to 6% of older people without vision impairment. Nine percent of older people with vision impairment report annual incomes between $10,000 and less than $15,000, compared to 7% of people without vision impairment. Ten percent of older people with vision impairment, compared to 8% of people without vision impairment, report an annual income of $15,000 to less than $20,000. Lower socio-economic status has also been shown to represent a substantial barrier to access to care for those with vision loss—those with the most need for care.

While people with or without vision impairment are likely to have health insurance and a regular doctor, more people with vision impairment report having to delay health care because of cost, 8% compared to 4% of people without vision impairment.

Geographic Distribution

Vision impairment is not evenly distributed across the United States or within states. The prevalence of vision impairment is shown among people aged 65 years and older among the 120 counties of Kentucky.

Five categories of prevalence are presented, ranging from about 3.3% to 23.5%. Higher prevalence of vision impairments tends to occur in more rural counties where resources and care providers may be scarce. Lyon County (23.5%), Owsley County (23.3%), Martin County (22.7%), Lee County (21.8), and Breathitt County (20.8%) report the highest prevalence of vision impairment among older people while Logan County (3.3%), Simpson County (3.4%), Spencer County (4.3%), Shelby County (4.4%), and Ohio County (4.5%) report the lowest prevalence.

Demographic Characteristics

An analysis of 2019 Behavioral Risk Factor Surveillance System data reveals that 9.7% of people 65 years of age and older report vision impairment in response to the question, "Are you blind or do you have serious difficulty seeing, even when wearing glasses?" While 9.8% of older women over age 65years report vision impairment, 9.5% of men do so. Women, however, comprise 56% of the older population of people with vision impairment. In Kentucky, vision impairment varies by race: 9.3% of whites report vision impairment compared to 12.1% among African Americans.

Vision Rehabilitation Program

A central component of support for older people with vision impairment is a network of public and private agencies providing vision rehabilitation services addressing communication, activities of daily living, personal care, self-advocacy, travel and mobility skills, diabetes, and medication management, as well as access to assistive technology (e.g., smart phones, tablets, and computers). Services often include counseling, information, and referrals to community resources and support. Vision rehabilitation services generally include low vision evaluations and the provision of adapted vision devices. Moreover, older people with vision impairment benefit from peer support groups where older people share common experiences and exchange information about successful management strategies. These services are often provided in the client's home or in an agency setting. The sum of vision rehabilitation services improves independence, self- esteem, health, and quality of life.

Despite the best effort of these agencies, only about 3% of older people with vision impairment nationally receive vision rehabilitation services (see healthypeople.gov here). This gap between need and response represents a major public health and public policy concern recently addressed by a National Academies of Science, Engineering, and Medicine (NASEM, formerly the Institute of Medicine) seminal report *Making Eye Health A Population Health Imperative: Vision for Tomorrow*. The NASEM report asserted, "Vision rehabilitation is essential to maximizing the independence, function, participation, safety, and overall QOL of people with chronic vision impairment. Yet there are numerous barriers to high quality and universally accessible vision rehabilitation services." A goal of Healthy People 2030 is to increase access to vision rehabilitation services by only 10%, to 3.3% over a ten-year period (see Healthy People 2030 here).

Discussion

The experience of vision impairment for older people is complex and multidimensional. This report estimates the population and distribution of older people with vision impairment in Kentucky, and it

characterizes the population in terms of health, chronic conditions, health-related quality of life, and disability status—variables available from the Behavioral Risk Factor Surveillance System and the American Community Survey. These findings reveal that upstream circumstances related to poverty and poorer education create the potential of downstream outcomes in poorer overall health and quality of life as well as increased disability.

While this briefing provides considerable insight into health, chronic conditions, and quality of life factors at the population level, the report does not tell the personal stories of older people who have lost vision. It does not chronicle the isolation or struggle to find eye care or vision rehabilitation service providers. It does not describe the positive effects of vision rehabilitation or the power that older people feel when participating with peers to share their stories or solve common problems. That gap will be filled by others.

Conclusion

About 9.7% of people aged 65 years and older respond yes to the question "Are you blind or do you have severe difficulty seeing even when wearing glasses." African Americans and people who are older, poorer, and less educated report higher prevalence of vision impairment. People who are older and visually impaired report higher prevalence of chronic conditions, poorer overall health, and poorer health- related quality of life.

These factors appear associated with higher prevalence of disability indicators. These findings reveal that people with vision impairment are disadvantaged in multiple ways that place them at greater risk for compromised independence and autonomy.

The findings in this report are designed to inform policy makers and providers about the circumstances of older people with vision impairment so that decisions and programs can be designed to better support older people with vision loss.

Foundational Purposes for KYOVR

The Big Data Project serves as a foundation for the following:

- Informing strategic planning;
- Driving policy development;
- Engaging state holders—aging, public health;
- Redefining outcomes: improved health and quality of life, O & M as example; and
- Other materials will fill gap between state data and human experience.

OVR Engagement and Advocacy Team

The OVR Engagement and Advocacy Team is made up of OVR staff. Their Vision Statement is that OVR will be the nation's exemplary VR agency and a model employer by leveraging advocacy and by

fostering meaningful engagement for Kentucky's workforce to deliver optima vocational rehabilitation services.

The goals of the team are as follows:

Staff Engagement and Advocacy: Recruit, hire and retain staff to provide high quality services to Kentuckians with disabilities.

Consumer Engagement and Advocacy: Ensure consistent and high-quality service provision to all Kentuckians with disabilities through outreach, training, and data analysis.

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 employment outcomes to individuals with the most significant disabilities who are underserved. Staff shall ensure that persons with the most significant disabilities will receive the same employment related services that all individuals with disabilities receive. OVR works to develop outreach activities to facilitate increased consumer referrals to the Agency. OVR encourages staff to get to know key community leaders and 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.

Staff participates in the Governor's LEAD Conference. Service demographic and population data is utilized to determine the number of underserved and unserved populations in regions and develop strategies to increase percentages. OVR will utilize different methods and channels of communication in targeting underserved and unserved 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.

All individuals 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 underserved and unserved populations.

The following outlines the actions in OVR's outreach plan:

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 increasing employment outcomes to individuals with the most significant disabilities.

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 that all individuals with disabilities receive.

Recruit and hire qualified Rehabilitation Counselors to improve system linkages with the Department of Workforce in order to reach more underserved and unserved populations 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 facilitate increased consumer referrals to OVR. OVR supports staff in making linkages with community leaders and organizations to facilitate outreach.

Encourage existing staff to play an active role in policy and program development, service delivery and program monitoring activities.

Utilize service demographic and population data to determine the number of underserved and unserved populations in regions and develop strategies to increase percentages.

Encourage underserved and unserved populations to play an active role in the State Rehabilitation Council, participating forums and the provision of input into policies and procedures.

C. INDIVIDUALS WITH DISABILITIES SERVED THROUGH OTHER COMPONENTS OF THE WORKFORCE DEVELOPMENT SYSTEM; AND

In Kentucky 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. 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.

OVR has five regional managers that are assigned as liaisons with the local workforce areas in their regions. As the liaison they work closely with the local managers and operators for their areas. They serve on the local workforce boards and their respective committees. The Regional Managers submit reports quarterly to the Field Services Director and the Executive Director summarizing activities and projects on the local area.

OVR collaborated with agencies across the Department of Workforce Development for state plan activities and to analyze Kentucky's workforce needs throughout the ten local workforce regions. The Kentucky Workforce Innovation Board (KWIB) created an Interagency Team to meet regularly to facilitate activities that promote collaborations between all Core Programs and the Cabinet. The OVR Executive Director, Deputy Executive Director, Vocational Rehabilitation Administrator and SCVR liaison, and Regional Program Managers within the Division of Field Services, participated in the Interagency Team activities. From June through October 2023, the OVR staff attended meetings, traveled across the local workforce development areas (LWA) and engaged in various listening sessions to learn the concerns, ideas and challenges of these local communities.

Insight was gathered from learning the public's perspective of the current Kentucky workforce system and how it might be seen as a valuable resource for the local communities. Some communities discussed

the need for more emphasis on on-the-job training programs for youth while in high school, community housing and the accommodations needed for the economic growth of the area, the difficulty in finding and keeping employees and the lack of broadband in rural areas. These concerns are often compounded for individuals with disabilities, which is discussed throughout the OVR state plan.

The collaborative efforts continued until the completion and final submission of the state plan.

Kentucky Career Center (KCC) Survey Summary

The Kentucky Career Center (KCC) Survey achieved 100% of the target completions and had 12 total respondents representing their respective Kentucky Career Centers. Survey respondents were primarily female (78%) and represented seven unique regions across the Commonwealth (Cumberlands, Green River, KentuckianaWorks, Lincoln Trail, Northern KY, South Central, and Tenco). All but one respondent (89%) indicated that individuals with disabilities were able to fully access and participate in their available services. The most identified training needs for KCC staff were Social Security Work Incentives, Deaf and Hard of Hearing Support, Intellectual/Learning Disability Support, and Blindness and Low Vision Support. A majority of respondents (80%) reported having a good or excellent working relationship with OVR and relatedly indicated that it was easy to refer someone to OVR services (80%) and that the process was seamless and high quality (80%). Generally speaking, KCC representatives indicated a high level of knowledge related to disability and accessibility-related topics, however, 40% of representatives reported a "poor" level of knowledge related to providing materials in alternate or accessible formats.

D. YOUTH WITH DISABILITIES, INCLUDING STUDENTS WITH DISABILITIES AND THEIR NEED FOR PRE-EMPLOYMENT TRANSITION SERVICES. 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 IDEA.

The Kentucky Office of Vocational Rehabilitation (OVR) continues to partner with the Kentucky Department of Education (KDE) through the National Technical Assistance Center on Transition (NTACT). OVR and KDE have representatives that co-lead a team dedicated to improving transition services to Kentucky students with disabilities. This team met bi-weekly throughout 2023 and received intensive technical assistance from NTACT. The team also sent a group to the NTACT Capacity Building Institute in Charlotte, NC to receive additional technical assistance and training.

To determine specific areas of need for students with disabilities, the team conducted focus groups with seven different school districts throughout the Commonwealth of Kentucky. Each of the five OVR regions was represented by these seven schools and care was taken to choose a diverse group of school districts, including both urban and rural districts. The intent of the focus groups was to determine the level of collaboration between each school district and the local OVR office assigned to serve those schools. Additionally, three focus groups were conducted with OVR staff assigned to local school districts. Although all focus groups have been completed, a data analysis is currently being conducted,

and a report of the findings is not yet available. However, a review of the transcripts from the focus groups reveal some common themes.

Many of the school districts that participated in the focus groups did not have a good understanding of the OVR process, including how and when to refer students to OVR. Some school staff stated that they did not know how to contact or had never met the OVR Counselor assigned to their school. This was more common among rural districts, where the OVR Counselor is responsible for multiple school districts. These Counselors are also responsible for providing services to adults with disabilities. Staff turnover, both OVR and school staff, was mentioned in multiple focus groups as a significant barrier to services. Many teachers and OVR Counselors in the focus groups were new to their roles.

Another common theme was an apparent lack of understanding of the continuum of VR services, including Pre-Employment Transition Services (Pre-ETS), Transition Services, and Employment-Related Services. Some school staff mentioned that they would try to refer students with IEPs to OVR late in their senior year, just before graduation. Others stated that they did not understand the difference between Pre-ETS and other OVR services.

It is our hope that students with disabilities in Kentucky will begin receiving Pre-Employment Transition Services as early as age 14. These Potentially Eligible students may receive Pre-ETS over a two-year period before they apply for OVR services. Early in the third year of secondary school, these students should apply for OVR services so they may begin working with a VR Counselor to determine an appropriate job goal. At his point, they will begin receiving transition services to help them achieve their job goal.

Through the strategic planning process with the Employment First Council, a focus group of students was held at the Carl D. Perkins Vocational Training Center in June of 2023. The main topic of the focus group was Transitioning from High School to Post-Secondary Education. There were six students that participated in the focus group facilitated by the Facilitation Center at Eastern Kentucky University. The following emerging themes shared from this group were for planning purposes: 1) addressing transportation; 2) Employers taking disabilities more seriously; 3) life skills and being able to live on your own; 4) Steady cash flow/income; and 5) understanding benefits. Another focus group of six OVR Vocational Rehabilitation Counselors and Pre-Employment Services Coordinators was held. This group focused on key issues and potential actions for the area of Transition Services. Emerging themes for consideration were: 1) Lack of coordination and cooperation in state agencies, provider to client, within providers; 2) Lack of education for a broad group; 3) Pre-employment transition services need to grow; 4) Transportation; and 5) Turnover and lack of staff and the impacts.

Youth/Transition Survey Summary

The OVR Youth/Transition Survey surpassed the number of target completions by 114% and received a total of 273 responses. Parents or guardians of consumers with disabilities comprised more than half of survey respondents (51.3%) and transition-aged consumers made up another 42.5% of the responses. Over half of Kentucky's 120 counties (65 in total) were represented by survey respondents. The most

commonly represented disabilities included autism (36.8%), behavioral/mood disorder (26.4%), and intellectual disability (21.5%).

In terms of the Concerns Report issues that were generated from the OVR Consumer/Public focus group, all 20 items were rated as important by the respondents (avg importance rating of 90.1%). The final Concerns Report concluded that 100% of the items were viewed as strengths or moderate strengths by OVR transition-aged consumers, with three-quarters of the items rated as strengths (having a satisfaction rating of 75% or higher). The items that garnered the highest satisfaction ratings included: OVR provides opportunities for consumers to give feedback and responds to their concerns (84%), Student preferences for job goals and assistive technology are prioritized by OVR staff (83%), and OVR provides accessible and easy to use communication options to consumers (83%).

Over half of the respondents were employed (51.9%) at the time of the survey and most felt that their technology needs were currently being met (78%). The most commonly identified current or future service needs of respondents included job placement (62.3%), independent living skills (55.8%), resume and interviewing skills (53.9%), vocational evaluation (50%), and paid work experience (45.5%).

2. IDENTIFY THE NEED TO ESTABLISH, DEVELOP, OR IMPROVE COMMUNITY REHABILITATION PROGRAMS WITHIN THE STATE.

Through the most recent Comprehensive Statewide Needs Assessment (CSNA), the University of Kentucky Human Development Evaluation (HDI) Team conducted a virtual focus group with Community Rehabilitation Provider (CRP) administrators and staff on 10/31/23 at 10:30 AM. This focus group resulted in the following themes and sub-themes.

1. Communication and Relationship Management

- Emphasis on open communication between OVR, counselors, and CRPs.
- Challenges with counselor and consumer communication.
- Lack of community understanding about OVR services.

2. Service Delivery and Support for Consumers

- Insufficient funding impacting service provision.
- Need for better vetting of consumers and clearer expectations.
- Challenges with transportation options and service availability

3. Challenges with Pre-Employment Transition Services (Pre-ETS)

- Issues with the rollout, sustainability, and accessibility of Pre-ETS.
- Desire to restore original services and funding levels.

4. Provider Support and Collaboration

- Calls for transparent and inclusive long-term planning.
- Desire for increased support, financial transparency, and involvement of CRPs.
- Advocacy for CRP needs, cultural shifts, and regular budget examination.

5. Training and Resources

- Need for more training and resources for counselors and CRPs.
- Calls for standardized training, quality-focused training for CRPs, and better tools/resources.

6. Process Efficiency and Timeliness

- Concerns about lengthy processes, authorization delays, and intake procedures.
- Desire for better systems and technology to streamline communication and processes.

7. Workforce Issues and Caseload Management

- Counselor overload and overwhelmed staff.
- Need for appropriate caseload numbers and additional staff training.

8. Flexibility and Adaptability

- Desire for a more flexible and adaptive approach to service delivery.
- Need for innovative solutions, advanced technology, and leveraging current workplace shortages.

The final assessment, gathered through the HDI survey for CRPs, was summarized to assess perspectives of services and needs for OVR. The OVR CRP survey recorded 99% of the target completion goal and had a total of 94 respondents from Community Rehabilitation Providers (CRPs) across the Commonwealth. CRP respondents were primarily female (66%) and all 19 KY OVR regions were served by the respondent CRPs. Louisville was the most represented region with 32.5% of respondents indicating they provided services in the greater Louisville area. A majority of CRP respondents (61.4%) receive 25 or fewer referrals and send 25 or fewer referrals to OVR annually.

In terms of the Concerns Report issues that were generated from the CRP focus group, each of the 19 items were rated as important by the respondents (avg importance rating of 94.7%). The final Concerns Report concluded that 100% of the items were viewed as strengths or moderate strengths by CRP respondents. The top three highest rate strengths were as follows: OVR values and emphasizes partnerships with CRPs (90% satisfaction rating), OVR counselors demonstrate compassion and flexibility when working with Kentuckians with disabilities (88% satisfaction rating), and OVR provides necessary services to all categories of consumers including those with the most significant disabilities (83% satisfaction rating).

A majority of CRP respondents indicated that their technology needs had been met (88%) and that they had what they needed to meet virtually with consumers (96%). Seventy-two percent of CRPs reported they were able to respond to referrals within a week and 69.3% said they currently have no waiting list for services. The top five barriers to providing services to OVR consumers identified by respondents included: lack of long-term support funding (38.7), lack of available qualified and/or trained staff (34.6%), low KY-OVR fee for service rates (33.3%), lack of available financial resources (29.3%), and increases in consumers with multiple disabilities (26.6%).

Kentucky Employment First Council Priorities

In 2025, the Kentucky Employment First Council had the following priorities:

Priority One: Identify state policies that create disincentives to employment of people with disabilities and develop recommendations to address and eliminate those disincentives.

Priority Two: Develop training and resources for families, self-advocates, public and private providers, and employers on the benefits of competitive integrated employment of workers with a disability.

Priority Three: Recommend the implementation of effective practices to increase employment opportunities for workers with a disability to public and private providers of employment assistance and employers.

Priority Four: Establish measurable goals to assess progress of efforts to increase the employment of workers with a disability within the general workforce.

In addition, the Kentucky Employment First Council continued the partnership with the Department of Labor's Office of Disability Employment Policy on the National Expansion of Employment Opportunities Network Initiative. This collaborative effort aimed to increase competitive integrated employment opportunities, including those with significant disabilities through Customized Employment, Benefits planning and provider capacity/support throughout the state.

OVR Statewide Field Counselor Survey

OVR 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-two percent (52%) stated that there are Community Rehabilitation Program (CRP) providers in their area that provide CSE. However, 62% also stated that it’s not readily available due to limited staff or oversized caseloads. Around 93% 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, 85% stated that there was a need. Over 46% stated that they have at least 4 or more consumers on their caseloads that could benefit from CSE. Over 17% state that they have at least 8 or more consumers that need this service. As a result, the OVR implemented 3 Establishment Project MOAs 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. The

primary purpose of this project is to expand the evidence-based model of customized employment throughout a four- year period. At this time the projects are finishing up the first year of planning. As existing MOAs approach expiration, consideration will be given to new MOA recipients for continued expansion of customized employment. OVR is also exploring the implementation of a customized employment fidelity scale. The OVR CRP Branch staff participates in supported and customized employment Community of Practice meetings, which includes ongoing discussions pertaining to the development and implementation of fidelity scales.

OVR's Establishment Projects for Individual Placement and Support (IPS)

A thorough review of existing and prospective agencies was conducted by OVR. OVR conducted several meetings with Department of Behavioral Health (DBH) staff throughout the state to obtain information of existing agencies that have longitudinally strong relationships with DBH, and that also exemplifies high quality service delivery. The purpose of such a selection process is to increase the likelihood of success among programs. This process aided in the identification of potentially new and existing providers that could be used in expanding Individual Placement and Support (IPS) to those in unserved or underserved areas, as well as provide an evidenced based model of IPS SE to individuals with intellectual disabilities. As a result, OVR implemented four (4) establishment projects for the expansion of IPS to single mothers with serious mental illness and/or substance use concerns. The primary purpose of this project is to expand the evidence-based model of IPS SE throughout a 4-year period to the greatest extent possible to individuals who do not have access to this type of service. Currently, the projects are in their final year ending in June 2026.

OVR State Owned and Operated Rehabilitation Centers

The Charles W. McDowell Center and the Carl D. Perkins Vocational Training Center are the State-owned and operated comprehensive rehabilitation centers in Kentucky. Both are community rehabilitation programs providing necessary vocational rehabilitation services to individuals with disabilities. The Centers provide supports, training, and resources to the most unserved and underserved populations in Kentucky to maximize their opportunities to obtain competitive integrated employment. The centers serve individuals, largely from rural areas of the state, with significant, complex or multiple disabilities such as sensory impairments, criminal justice backgrounds and mental illness.

In order to keep the Centers operational and ensure continuity of service provision, at times it is necessary for the State to repair or replace systems and equipment within the center, including, but not limited to electrical, plumbing and hot water, fire prevention, ventilation, sewage, etc., that go beyond ordinary repairs and maintenance. The State will submit requests for prior approval to RSA for related costs that exceed the capital expenditure threshold used by the State. Master Agreements are in place for scheduled routine maintenance and inspection of the facility.

The Charles W. McDowell Center

The Charles W. McDowell Center is a rehabilitation facility serving individuals from across the Commonwealth and is owned and operated by the Kentucky Office of Vocational Rehabilitation (OVR).

The facility provides office and meeting space for OVR Field Services Division Staff as well as dormitory and classroom space for the residential and training program for blind and visually impaired consumers.

The McDowell Center, located in Louisville, is the only facility in the state of Kentucky which provides blindness skills training to adults, making it a singular and particularly important resource for individuals who are blind and visually impaired wishing to adjust to their vision loss and pursue competitive integrated employment. The McDowell Center offers training in vocational preparation, personal adjustment services, independent living skills, orientation and mobility, Braille, assistive technology, academic remediation, career assessment, vocational planning, work adjustment and work experience.

OVR's East Jefferson District staff and the Central Blind District field staff (i.e., VR counseling staff, assistants, assistive technology staff, community rehabilitation branch staff) are housed in the building. This greatly increases the foot traffic of VR participants and other stakeholders in the building. In the last year, the Center had between 220 and 250 program applicants/consumers and other stakeholders travel through the lobby's front desk per month for scheduled appointments and meetings. The McDowell Center blindness skills training program receives referrals from across the state. The number of staff housed at the Center is around 65 when fully staffed. In the 2023 state fiscal year, 83 blind and visually impaired individuals, representing both day and residential students, received training services through the McDowell Center and 1,170 received services through the VR unit housed at the Center.

Master Agreements are in place for scheduled routine maintenance and inspection of the facility. On a monthly basis, elevator, water treatment and pest control inspections occur. The HVAC system is provided quarterly maintenance. Backflow testing is conducted annually.

Semi-annually, the kitchen equipment, grease traps and electrical systems for fire alarms are inspected and maintained. On an annual basis, maintenance and inspections of the sprinkler system and kitchen hood occur.

State facility staff performed an assessment of the facility needs in 2019 and 2020. In 2021, state facility staff engaged architecture and engineering consultants to provide further review of the building and mechanical systems. It was determined that the work should proceed in phases and prioritized to address most critical issues related to dormitory renovations in 2021 and 2022. This Phase I work is complete. In 2023, state facility staff engaged these consultants again to determine Phase II work.

The results are as follows:

1. Building Renovation - The interior Architectural and all Mechanical, Electrical and Plumbing Engineering Systems (MEP) must be evaluated for replacement based on current operating condition, equipment life expectancy, and energy usage. All systems should be evaluated to determine the most effective means of controlling building spaces to desired set points for humidity and temperature.

1. All Building automation systems (BAS) should be upgraded to current standards and must provide for remote access via internet, centralized served storage, and application software. User interface must allow access to logic programming, graphics, data logging, trend data, alarms, and self – diagnostics.
2. All building sanitary drain piping must be replaced due to systemic failure of current piping system materials. All proper engineering standards and Housing Building Construction (HBC) plumbing codes must be followed. Architectural renovation to allow improved and expanded ability to serve consumers should also be included in this process, including but not limited to lighting, tactile surfaces, training areas, safety, interior design improvements for visually impaired and ADA for mobility affected students.
3. Paint, flooring and signage throughout entire building
4. Sun shading awning over windows of south facing cafeteria to prevent extreme heat and glare into south facing cafeteria.
5. Cafeteria kitchen – due to the age of existing equipment combined with lack of use during the pandemic, anticipate updates and replacement to appliances such as the ice machine, water dispenser, salad bar, freezer and dishwasher.
6. Consumer Training Kitchens – Updates Needed: Renovate three consumer training kitchens to facilitate increasing the numbers of students who can receive training and improve workspace and layout to accommodate students using a wheelchair.
7. This project may require completion in two phases based on work scope, building occupancy and timing of work.

2. Dormitory Restroom Accessibility and Safety – The dormitory restrooms require renovations to address ventilation, flooring, safety grab bars, storage and fixtures. All restrooms require accessible "ADA" shower areas. Wheelchair users cannot navigate into the shower for safe transfer, and controls for the shower are located outside the shower. Water from the shower is not contained and is a safety concern. Updates Needed: Recess the concrete slab in order to lower the shower panel, which would prevent water from draining out into the main bathroom area. Renovation to showers would allow for transfer and access to controls.

3. Security Cameras – additional security cameras to be added to existing security system, for front entrance lobby, instructional hallways and building hallways. Intercom system at dormitory entrance in order for residential staff to converse with individuals at door.

4. Campus Grounds Accessibility Updates Needed: Complete last phase of paved access encircling facility allowing safe exit from all exit doors.

5. Orientation and Mobility paved quarter- mile to half-mile walking path behind building on existing acre for independent travel and exercise around the training campus.

6. Exterior Repairs – Updates Needed: Retention walls require repairs to add proper drainage system, replace dislodged and crumbling bricks, and add a protective cap to the top of the wall. The service dog outdoor enclosure needs to be replaced.

The Carl D. Perkins Vocational Training Center

The Carl D Perkins Vocational Training Center at Thelma, KY is a multidisciplinary comprehensive residential rehabilitation and vocational training facility opened in 1973. The Perkins Center's mission is to assist Kentuckians with disabilities achieve suitable employment, maximize independence, and gain self-respect through individualized comprehensive services.

The Perkins Center is the only comprehensive, post-acute residential rehabilitation facility within Kentucky and regularly provides services to rehabilitation consumers throughout the Commonwealth. OVR Counselors located throughout Kentucky make referrals to the Perkins Center for a variety of rehabilitation programs and services based on the needs of eligible persons. The five programs of operation that comprise most of the Center's operation and meet high standards for program quality are Vocational Evaluation, Job Readiness Training, Vocational Skills Training, Assisted Living/Physical Restoration/Outpatient Rehabilitation, and the Lifeskills Enhancement Program.

The Commission on Accreditation of Rehabilitation Facilities (CARF) accredits the Evaluation and Training Units of the Perkins Center. To maintain quality program services and retain CARF accreditation while adequately serving individuals with the most significant disabilities, the Perkins Center must have adequate technology, a sufficient number of staff, and be able to continue to make improvements to the facility, which allows consumers, including those with the most significant disabilities, to access the facility. The following needs were identified by facilities and maintenance personnel:

1. Renovate Assisted Living Unit Restrooms and Replace all PTAC's

The need was identified in the Assisted Living Unit of the building interior on July 8, 2020, when facilities maintenance staff conducted a thorough assessment of the building. Renovation is needed to increase capacity in the assisted living unit by making the restrooms accessible. Many of the existing restrooms, built in 1973, are not accessible and require the use of a common shower area within the Unit. The work needed includes selective demolition, removal and replacement of plumbing systems, replacement of existing light fixtures, concrete slab replacement, doors/frames/hardware replacement, interior finishes including tile work (walls, floors, and base), drywall, painting and restroom accessories. The Assisted Living Unit is joined structurally to the existing building and does not constitute a separate building and costs do not exceed the appraised value of the building. We currently have full capacity assigned to those 13 rooms and 12 consumers on the waiting list for vacancies as they are available. Completion of this project would increase room space to 14, allow consumers to use their own accessible restroom area, allowing the Perkins Center to meet consumer needs timely while increasing the numbers served due to our continuous waiting list for the Assistant Living Unit. The Perkins Center has 113 PTAC (Package Terminal Air Conditioner) units located in dorm rooms and offices. These units

are 17 years old or older and have become costly to repair, if repairing is possible. The HVAC industry recommends such units be replaced if such units are more than 10 years old and functioning properly becomes an issue.

2. Industrial Truck/Forklift Training Area

This program is designed to meet entry level workforce needs of any business that employs industrial truck/forklift operators. Perkins Center consumers enrolled in this program will have the opportunity to obtain a 3-year renewable OSHA approved Industrial Truck/Forklift Operator's license. Upon completion of this training, consumers typically go to work in a multitude of businesses including, but not limited to retail stores, manufacturing plants, warehouses, wholesalers, or distribution centers. The outdoor training area is a tennis court that was built more than 30 years ago and has an asphalt surface. The surface has deteriorated over time, allowing the program to only use about one half of the entire surface for training purposes, currently. The program's Industrial Trucks are stored in a building on campus and require them to be driven to the training area. This program has grown tremendously in recent years and the following numbers will further explain our need for this project:

2017: 20 consumers completed the program; 11 consumers received a license; and 2,834 units/hours of total services were provided.

2018: 27 consumers completed the program; 19 consumers received a license; and 4,635 units/hours of total services were provided.

2019: 28 consumers completed the program; 26 consumers received a license; and 6,024 unit/hours of total services were provided.

2020 and 2021: During the COVID-19 Pandemic, the Perkins Center experienced difficult years due to the restrictions on programs. However, the program continued to serve consumers with over 1500 hours of training were provided during 2021.

2022: 22 consumers completed the program; 22 consumers received a license; and 5,662 units/hours of total services were provided.

2023 (through September): 27 consumers completed the program; 27 consumers received a license; and 6,170 unit/hours of total services were provided.

By utilizing the old tennis court location to construct a 5000 sq. ft. steel engineered building, Perkins Center would provide storage and training area for the Forklift Operations Program. More specific, concrete building pad should be at least 10,000 sq. ft. to accommodate outdoor training area as well. Building would require minimum temperature control, supply air/ventilation system for exhaust from propane powered fork trucks. Building should be equipped with a minimum of one 10' roll up door and one 36" utility door for access. Lighting should be high bay LED style and be no lower than 12' above floor. One multi-use bathroom should be included in the design. Suitable electrical, plumbing and internet systems should be included in the design. Completion of this project will allow the Perkins

Center to train consumers timely, during all seasons and within an environment similar to the jobs available in this field.

3. Fire Panel System and HVAC BAS Software/Controls Renovation

A large part of our facility fire monitoring system continues to run on a decades old system that needs to be merged into one active panel. This upgrade would allow us to get all our monitoring points up to code and eliminate the myriad of problems along with inconveniences of the old panel. The Center HVAC system controls in the main building are obsolete and operating on a system that cannot be upgraded or repaired if there is any major repair required. A new system with remote access, server operable, provides user interface for both graphics and logic operation while being capable of trending and data storage is needed. The system will need to interface with all building systems in use and sized for future needs. The system should also be capable of interfacing with multiple energy meters for the purpose of monitoring and data storage. The obsolete BAS controls in the main building should be replaced with current version equipment. The new system must provide remote access, be server operable, provide for user interface for both graphics and logic operation, be capable of trending and point data storage. Any remote modules must be able to be downloaded from remote connection. In addition, it must be able to interface with all building systems presently in use and sized for future needs. The system must also be able to interface with multiple energy meters for the purpose of monitoring and data storage.

4. Site Access and Security

The Perkins Center presently has two driveways onto the property and 22 doors allowing access into the building. The current layout is difficult for security to monitor and poses a safety threat for staff and students. The property is contained on three sides by fencing but is open to the road in the front. To further complicate the situation, the security office and camera monitoring station is in the rear of the building with no easy access to the front of the property. A building will need to be constructed roadside for security staff to be housed. An automatic gate with key card and remote operation will also be necessary for both entrances. There are four doors that are identified for replacement due to being mechanically irreparable and structurally deteriorating due to age (outside Cosmetology training area, both doors entering into the playground area, and two exiting the gymnasium to the rear concrete basketball area). A walk-through metal detector will need to be placed at the main entry to the building. This will allow staff to identify any persons who may have concealed weapons or other devices that are not allowed on center property. The overall objective is to provide a secure and safe environment.

5. Site Drainage and Riverbank Erosion

The frontage property of the Perkins Center is lower than the main road and the buildings on the property. Drainage piping is there and has been for many years. The original drain leading to the rear of the property is compromised and causes water to pond in low lying areas of the site during wet weather. The original drain needs to be assessed to determine if all or part of it can be replaced/repaired to allow water to drain from the property. Mowing and caring for this part of the Perkins Center property is often

difficult and requires extra labor due to the condition of the ground. It also presents as a hazard to consumers on-site when there is standing water.

Erosion/Slippage Area: There is significant erosion of property near the Big Sandy River, which joins the property. The goal of this project is to stabilize the erosion/slippage area at rear of property boundary. This section of the property is bordered by the Levisa Fork of the Big Sandy River. As the rivers water level rises and falls, it has eroded approximately 100 feet of shoreline at the rear of the property. This has left drain lines exposed and is undermining the security fence. It is a safety concern for those using the adjacent soccer field. This will require an engineering study to determine project scope.

6. Plumbing -Building Drain Lines

Plumbing systems have been repaired and replaced as needed over the years. The manhole in our Courtyard area is central to the drain system of our kitchen and dormitory areas. An assessment of that drain to the sewer plant is needed along with those systems leading from the dormitory into it. Frequent repairs have been made to maintain the interior drain lines from inside the building, however these failures have steadily increased in recent years. A complete assessment of these plumbing/drain systems is needed to determine the extent of what needs repair/replacement.

7. Exterior Security Lighting

Areas around the main and perimeter buildings are adequate but should be updated to LED type to provide longer life and reduce energy costs. However, there are issues with site perimeter lighting that need to be addressed. This includes repair parking lot lighting and additional lighting installed around the perimeter of the property. This will require removal of asphalt to repair the underground line, or another method of lighting such as solar be established. The front perimeter of the property, adjacent to Main Street does not have any lighting, making it very dark the entire 950’ of frontage and 100’ onto the property. The other area of concern is along the adjacent street (Riverview Drive), and it spans an area of 450’ of property frontage by approximately 50’ onto Perkins Center property. Correcting these concerns would provide a much safer and secure environment for consumers and alleviate issues security staff encounter when monitoring those areas by video and in person.

8. Renovation/Replacement of Store Front Windows

The glass “store front style” windows surrounding the interior of the main building and half of the physical therapy area, leaks whenever it rains. Towels must be kept throughout the building to catch the water from those windows when there is precipitation. There is rust and corrosion present. It is unclear if new structure is needed or replacement glass and seals to resolve the issue. Most of the glass and structure is original to the building built in 1973. The interior glass measures 2,608 sq ft. and the physical therapy glass is 225 sq. ft. A complete assessment as to the extent of repairs, or replacement, of the glass is needed.

9. Resurface Gymnasium Flooring

The current gym surface (73’5’’ long x 39’5’’ wide) is badly worn and in need of repair. It is original to the construction of the gym. It will need installation of a layer of Tarkolay over existing floor, then a 5+2 pad and pour system, game lines painted, vinyl base along walls, and a vinyl reducer along doorways and openings.

10. The Perkins Center Front Entrance including Childcare Area

The main entrance to the Center needs a canopy constructed to allow those loading/unloading to safely do so without concern for snow, rain and other weather conditions that may occur. Also, a covered walkway should be constructed to the outside entry of the Childcare room. Often, consumers, family members and staff must load/unload vehicles packed with clothing, food items, electronics, and other items at our front entrance where there is no cover from the elements. Parents/caregivers of children that utilize our daycare are also subject to weather events and a covered walkway to their entry would be attached to the structure and main building. Using a wheelchair lift is also a task that often becomes difficult due to rain, snow, or adverse conditions where the pavement may become slick or hazardous. A canopy and covered walkway have also been identified as a need on our Accessibility Plan performed by an Occupational Therapist.

11. Perkin’s Center Hot Water Systems

Replacement of aging Hot Water Heaters throughout the facility are needed. The site currently operates its hot water supply by utilizing twenty separate hot water heating units, eleven of which are near specified end of life service for these types of units and are not performing at full capacity. A planned replacement schedule should be determined and implemented before a failure constitutes an emergency.

12. The Carl Perkins Center Rooftop HVAC Units

The facility operates heating and cooling for all areas except the student dormitory by means of RTU’s (rooftop HVAC units) located on the rooftops of various sections of the buildings. There are 23 individual units, 21 of which are 2001 or older manufacturers. These units are beyond the specified 15–20-year service life cycle and are expensive to operate and maintain. Many of the units are not performing at 100%. All units provide cooling utilizing R-22 freon which is now obsolete to manufacture. Several units are either non-operational or operating in a limited capacity, currently. Based on evaluations of all RTU units, a scope for replacement is being developed to provide a timeline and an accurate cost determination.

13. The Carl Perkins Center Facility Wastewater Treatment Plant

The facility is served by an onsite Wastewater Treatment Plant that was installed in 2004/2005. This plant has a capacity to process up to 25k gallons of wastewater per day. The primary tank structure typically has a lifespan of 25-30 years. The support structure and decking, piping, electrical controls, blowers, pumps, and other hardware have a service life of 10-15 years. Based on an assessment completed by the original manufacturer, it is recommended that these system components and hardware

be renovated, and suspect parts be replaced. The goal of this renovation would be to make the Plant viable for another 8-10 years before full replacement would be required.

14. The Carl Perkins Center Parking, Driveway, and Entry Areas

The facility has approximately 110,000 square feet of areas that need replacement of asphalt, parking stops, concrete curbs, and grading. The entry/exit area to Cosmetology training will require a 900 square feet concrete pad.

15. The Carl Perkins Center Therapy Pool

The facility has a therapy pool utilized by consumers participating in therapy services. The liner for the pool is approximately 15 years old and is beginning to show signs of aging. The pool is used a minimum of 30 hours per week for both physical therapy and wellness participants. The typical pool liner has a lifespan of 15–20 years.

16. The Carl Perkins Center Building Exterior

The facility is 50 years old with an exterior made of aluminum/metal. The exterior has only been painted one time in the past 28 years. Many areas of the structure are stained and show signs of weathering. Because the structure includes a five-story dormitory, there are areas unreachable by facility maintenance staff and requires special equipment to reach.

17. The Carl Perkins Center Custodial/Building Maintenance/Maintenance Equipment

There is more than 75,000 square feet of flooring that requires daily cleaning and maintenance. The Center currently has a ride-on floor scrubber that is approximately 15 years old. It has been repaired multiple times and will soon need to be replaced. This equipment is used by both the Center janitorial staff and as part of the Building/Maintenance Training program.

18. The Carl Perkins Center Carpeting

There is approximately 15,000 square feet of flooring that is currently covered in commercial grade carpeting. These areas include the cafeteria, common areas, training areas, and conference rooms. Several of these areas have carpeting that is more than 20 years old and that needs to be replaced.

19. The Carl Perkins Center Paging/Intercom/Clock System

Currently the Center has an intercom system that is more than 30 years old. The dormitory has more than 100 rooms in which the intercom system should operate for emergency notifications and announcements; however, approximately 20% of the intercoms are inoperable. Furthermore, the intercom system should work throughout the building. As with the dormitory, several of these devices no longer work or are inaudible for announcements and notifications.

20. Carl Perkins Center Portable Stage

The Carl Perkins Center has a portable stage that is more than 15 years old. It is used for graduations, celebrations, and events such as job placement activities or movie nights. This stage is nearing the end of its' lifespan. Multiple sections are repaired each time it is utilized, and some sections are to the point of not being repairable. The replacement of this portable stage will be a priority in the near future.

C. GOALS, PRIORITIES, AND STRATEGIES

Section 101(a)(15) and (23) of the Rehabilitation Act require VR agencies to describe the goals and priorities of the State in carrying out the VR and Supported Employment programs. The goals and priorities are based on (1) the most recent CSNA, including any updates; (2) the State's performance under the performance accountability measures of Section 116 of WIOA; and (3) other available information on the operation and effectiveness of the VR program, including any reports received from the SRC and findings and recommendations from monitoring activities conducted under Section 107 of the Rehabilitation Act. VR agencies must—

1. DESCRIBE HOW THE SRC AND THE VR AGENCY JOINTLY DEVELOPED AND AGREED TO THE GOALS AND PRIORITIES AND ANY REVISIONS; AND

The 2023 Comprehensive Statewide Needs Assessment (CSNA) was conducted in 2023 and completed in 2024 by the Office of Vocational Rehabilitation (OVR) with input and participation from the Statewide Council for Vocational Rehabilitation (SCVR). The OVR State Plan contains goals and strategies based on the needs identified through the CSNA and other assessments performed. The SCVR, for the Combined Agency, reviewed, gave input and approved the goals for this state plan. During the quarterly meetings, the Council was informed of progress on the corrective action plan and OVR's progress in meeting the goals of the plan. The Executive Director and Division Directors report out at every quarterly meeting on the metrics data for services, capital plans and progress on the strategic plan goals. The council was given the opportunity for input on the goals and priorities and was involved in the decision-making process of keeping in place the existing goals moving forward. The existing goals address the issues in the corrective action plan as well as issues presented throughout the current statewide needs assessment.

The 2023 CSNA informs the OVR strategic and state plan; 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 OVR worked collaboratively to assess the needs of individuals with disabilities.

2. IDENTIFY MEASURABLE GOALS AND PRIORITIES IN CARRYING OUT THE VR AND SUPPORTED EMPLOYMENT PROGRAMS AND THE BASIS FOR SELECTING THE GOALS AND PRIORITIES (E.G., CSNA, PERFORMANCE ACCOUNTABILITY MEASURES, SRC RECOMMENDATIONS, MONITORING, OTHER INFORMATION). AS REQUIRED IN SECTION 101(A)(15)(D), (18), AND (23), DESCRIBE UNDER EACH GOAL OR PRIORITY, THE STRATEGIES OR METHODS USED TO ACHIEVE THE GOAL OR PRIORITY, INCLUDING AS APPLICABLE, DESCRIPTION OF STRATEGIES OR METHODS THAT—

A. SUPPORT INNOVATION AND EXPANSION ACTIVITIES;

B. OVERCOME BARRIERS TO ACCESSING VR AND SUPPORTED EMPLOYMENT SERVICES;

C. 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, POST-SECONDARY EDUCATION, EMPLOYMENT, AND PRE-EMPLOYMENT TRANSITION SERVICES); AND

D. IMPROVE THE PERFORMANCE OF THE VR AND SUPPORTED EMPLOYMENT PROGRAMS IN ASSISTING INDIVIDUALS WITH DISABILITIES TO ACHIEVE QUALITY EMPLOYMENT OUTCOMES.

List and number each goal/priority, noting the basis, and under each goal/priority, list and number the strategies to achieve the goal/priority

Support innovation and expansion activities:

Office of Vocational Rehabilitation (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 (CSS); the Annual Report of the council; and the Comprehensive Statewide Needs Assessment (CSNA). Although the Statewide Independent Living Council (SILC) is now independent of the state and has established its own 501C (3) nonprofit, OVR will continue to provide annual funding in the amount of $65,000. Effective July 14, 2022, legislation was passed that appoints the Department of Workforce Development, Office of Vocational Rehabilitation as the administrator of the Employment First initiative as well as the Employment First Council through KRS 151B.212. OVR will be providing funding for the activities of the Employment First Council.

OVR is committed to continuing the work of KYRETAIN by sustaining key initiatives and promising practices to meet the needs of employers and workers in the prevention of job loss. The current grant under the Department of Labor, Office of Disability Employment, ended in May of 2025. OVR is currently engaged in sustainability planning to keep Kentuckians as valued, productive members of the labor force past the end date of the grant project. The program design is built around a rapid-response, interdisciplinary, and person-centered return-to-work/stay at work strategies that will result in higher rates of continued employment and lower rates of application for long-term Federal disability benefits. Return to Work Coordinators provide early intervention services aimed at getting employees back to work or to stay at work while navigating needed services. There will continue to be a strong emphasis on assistive technology, universal design and peer support. Currently the target population is workers with non-work-related injuries and illnesses that have not applied for or are receiving federal disability benefits in keeping with the research design of the grant. As funding allows, OVR proposes using a portion of VR funds to support innovative efforts, through *Stay at Work Kentucky*, aimed at systemwide improvement of Kentucky's workforce. We posit that these system-focused efforts, working in concert

with other statewide workforce efforts (including Kentucky's WIOA State Plan), will lead to more Kentuckians, including those with disabilities, entering, re-entering, and staying connected to the workforce. We propose that the innovative and systemwide improvements imagined through *Stay at Work Kentucky* hold more promise for sustained engagement in the workforce of all Kentuckians, including those with disabilities.

OVR will continue its funding of the OVR state owned and operated facilities and public community rehabilitation programs. OVR will continue its support of the Individualized Placement Supports (IPS) Project through its collaborative relationship with Behavioral Health and the Human Development Institute in support of Community Rehabilitation Providers. The IPS projects are an evidence-based supported employment program, based on eight principles, including Rapid Job Development, Competitive Employment, Systematic Job Development, Integrated Services, Benefits Planning, Zero Exclusion, Time-Unlimited Supports and Worker Preferences. The IPS Model of Supported Employment has proven to be a successful approach for individuals with Serious Mental Illness and Substance Use. OVR will continue to be a partner in the IPS International Learning Collaborative and will provide data that may be used throughout partnering efforts.

Overcome barriers to accessing VR and supported employment services:

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: a) Individuals with the most significant disabilities, including the need for supported employment services; and b) 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.

OVR 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 minority. 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.

OVR has an accessibility workgroup that focuses on ensuring all materials and electronic communications are accessible to VR participants. Information is provided to individuals participating in services in their preferred language. OVR is committed to assuring that all individuals with disabilities have equal access to participate in services using the provision of reasonable accommodations and assistive technology and other available auxiliary aids and services. In 2023, this workgroup developed an Accessible Information & Communication Technology policy and procedure

for the agency that is currently under review by the Executive Leadership Team. It is the agency's goal that this policy and procedure for accessibility will be fully implemented by 2024.

The OVR Executive Director and designee are members of the CSAVR LEAD Professional Network. This allows for OVR to participate in a national workgroup addressing disparities among underserved and unserved groups, specific to the field of vocational rehabilitation.

OVR Engagement and Advocacy Team

The OVR Engagement and Advocacy Team is made up of OVR staff. Their Vision Statement is that OVR will be the nation's exemplary VR agency and a model employer by leveraging advocacy and by fostering meaningful engagement for Kentucky's workforce to deliver optima vocational rehabilitation services.

The goals of the team are as follows:

Staff Engagement and Advocacy: Recruit, hire and retain staff to provide high quality services to Kentuckians with disabilities.

Consumer Engagement and Advocacy: Ensure consistent and high-quality service provision to all Kentuckians with disabilities through outreach, training, and data analysis.

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 employment outcomes for individuals with the most significant disabilities who are underserved. Staff shall ensure that persons with the most significant disabilities will receive the same employment related services that all individuals with disabilities receive. OVR works to develop outreach activities to facilitate increased consumer referrals to the Agency. OVR encourages staff to get to know key community leaders and 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.

With a commitment to the agency's mission, management and staff at OVR focus on competitive integrated employment in assigned tasks, planning and utilization of work time, initiative of self-directed work teams, and innovative projects. Expanding employment outcomes to minorities with the most significant disabilities is inclusive in the agency's commitment and principles. Staff shall ensure that persons with the most significant disabilities will receive the same employment related services that all individuals with disabilities receive. OVR works to develop outreach activities to facilitate increased consumer referrals to the Agency. Staff are encouraged to get to know key community leaders and community organizations to facilitate effective outreach. The Office follows Equal Employment Opportunity guidelines and Affirmative Action Procedures, and staff are encouraged to continue to participate in the Governor's LEAD conference. The Office encourages all staff to play an active role in policy and program development, service delivery and program monitoring activities.

Service demographic and population data is utilized to determine the number of underserved and unserved populations in regions and develop strategies to increase percentages. OVR will utilize different methods and channels of communication in targeting underserved and unserved 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.

OVR is committed in its effort to: a) ensuring individuals who are minorities have equal access to vocational rehabilitation services; and b) building the capacity to effectively service individuals who are minorities with the most significant disabilities.

The following outlines the actions in OVR's Outreach Plan:

- 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 increasing employment outcomes to individuals with the most significant disabilities from underserved and unserved populations.
- 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 underserved and unserved will receive the same employment related services that all individuals with disabilities receive.
- Recruit and hire qualified Rehabilitation Counselors from diverse groups. Improve system linkages with the Department of Workforce in order to reach more individuals 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 facilitate increased consumer referrals to OVR. OVR supports staff in making linkages with community leaders and organizations to facilitate outreach.
- Encourage existing staff to play an active role in policy and program development, service delivery and program monitoring activities.
- Utilize service demographic and population data to determine the number of underserved and unserved populations in regions and develop strategies to increase percentages.
- Encourage individuals from underserved and unserved populations to play an active role in the State Rehabilitation Council, participating forums and the provision of input into policies and procedures.

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, post-secondary education, employment, and pre-employment transition services):

In Kentucky there are 173 school districts consisting of 1,477 schools. There are more than 116,650 students (18%) 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, 107 Monitoring, the State's performance under the performance accountability measures of section 116 of WIOA and the Strategic Planning Process.

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.

OVR continues to receive technical support from the National Technical Assistance Center on Transition: The Collaborative (NTACT:C). A KY NTACT team has been formed to develop an Intensive Technical Assistance Plan to achieve goals related to data-sharing and quality transition services. This is a collaborative effort between KY OVR and KY Department of Education and with other community partners providing services to transition age youth.

OVR has an established Transition Services Branch to engage with and provide Pre-Employment Transition Services and Transition services to students with disabilities. The branch consists of one (1) Branch Manager, three (3) Program Administrators, one (1) Administrative Specialist, and six (6) Pre-ETS Coordinators. The Branch Manager oversees all branch activities and represents the agency on inter-agency teams. The Program Administrators coordinate and monitor Pre-ETS and Transition services throughout the state, including specific contracts with service providers. The Administrative Specialist provides clerical support to the branch. The Pre-ETS Coordinators work with Potentially Eligible students in their specific regions. They collaborate directly with schools and providers to receive referrals, coordinate Pre-Employment Transition Services, and monitor the progress of Potentially Eligible students to help determine if/when it is appropriate for a student to apply for OVR

services. The Pre-ETS Coordinators transfer the Potentially Eligible students' cases to VR Counselors who determine eligibility for services and develop Individualized Plans for Employment (IPE). Pre-ETS Coordinators do not determine eligibility or develop IPEs; they only work with Potentially Eligible Students.

The Transition Services Branch:

- Formulates, develops and interprets policies, standards and procedures.
- 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.
- Assists in the evaluation of the effectiveness of agency transition policies and procedures.
- Coordinates the activities of transition/Section 511.
- Coordinates the activities of Pre – Employment Transition Services.
- Facilitates the development and maintenance of agency fee schedules and cooperative agreements.
- Collaborates regularly with partners by participating in workforce partner meetings, community rehabilitation, OVR team meetings, vendors/contractors and Department of Education staff.
- Facilitates effective communication with the Executive Leadership, Field Services Management and field staff to assure the attainment of agency goals.
- Represents the agency by participation and representation on Transition Related events and Councils.

OVR receives technical assistance from the NTACT: C to ensure that OVR is meeting RSA requirements. Transition Services Branch staff participate in webinars and communities of practice to learn about different ways to deliver services and comply with the latest guidance from NTACT: C.

The Transition Services Branch continues to refine ways to do outreach to identify more students, to ensure that providers are following established guidelines, and to ensure students receive high quality transition services. Technical assistance will be sought from NTACT:C, as needed.

To assure the coordination of services to facilitate the transition students from school to postsecondary life (including the receipt of VR services, post-secondary education, competitive integrated employment, and Pre-Employment Transition Services), OVR utilizes the following process:

The Pre-ETS Coordinator and VR Counselor are responsible for the schools located in their assigned region. Pre-ETS Coordinators and VR Counselor work with school staff and service providers 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 Pre-ETS Coordinator and VR Counselor

work with school staff to ensure that student receives the needed services to aid in the transition to post-secondary life. The Pre-ETS Coordinators will work with Potentially Eligible students who only require Pre-ETS. These Coordinators will monitor students' progress and will transfer the students to a VR Counselor for application when they require other VR services. The VR Counselor will then take applications, determine eligibility, and determine appropriate services to help students achieve Competitive, Integrated Employment.

Services include but are not limited to:

- Pre-Employment Transition Services,
- Other VR services and programming offered by OVR, and
- Other services specific to transition aged students by school districts and other entities.

VR Counselors provide individualized services and where gaps in services are identified, staff work to developed new and innovative services in the students' home area to better serve this population.

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 Memorandum of Understanding with the KDE for transition planning and service delivery for secondary students with disabilities.

Improve the performance of the VR and Supported Employment programs in assisting individuals with disabilities to achieve quality employment outcomes:

Sound Fiscal Management

Goal 1: Implement sound fiscal management that aligns with federal and state regulations for accurate and consistent reporting and operations.

Objective 1-A: Develop internal controls that are embedded throughout service delivery.

Strategies 1-A:

- Conduct a risk analysis and identify needed procedures for internal controls.

- OVR staff works closely with Cabinet-level fiscal staff (budget, procurement, and accounting) in the development and implementation of written procedures that adhere to state and federal requirements.
- Develop needed policies and procedures.
- Train staff on established policies and procedures.

Measures 1-A:

- Completion of a risk analysis and a report is developed (June of 2025).
- Policy and procedural manual completion (September of 2024).
- Monthly meetings with Cabinet-level fiscal staff occur 75% of the time (9 meetings annually).
- 100% of staff are trained on established policies and procedures (December of 2025).

Objective 1-B: Best practices and effective policies are embedded in day-to-day operations.

Strategies 1-B:

- Dedicated staff are assigned to quality assurance monitoring over the internal control processes.
- Develop a quality assurance monitoring plan.
- Implement the quality assurance plan.
- Metrics are established for internal control processes.

Measures 1-B:

- 3 Program Grants Management Staff are assigned to quality assurance monitoring (September of 2024).
- Completion of the quality assurance plan (December of 2024).
- Metrics are established and included in the quality assurance plan (December of 2024).
- Quality Assurance Plan is implemented, and monitoring reports are submitted quarterly by the Grants Branch Manager (December of 2025).

Objective 1-C: Proper allocation and expenditure of funds.

Strategies 1-C:

- Conduct fiscal forecasting.
- Develop a plan for expenditure for the grant award.

Measures 1-C:

- Fiscal forecasting completed (September each year).
- Completion of expenditure plan (September of each year).
- Zero VR funds are reallocated annually (August of each year).
- OVR does not return any Pre-Employment Transition services annually (October annually).

Quality Assurance

Goal 2: Compliance with federal and state regulations in all areas to ensure continuous improvement and quality outcomes for consumers.

Objective 2-A: Enhance program compliance through the development and maintenance of policies and procedures.

Strategies 2-A:

- Identify an agency standard of accessibility.
- Develop a structure to maintain, update, and review policy and procedures.
- Train staff on the new process for policy and procedures.

Measure 2-A:

- Development and approval of an accessibility standard and manual (June of 2025).
- Complete a policy and procedure process for policy development and review (August of 2024).
- 100% of staff are trained (May of 2025).

Objective 2-B: Consistently analyze and use data to inform planning.

Strategies 2-B:

- Implement a consistent development and review process.
- Obtain input of leadership and management to identify outcome data needs.
- Hire staff to develop a strong data review process.
- Partner with internal and external stakeholders in education and workforce to obtain necessary data.

Measures 2-B:

- Identification of both internal and external data for programmatic and fiscal analysis completion (July 2024).

- Develop a contract with an outside source for data analysis and identification of trends (September 2024).
- Develop data sharing agreements with education and workforce partners (December 2025).
- Development of a plan for consistent development and review of data to inform day to day planning of service delivery is completed (July 2024).

Staff Resource

Goal 3: Maximize technology and business processes to effectively support accessibility and the evolving needs of all stakeholders.

Objective 3-A: All forms and documents meet accessibility standards.

Strategies 3-A:

- Ensure staff use accessible forms and documents.
- Staff responsible for creating forms will create forms that meet accessibility standards.
- Policies and procedures are in place for compliance.
- Train staff on accessibility and compliance.

Measure 3-A:

- All forms and documents meet established accessibility standards (December of 2024).
- Accessibility policies and procedures and the manual are completed (June of 2025).
- 100% of staff are trained on accessibility and compliance procedures (May of 2025).

Facility Operations

Goal 4: Improve facilities and expand programs to increase competitive, integrated employment outcomes.

Objective 4-A: Upgrade building facilities to provide a safe and accessible environment for all staff across the state.

Strategies 4-A:

- Develop a formal plan for ongoing and regular maintenance of state-owned buildings.
- Identify building locations private and state owned that present potential service, health, and safety risks for staff.
- Identify relocation needs.

- Follow and adhere to all state and federal processes.
- Implement approved projects in a timely manner.

Measure 4-A:

- A formal plan for ongoing and regular maintenance is completed for both the Carl D. Perkins and Charles W. McDowell facilities by December of 2024.
- A formal plan is developed with facilities for relocation of staff in field office locations with set timeframes by December of 2024.
- All facility projects are completed and operational as identified in the agency Capital Plan (annually).
- All facilities meet facility and safety requirements and pass annual inspections by the Cabinet Safety Officer (annually).
- 100% of projects have prior approval from RSA.
- 75% of approved projects are completed in a timely manner (annually).

Objective 4-B: Increase capacity to offer statewide services at state operated Centers.

Strategies 4-B:

- Expand curriculum and training opportunities in industry-standard computer software programs (e.g., computer literacy).
- Address hardware, software, and connectivity access barriers.
- Expand learning formats to include a variety of online and hybrid programs.
- Develop and implement a plan to ensure adequate resources for the learning format expansion.
- Centers will increase outreach efforts to reach consumers in all 120 counties.

Measures 4-B:

- Increase training enrollments by 25% for both Centers by 2024.
- Increase competitive, integrative employment by 25% for both Centers by 2024.

Objective 4-C: Maximize job readiness training and work experience opportunities.

Strategies 4-C:

- Expand job readiness training and work experience opportunities at the Centers.

Measures 4-C:

- 75% of McDowell Center VR participants complete a work experience (annually program year).
- Re-establish all the Perkins Center's current relationships and expand those by 25%.
- Completion of job readiness training at the Perkins Center will increase by 25% by 2024.

Consumer Services

Goal 5: Implement innovative practices to improve quality outcomes.

Objective 5-A: Increase the number of credentialed vendors.

Strategies 5-A:

- Incorporate vendor recruitment as a part of the outreach plan.
- Train staff on new vendor credentialing and processes for vetting.
- Recruit new vendors for increased consumer choice.
- Maintain a strong application/recruitment/retention vendor process.

Measure 5-A:

- All newly approved vendors are credentialed (July of 2024).
- Outreach Plan developed by (December of 2025).
- Increase supported employment providers by 5%. (July of 2025).
- 100% of staff are trained annually in May.

Objective 5-B: Consumers have access to industry-driven training, career, and other resources.

Strategies 5-B:

- Develop a list and expand the number of agency-approved vendors.
- Develop a plan for consumers to have access to technology and virtual services.
- Counselors place greater emphasis on providing informed choices.

Measure 5-B:

- Increase the number of consumers who are engaged in and complete training by 10% (June of 2025).
- 100% of Counselors are trained on informed choice (May of 2025).
- Completion of a plan for consumer access to technology and virtual services (December of 2024).

Objective 5-C: Strengthen existing workforce partnerships, develop new partnerships, and expand learning opportunities.

Strategies 5-C:

- Employer Services Branch will develop and implement a plan to partner with employers who offer jobs in targeted sectors.
- Increase work-based learning opportunities in targeted sectors.
- Train staff using career pathways strategy guides.

Measure 5-C:

- 10% increase in competitive, integrated employment outcomes in targeted sectors (July annually).
- 100% of staff are trained on career pathway strategy guides (May of 2025).

Objective 5-D: Counselors implement a career pathways approach to increase quality employment outcomes.

Strategies 5-D:

- Increase use of Labor Market Information in employment goal development.
- Increase consumer engagement.
- Implement policies that guide the implementation of the career pathway approach team-based, early intervention strategies.

Measure 5-D:

- Annual increases in the required federal common measures (annually July).
- Decrease cases closed "unable to contact/refused services" by 10% (June of 2025).
- 100% of staff receive training in "Engagement" and "Labor Market Information (May of 2025).
- Policies are developed on Career Exploration (September 2024).

Objective 5-E: Ongoing Systematic Training for all Staff.

Strategies 5-E:

- Formation of a Training Development Team.
- Develop a systematic training Schedule.
- Implement a systematic training schedule for all staff.

Measure 5-E:

- Training Plan Developed by December 2024.
- Ongoing systematic training is implemented by June 2025.

Objective 5-F: Increase service capacity and customer engagement through additional staff resources.

Strategies 5-F:

- Conduct an assessment of statewide staff needs based on a internal job duties analysis and service delivery trends.
- Develop a talent management plan.
- Recruit and hire staff to fill identified positions.

Measures 5-F:

- Assessment of statewide staff needs completed by June 2024.
- Talent Management plan completed by December 2024.
- Number of Positions Filled reducing the turnover rate from 16.67 % to 15% by June of 2025.

Public Awareness

Goal 6: Implement an ongoing, flexible outreach plan and process to improve public awareness of VR programs, services, and agency employment.

Objective 6-A: Implement a comprehensive outreach plan for the agency.

Strategies 6-A:

- Hire a dedicated outreach person.
- Create an outreach plan.
- Develop outreach materials to recruit vendors.
- Outreach materials that reflect current information and are engaging and in accessible formats.
- Outreach materials are made available to staff and consumers.

Measures 6-A:

- Staff hired to oversee outreach (July of 2025).
- Outreach plan completed by December 2025.
- All outreach materials are updated and maintained in appropriate, accessible formats (annually).

- Social Media presence maintained on most popular accessible sites (annually).
- All outreach materials will be located for easy access to staff and consumers (agency website/paper material to Perkins for distribution/Docushare Drive) (December 2024).

Objective 6-B: Recruit talent.

Strategies 6-B:

- Identify a staff representative to work with the Education and Labor Cabinet and Personnel Cabinet on issues related to talent recruitment.
- Identify staff representatives to make presentations to colleges, universities and technical colleges regarding OVR services and employment opportunities.
- Expand the quantity and types of internship programs with university programs.
- Leverage social media as a tool for recruitment.

Measures 6-B:

- Open positions are filled with qualified candidates at 90% or above (annually).

The Kentucky Office of Vocational Rehabilitation set the following goals for the distribution of Title VI, Part B Funds. Kentucky has set the following goals to assist with increase employment outcomes for adults and youth with a significant disability.

Goal 1: Build capacity within supported employment services for individuals with the most significant disabilities.

Objective 1.1: Increase the number of CRP's providing supported employment services.

Strategies: Recruit more IPS providers for supported employment by holding outreach opportunities for potential providers.

Strategies: Implement additional IPS Establishment Project contracts to continue expansion of the IPS model throughout KY.

Strategies: Recruit more Employment Specialists for participation in the University of Kentucky's Human Development Institute Leadership Series on Customized Employment.

Strategies: Implement additional Customized Employment Establishment Project contracts to continue expansion of Customized Employment throughout KY.

Strategies: Continue existing contract with the University of Kentucky to allow scholarship opportunities among Employment Specialists to participate in the Leadership Series training.

Strategies: Hire internal staff to serve as IPS Trainers and Fidelity Monitors

Strategies: Hire additional CRP Branch Consultant staff to increase recruitment of new CRPs.

Measure: Increase in the number of providers (10% annually).

Measure: Increase the number of certified employment specialist in customized employment (10% annually)

Objective 2:1: Reduce attrition among CRPs providing supported employment.

Strategies: Revamp supported employment payment structure.

Strategies: Develop and implement CRP Sustainability Survey.

Strategies: Research supported employment payment structures from other state VR agencies.

Strategies: Hire additional CRP Branch Consultant staff to strengthen CRP technical support.

Measure: Development, approval and implementation of new supported employment payment structure (September of 2024).

Objective 3.1: Improve monitoring and exploration of additional strategies to improve CRP service quality and compliance.

Strategies: CRP Branch staff will facilitate monthly meetings with CRP and VR staff to address quality and compliance issues.

Strategies: CRP Branch will regularly assess and amend the CRP Manual to ensure up to date and accurate information is readily available to CRP and VR staff.

Strategies: Train staff on new policies related to customized employment and person—centered planning.

Strategies: Provide quarterly CRP Branch Bulletin newsletter to CRP and VR staff.

Measure: Quarterly report (December of 2024)

Measure: Scorecard (December of 2024)

Objective 4.1: Seek alternative strategies for providing and funding Extended Services.

Strategies: Provide Extended Services support to youth with disabilities as outlined in CFR 361.5 (19).

Strategies: Gather input from staff, education partners, service providers, individuals with disabilities, their families, and other stakeholders.

Strategies: Explore state funding earmarked for Extended Services

Measure: Increased Partnerships with partnering state agencies of Behavioral Health (December of 2025).

Measure: MOU development (December of 2025)

D. EVALUATION AND REPORTS OF PROGRESS: VR AND SUPPORTED EMPLOYMENT GOALS

For the most recently completed program year, provide an evaluation and report of progress for the goals or priorities, including progress on the strategies under each goal or priority, applicable to that program year. Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require VR agencies to describe—

1. PROGRESS IN ACHIEVING THE GOALS AND PRIORITIES IDENTIFIED FOR THE VR AND SUPPORTED EMPLOYMENT PROGRAMS;

List the goals/priorities and discuss the progress or completion of each goal/priority and related strategies

Sound Fiscal Management

Goal 1: Implement sound fiscal management that aligns with federal and state regulations for accurate and consistent reporting and operations. (*Continuing into the next PY*)

Objective 1-A: Develop internal controls that are embedded throughout service delivery.

Strategies 1-A:

- Conduct a risk analysis and identify needed procedures for internal controls.
- OVR staff works closely with Cabinet-level fiscal staff (budget, procurement, and accounting) in the development and implementation of written procedures that adhere to state and federal requirements.
- Develop needed policies and procedures.
- Train staff on established policies and procedures.

Measures 1-A:

- Internal controls are implemented in day-to-day service delivery.

Progress:

OVR has met all the requirements and findings outlined it its Corrective Action Plan (CAP) and it was closed in November of 2024. OVR continues to provide fiscal training to staff that emphasizes that "fiscal responsibility is everybody's responsibility". Within the last six month's staff have received training on financial participation (cost sharing), comparable benefits and DRAAN (Documented, Delegable, Allowable, Allocable and Necessary). OVR Grants Management Staff work closely with Cabinet fiscal staff and OVR field staff in assuring that internal controls that are in place impact the day-to-day service delivery.

Objective 1-B: Best practices and effective policies are embedded in day-to-day operations.

Strategies 1-B:

- Dedicated staff are assigned to quality assurance monitoring over the internal control processes.
- Develop a quality assurance monitoring plan.
- Implement the quality assurance plan.
- Metrics are established for internal control processes.

Measures 1-B:

- Clean audit with no findings.
- Reduction of case review errors.
- Timely submission of reports with no errors.

Progress:

OVR had a state audit in January 2025 for state fiscal year 2024 and there were no findings. OVR has in place required policies and procedures. OVR submitted all reports in a timely manner but there have been reporting errors that required correction. The agency continues its work on the development and design of a new Case Management system with Geographic solution to ensure that accurate data is captured for reporting purposes. Staff continue to use manual processes in their procedures for additional checks and balances to assist with the accuracy of the information of reports, including measures for corrective action for identified errors. As stated, Additional staff resources have been dedicated to associated job duties to ensure compliance in all areas under the Program and Policy Support Branch (PPS). PPS Staff are provided with training on their individual position description procedures to assure they are implementing internal controls in the day-to-day service delivery. The Grants Management Staff are assigned to fiscal quality assurance monitoring over the internal control processes. The Quality Assurance team is responsible for the case review process.

f. Monthly meetings occur between OVR program and grant staff and Cabinet fiscal staff to discuss fiscal operations across divisions and programs.

Case reviews are intended to demonstrate the level at which policy standards are being followed together with a review process that provides a framework for increasing policy awareness. Prior to the review year, process improvements were implemented for isolating non-compliant case work, reviewer consistency, and data tracking. For 2025, case reviews were completed every month from January to October with additional reviews performed if compliance targets not met. A total of 1,417 initial reviews were completed within the 10-month time frame along with an additional 654 case reviews executed in response to a non-compliant scoring, bringing the total number of reviews to 2,071 for the year. Statewide scoring average for the year calculated as 92.2%, a decrease from 92.6% for 2024. Despite the

changes in scoring, it can be presumed that the minor percentage difference is a result of meaningful and consistent case work performed by field staff and supervision from leadership. Continued process improvements will be initiated for the 2026 review year with further focus on isolating non-compliance items and methods for strategy correction.

Objective 1-C: Proper allocation and expenditure of funds.

Strategies 1-C:

- Conduct fiscal forecasting.
- Develop a plan for expenditure for the grant award.

Measures 1-C:

- Fiscal forecasting completed.
- Adequate expenditure of funds

Progress: As already stated, OVR has developed and finalized several fiscal policies and procedures). OVR is participating in the Fiscal Forecasting Workgroup through the VRTAC QM. The VRTAC QM developed a Historical Review Template, A Tip Sheet for managing authorization attrition rates, and a "Framework for Fiscal Forecasting". OVR is utilizing these excellent tools for fiscal forecasting. Most recently, OVR conducted a historical analysis from the past four years tracking data by year for a comparison. OVR has based its plan on the three main categories of 1) Historical Data, 2) Current Data, and 3) Future Projections.

OVR contracted with the Public Consulting Group in July of 2024 to conduct a cost methodology rate study to develop methodology-driven comprehensive rates for the services through a review of services currently provided, research of industry standards, and an analysis of vendor costs. OVR has an implementation timeframe of January 2028 spanning over two years.

Quality Assurance

Goal 2: Compliance with federal and state regulations in all areas to ensure continuous improvement and quality outcomes for consumers. (*Continuing into the next PY*)

Objective 2-A: Enhance program compliance through the development and maintenance of policies and procedures.

Strategies 2-A:

- Identify an agency standard of accessibility.
- Develop a structure to maintain, update, and review policy and procedures.

- Train staff on the new process for policy and procedures.
- Train staff on common performance measures

Measure 2-A:

- Completion of a formal policy and procedure manual. (Not Met)
- Meets or exceed the RSA negotiated performance rates. (Not Met)

Progress: The accessibility workgroup developed an agency standard of accessibility, policy and procedural manual grounded in the Kentucky Accessible Information Technology Law (KRS 61.980 to 61.988), Section 508 of the Rehabilitation Act of 1973, and the Web content Accessibility Guidelines (WCAG) 2.1. The policy establishes guidelines for accessible information and communication technology (ICT), such as webpages documents, presentations, and forms. OVR has a full-time staff position that is dedicated to accessibility standards. They assure the accessibility of all documents, provide feedback to staff and guidance on accessibility and hold the agency accountable for assuring proper processes are followed.

OVR has written policies and procedures regarding the process for policy development and staff have been trained on those procedures. OVR continues its work on the development and implementation of a formal policy and procedure manual that is inclusive of administrative, financial, and programmatic sections. A lot of progress has been made in this area, but it is still a work in progress. OVR has competed editions to the Field Services policy manual. As stated in the last submission, staff performance evaluations contain expectations related to timely completions of Eligibility and IPE determinations and staff receive periodic training and guidance for this area.

Objective 2-B: Consistently analyze and use data to inform planning.

Strategies 2-B:

- Implement a consistent development and review process.
- Obtain input of leadership and management to identify outcome data needs.
- Hire staff to develop a strong data review process.
- Partner with internal and external stakeholders in education and workforce to obtain necessary data.

Measures 2-B:

Data is always used in the decision-making process.

Progress: OVR has implemented a consistent development and review process of both programmatic and fiscal data. Fiscal and programmatic data are reviewed monthly and analyzed on a quarterly basis. OVR utilizes the Case Management System as the authorized mechanism for staff to collect data

required for reporting and needed for the provision of services to consumers. Monthly Metrics Reports are generated from the Case Management system and disseminated statewide to all staff. This consists of three reports: 1) the current monthly metrics; 2) the current quarter metrics and 3) the calendar year to date program metrics. The metric reports contain statewide data as well as by district and by individual caseload for timeliness of services, time from referral to application, time from application to eligibility, time from eligibility to the development of the plan, Credential attainment, measurable skills gains, Employment Rate 2nd quarter after Exit, Employment Rate 4th quarter after exit, and median earnings. OVR began the development of a plan to identify outcome data needs. The OVR Director of Field Services meets with regional staff monthly and all managers quarterly and programmatic data is reviewed at those times. District Managers are expected to run ad hoc reports as needed to identify caseload service delivery trends.

OVR leadership utilized the RSA Data Dashboards quarterly to review programmatic data for the previous quarters of the RSA-911 data. OVR uses the dashboards in supporting quality assurance efforts for the RSA-911 reporting and fostering data-driven decision-making in the VR program. RSA also uses the data to assess the performance of the VR program through the calculation of evaluation standards and performance indicators as required by Section 106 of the Rehabilitation Act, which must be consistent with the common performance accountability measures established in Section 116 of Title I of WIOA for the core programs of the workforce development system.

OVR is currently working with the University of Kentucky Center for Excellence on a plan for data collection and analysis that can be incorporated into the Comprehensive Statewide Needs Assessment.

Staff Resource

Goal 3: Maximize technology and business processes to effectively support accessibility and the evolving needs of all stakeholders. (*Considered Complete*)

Objective 3-A: All forms and documents meet accessibility standards.

Strategies 3-A:

- Ensure staff use accessible forms and documents.
- Staff responsible for creating forms will create forms that meet accessibility standards.
- Policies and procedures are in place for compliance.
- Train staff on accessibility and compliance.

Measure 3-A:

- All forms and documents meet established accessibility standards.

Progress: The agency has in place an Accessibility Team, and an Accessibility Coordinator to assist with compliance and forward progress in policy and procedure as it relates to this goal. All documents,

forms and electronic communications are sent to the Accessibility Coordinator prior to dissemination and training in adherence to OVR policy and procedure. The agency Accessibility Coordinator works closely with staff to ensure that documents, forms and other correspondence meet accessibility requirements. In addition, the coordinator also assists with ensuring that documents sent out through larger Cabinet initiatives are also accessible for our staff. This has been accomplished through a solid working relationship with staff of the Education and Labor Cabinet (ELC) Office of Communications on accessibility. The ELC Office of Communications now has a staff person in place that serves as their accessibility specialist to assist them with internal assurances of compliance for all documents, forms and correspondence.

Facility Operations

Goal 4: Improve facilities and expand programs to increase competitive, integrated employment outcomes. (*Continuing into the next PY*)

Objective 4-A: Upgrade building facilities to provide a safe and accessible environment for all staff across the state.

Strategies 4-A:

- Develop a formal plan for ongoing and regular maintenance of state-owned buildings.
- Identify building locations private and state owned that present potential service, health.

and safety risks for staff.

- Identify relocation needs.
- Follow and adhere to all state and federal processes.
- Implement approved projects in a timely manner.

Measure 4-A:

- All facility projects are completed and operational as identified in the Capital Plan.
- All facilities meet facility and safety requirements.

Progress: The Carl D. Perkins Vocational Training Center (CDPVTC) and the Charles McDowell Center are both older state-owned residential facilities with complex maintenance issues that must be addressed. Both facilities have in place a formal plan for ongoing and regular maintenance. Both facilities have designated staff that are assigned the responsibilities outlined in the plan. The agency staff, along with executive leadership, meet bi-monthly and more if needed with the Education and Labor Cabinet (ELC) facilities staff to discuss the ongoing and regular maintenance issues as well as the capital projects. CDPVTC completed the medical wing updates in the Spring of 2025 that included the

remodeling of the accessible restroom. The McDowell center updated the HVAC controls to better regulate and monitor climate control throughout the building, and the front entrance doors were replaced with accessible sliding door. At this time, with the higher numbers of individuals receiving services and the increased cost of services there is not available funding for needed projects. Both facilities receive bi-annual safety inspections by the Education and Labor Cabinet Safety Administrator.

Objective 4-B: Increase capacity to offer statewide services at state operated Centers.

Strategies 4-B:

- Expand curriculum and training opportunities in industry-standard computer software programs (e.g., computer literacy).
- Address hardware, software, and connectivity access barriers.
- Expand learning formats to include a variety of online and hybrid programs.
- Develop and implement a plan to ensure adequate resources for the learning format expansion.
- Centers will increase outreach efforts to reach consumers in all 120 counties.

Measures 4-B:

- Increase training enrollments by 25% for both Centers by 2024.
- Increase competitive, integrative employment by 25% for both Centers by 2024.

Progress:

The CDPVTC offers Office Technology classes virtually and on-site for on-line computer skills training Microsoft Office programs. The cosmetology program at Perkins has recently expanded course offering for its participants. The food service program at Perkins experienced a significant expansion when the "barista" program was launch. Students who participate in the barista training gain skills in various coffee shop operations tasks. The logistics training program has added numerous skills and certifications and enhanced the CDPVTC curriculum offering "logistics associate, certified production technical and certified logistic technician. The CDPVTC on-line river's Permit Class has expanded to reach all areas of the State. The following numbers identify the growth of this program: 2022-35 participants; 2023 – 169 participants, and 2024 – 189. CDPVTC has addressed and resolved connectivity and wi-fi issues.

The McDowell Center offers in person and online training for industry-standard screen reader and magnification software programs for consumers with visual impairments preparing them for the workplace. Training is also provided at the McDowell Center for Navigation, Microsoft Office Suite, and Blackboard for students with a post-secondary degree as their goal. Staff and students have access to the most up to date version of JAWS/Fusion and wi-fi upgrades increases access across the building.

Digital Apex software training is utilized to allow students to continue training outside of their regular hours. This program allows students to become proficient in Microsoft Office Suite programs as well as Google Chrome.

Objective 4-C: Maximize job readiness training and work experience opportunities.

Strategies 4-C:

- Expand job readiness training and work experience opportunities at the Centers.

Measures 4-C:

- 75% of McDowell Center VR participants complete a work experience.
- Re-establish all the Perkins Center's current relationships and expand those by 25%.
- Completion of job readiness training at the Perkins Center will increase by 25% by 2024.

Progress:

The Perkins Center serves consumers from 80 of 120 counties. Monthly communications are disseminated to all local area Special Education Directors and OVR staff spotlighting program services. The Perkins Center has hosted 87 tours (both virtual and in-person) this year with 434 participants. Staff have participated in outreach events such as Transition Fairs, School hosted Career Fairs, etc., sharing information about the Center with more than 3,700 individuals throughout the state.

The McDowell Center leadership meets regularly with OVR managers and Rehabilitation Counselors for the Blind and provides a quarterly update that is sent statewide to all staff that highlights center updates. McDowell Center staff conduct outreach activities at community events and various conferences.

Training enrollments for the Perkins Center in 2024 was 153. The McDowell Center enrollment was 2024 was 71. For both centers the numbers have maintained at a steady rate.

• Increase competitive, integrative employment by 25% for both Centers by 2024. Competitive Integrated Employment Outcomes for the Perkins Center were as follows: 2022 – 46, 2023 – 38, 2024 – 46.

Consumer Services

Goal 5: Implement innovative practices to improve quality outcomes. (*Continuing into the next PY*)

Objective 5-A: Increase the number of credentialed vendors.

Strategies 5-A:

- Incorporate vendor recruitment as a part of the outreach plan.

- Train staff on new vendor credentialing and processes for vetting.
- Recruit new vendors for increased consumer choice.
- Maintain a strong application/recruitment/retention vendor process.

Measure 5-A:

- All newly approved vendors are credentialed.
- Increase supported employment providers by 5%.

Progress: The new case management system will contain a vendor portal that will allow for direct interaction with OVR grants management staff and will increase effectiveness and efficiency of operations.

There continues to be a significant need for providers in more rural areas of the state. During Program Year (PY) 2024, there were 1113 CRPs that were providing supported employment. This increase is more than the set goal of 5%.

Objective 5-B: Consumers have access to industry-driven training, career, and other resources.

Strategies 5-B:

- Develop a list and expand the number of agency-approved vendors.
- Develop a plan for consumers to have access to technology and virtual services.
- Counselors place greater emphasis on providing informed choices.

Measure 5-B:

- Increase the number of consumers who are engaged in and complete training by 10%.

Progress: All consumers have the option for virtual and in person appointments as a part of the VR process. OVR has expanded and implemented virtual instruction at both residential centers for the areas (i.e. driver permit instruction, blindness skills). All staff are trained on informed choice at hire. Intensive training the provides an increased emphasis on informed choice will occur in 2025 as a part of the training plan that will be completed in December 2024. All consumers have access to technology through the rehabilitation process. Counselors identify any technology needs consumers may have making appropriate referrals to OVR assistive technology staff. The Kentucky Office of Vocational Rehabilitation (OVR) is the lead agency for the KATS Network. The KATS Network in turn collaborates with five nonprofit organizations to operate assistive technology resource centers (ATRCs) across the state in Louisville, Lexington, Ft. Mitchell, Hazard, and Owensboro. These ATRCs provide assistive technology demonstrations, device loans, as well as accept device donations which they refurbish and redistribute to individuals in need. In addition to the ATRC collaborations, the KATS Network teams up with many other organizations to meet individual's unique needs as well as works to

connect Kentuckians to community resources. The KATS Network 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.

OVR houses the Assistive Technology Alternative Financing Program (ATAFP) for Kentucky is the Kentucky Assistive Technology Loan Corporation (KATLC). KATLC provides financial loans for the purchase of assistive technology with its lending partner for individuals with disabilities or the parent or legal guardian of an individual with a disability. KATLC Efforts by OVR staff to provide these available resources to consumers continue to be made. The agency believes that a well-trained professional staff is essential in providing quality services to individuals with disabilities and achieving competitive integrated employment outcomes for agency consumers. The Assistive Technology Branch holds an Assistive Technology Conference annually for Kentucky State University's Research Farm. The 3-day conference ensures awareness of the various programs, services and resources available. Professional continuing education credits for assistive technology professionals occurs annually when the agency partners with the Kentucky Assistive Technology System (KATS) Network and Protection and Advocacy to coordinate a statewide training. The content includes current best practices, emerging trends and issues related to the various aspects of assistive technology. The Summer Assistive Technology Workshops are attended by KYOVR staff, AT professionals, educators, Occupational Therapists, Physical Therapists, and other professionals that have in interest in or contact with AT. KYOVR administers the KATS Network, the Commonwealth's Assistive Technology program. Rehabilitation Engineering and Assistive Technology Society of North America (RESNA) continuing education credits were offered as part of the training to ensure that all agency rehabilitation technology staff maintain the required credits for continuance of their professional certification.

OVR had 5,228 in training status in 2024. OVR increased the number of vendors in 2024 totaling 882.

Objective 5-C: Strengthen existing workforce partnerships, develop new partnerships, and expand learning opportunities.

Strategies 5-C:

- Employer Services Branch will develop and implement a plan to partner with employers who offer jobs in targeted sectors.
- Increase work-based learning opportunities in targeted sectors.
- Train staff using career pathways strategy guides.

Measure 5-C:

- 10% increase in competitive, integrated employment outcomes in targeted sectors.

Progress: The Employer Service Branch oversees the plan for the Coalition for Workforce Diversity. The Coalition coordinates activities between employers, service providers, and people with disabilities to assist them in obtaining jobs. The Coalition focuses on activities with employers to

develop their awareness of the value of hiring people with disabilities as a part of their workforce. The Coalition implemented an expansion plan starting in July of 2024 and expanded to each of OVR's (5) workforce regions with the formation of advisory boards in each area. Since 2020 when the baseline was established, OVR has increased their employment outcomes by 52%.

PEO's program year

2020: 2569 (Baseline)

2021: 3091 (17% increase over the previous year)

2022: 4380 (31% increase over the previous year)

2023: 4,982 (13 % increase over the previous year)

2024: 5,287 (6 % increase over the previous year)

Objective 5-D: Counselors implement a career pathways approach to increase quality employment outcomes.

Strategies 5-D:

- Expand types of employment placements into higher-paying, lower turnover jobs.
- Increase use of Labor Market Information in employment goal development.
- Increase consumer engagement.
- Implement policies that guide the implementation of the career pathway approach through team-based, early intervention strategies.

Measure 5-D:

- Annual increases in the required federal common measures.
- Decrease cases closed "unable to contact/refused services" by 10%.

Progress: In 2024, cases steadily decreased each quarter for "unable to contact/refused services" dropping from 21.2% to 15.3% (-5.9%). OVR median earnings were at $7,768 giving Kentucky a 1st Quartile ranking.

Objective 5-E: Ongoing Systematic Training for all Staff

Strategies 5-E:

- Formation of a Training Development Team
- Develop a systematic training Schedule.

- Implement a systematic training schedule for all staff.

Measure 5-E:

- Training Plan Developed by December 2024.
- Ongoing systematic training is implemented by June 2025.

Progress: OVR established a Training Branch through reorganization in July of 2025. The Training Branch falls under the supervision of the OVR Deputy Director and currently has one training specialist and one vocational rehabilitation administrator. The purpose of the Branch is to assist with the development and implementation of appropriate training programs**.** During 2024, the Case File Review process was utilized to systematically determine the needed training elements to ensure timely, accurate, data driven elements are taking place during case service delivery and follow-up. Ongoing systematic training for all staff is ongoing. The new employee orientation for staff Skills Enhancement Training was held quarterly during the program year to ensure timely training for all onboarding. The training staff regularly disseminate available training resources through statewide emails with emphasis on training for certified rehabilitation counselors, professionals and other paraprofessionals within the agency The agency also purchases access to YesLMS a learning management system dedicated to distribution of vocational rehabilitation trainings. The agency also uses this system to store agency developed trainings. A training plan for all five divisions in the agency is in development with an implementation date of September of 2026.

Objective 5-F: Increase service capacity and customer engagement through additional staff resources.

Strategies 5-F:

- Conduct an assessment of statewide staff needs based on an internal job duties analysis and service delivery trends.
- Develop a talent management plan.
- Recruit and hire staff to fill identified positions.

Measures 5-F:

- Assessment of statewide staff needs completed by June 2024
- Talent Management plan completed by December 2024
- # of Positions Filled

Progress: OVR is currently working on the statewide needs assessment of staff to be completed by June of 2026. The turnover rate for calendar year 2024 was only 6% and OVR was fully staffed. OVR is working on an updated Talent Management Plan to be completed by July of 2026. Annual updates are crucial for succession planning as OVR has several staff in Leadership position that are eligible for retirement.

Public Awareness

Goal 6: Implement an ongoing, flexible outreach plan and process to improve public awareness of VR programs, services, and agency employment. (*Continuing into the next PY*)

Objective 6-A: Implement a comprehensive outreach plan for the agency.

Strategies 6-A:

- Hire a dedicated outreach person.
- Create an outreach plan.
- Develop outreach materials to recruit vendors.
- Outreach materials that reflect current information and are engaging and in accessible formats.
- Outreach materials are made available to staff and consumers.

Measures 6-A:

- Staff hired to oversee outreach.
- All outreach materials are updated and maintained in appropriate, accessible formats.
- Social Media presence on most popular accessible sites.
- All outreach materials will be located for easy access to staff and consumers (agency website/paper material to Perkins for distribution/Docushare Drive).

Progress: OVR utilizes an existing staff person to assist with the creation of processes for outreach. The agency coordinates with the Education and Labor Cabinet Office of Communication in the development and design of needed communications resources and a process for securing the needed materials. The Office of Communication vets and designs materials using Team Kentucky branding for all outreach materials, presentations, videos and annual reports. OVR created an outreach page on the OVR website to house and distribute materials for print or electronic distribution. In addition, OVR created videos for specialized services for underserved populations. OVR maintains a social media presence on Facebook through the Education and Labor Cabinet with accounts dedicated for the agency as a whole and specific accounts for the Carl D. Perkins Vocational Training Center and the Division of Blind Services. The agency ensures that all protocol is followed regarding the release of information that identifies consumers for these outreach initiatives.

Objective 6-B: Recruit talent.

Strategies 6-B:

- Identify a staff representative to work with the Education and Labor Cabinet and Personnel Cabinet on issues related to talent recruitment.

- Identify staff representatives to make presentations to colleges, universities and technical colleges regarding OVR services and employment opportunities.
- Expand the quantity and types of internship programs with university programs.
- Leverage social media as a tool for recruitment.

Measures 6-B:

- Open positions are filled with qualified candidates.

Progress: Internships, fieldwork opportunities and job shadowing all continue to be recruitment and outreach tools for the agency. The agency works with educational entities to provide these opportunities for students. With the implementation of state raises at the agency level as well as statewide initiatives initiated by the governor, the agency has increased success in recruitment, filling positions, and retaining qualified candidates in positions.

The Kentucky Office of Vocational Rehabilitation set the following goals for the distribution of Title VI, Part B Funds. Kentucky has set the following goals to assist with increase employment outcomes for adults and youth with a significant disability.

Goal 1: Increase the number of CRP's providing Supported Employment Services

Objective 1.1: Recruit more providers for supported employment for unserved and underserved areas.

Strategies:

Create a strategic planning team to analyze and develop a viable and comprehensive payment system to community rehabilitation providers.

Progress: The CRP Branch Manager participated in multiple meetings with various states to discuss rates and rate setting. The CRP Branch Manager participated in the bi-monthly Community of Practice (CoP) meetings that addressed and explored rates from other state VR agencies from around the country. Various states provided information to CoP members pertaining to their rates for CRP related services. The CRP Branch Manager and staff developed and disseminated a CRP Sustainability Survey to obtain the perspectives and input of the CRPs. The CRP Branch Manager developed a rate revision proposal for supported employment based on the information obtained from the different sources of information. When exploring possible rate and payment system changes, consideration was given to changes that would increase engagement between the consumer, CRP, and VR staff. A new Supported Employment payment system was approved and fully implemented on October 1, 2024.

Create Establishment Projects to replicate the UPS Transitional Learning Center model and expansion of the IPS and Customized employment models to increase a network of services providers.

Progress: OVR did not pursue establishment projects used to model the UPS Transitional Learning Center. OVR participated of a pilot model that was temporarily implemented between the employer,

Kyosan Denso Manufacturing Kentucky, LLC (KDMK) and a local CRP that was funded through the current service fee memorandum payment structure. The pilot was discontinued due to staffing issues with the CRP.

There was a total of 8 contracts that were developed and implemented related to the expansion of IPS and Customized Employment. KY VR was successful in obtaining Rehabilitation Services Administration (RSA) approval for three (3) Customized and four (4) Individual Placement and Support (IPS) Establishment Project contracts.

In addition, the CRP Branch expanded an existing contract with the University of Kentucky's Human Development Institute (HDI) to provide technical assistance to the new IPS providers, which was vital and necessary to sustain the respective programs.

Increase Capacity in customized employment through participation in the Leadership Series through the University of Kentucky's Human Development Institute.

Progress: Through an existing contract with the University of Kentucky's HDI, KY VR was able to offer opportunities for CRPs to participate in the Leadership Series to acquire certification in customized employment under Marc Gold & Associates training Gateways. Establishment Project contracts for customized employment greatly increased participation within the Leadership Series. Due to changes in staff capacity with HDI, the Leadership Series was discontinued. There are currently four projects specific to customized employment.

OVR applied and was awarded support from national subject matter experts on customized employment through the National expansion of Employment Opportunities Network (NEON) grant in spring 2025. Collaborative efforts toward developing OVR's own CE training program to facilitate credentialing in a timely manner, fidelity, and rate adjustments is underway.

Hold outreach opportunities for potential providers.

Progress: The CRP Branch has initiated conversations with VR Branch Managers and asked that they implement regular dialogue within their staff meetings that focuses on identifying potential providers in their respective areas. Information obtained from these meetings are to be shared with the CRP Branch so that contact can be made to prospective CRPs throughout the state. Each CRP Branch Consultant would network with each prospective CRP to pursue and gauge interest in becoming a CRP.

5. Provide training on new polices related to customized employment, IPS, and person- centered planning.

Progress: The CRP Branch provides training to all new KY VR counselors during Skills Enhancement Training (SET). The CRP Branch has four (4) Consultants that provide training to staff throughout their respective areas address customized employment, IPS, and person-centered planning. The CRP Branch

also provides various trainings and meetings to all CRPs throughout the state on these and other CRP related topics.

Measures:

Increase the number of providers by 5%.

Progress: The number of providers did increase by 5%. In PY 2023-2024. There are no For PY 2024 (7/1/2024 – 6/30/25) the total number of providers was 113, which is an increase of 21%

Implementation of new service fees

Progress: A service fee was established for Extended Services for Youth, which is only for a youth with a disability between the ages of 14-24. A new Supported Employment payment system was approved and fully implemented on October 1, 2024.

Implementation of Establishment projects

Progress: One CRP asked to be released from their establishment project contract. Therefore, there are now a total of seven (7) establishment project grants. An additional contract to provide support (fidelity) was initiated and is consistent with the evidenced-based model. The other four contracts are designed to implement customized employment.

Of Trainings Provided

Progress: CRP Consultants provide quarterly trainings in their respective regions. That equates to 12 trainings per year that are provided regionally. Various consultants provided training at various conferences throughout the year. CRP Quarterly Meetings include subject matter experts to provide trainings to CRPs throughout the state. The CRP Branch provides multiple external training opportunities to CRPs through email correspondence. Each Employment Specialist is required to obtain 15 hours of CEUs annually when providing Supported Employment or Employment and Retention services. CRPs providing pre-Vocational services are required to have 5 hours of CEUs.

Increase in the number of competitive integrated outcomes for individuals in supported employment.

Progress: For PY 2023 (7/1/23-6/30/24) there was a total of 436 successful supported employment outcomes. There was a total of 393 successful supported employment outcomes for PY 2024 (7/1/24-6/30/25).

Goal 2: Monitor Service Quality of Providers

Objective 2.1: Develop strategies for continuous quality improvement in collaboration with the Program Policy and Support Branch.

Progress: The Program, Policy and Support Branch created policies and procedures pertaining to audits, billing, and invoicing of contract providers. A systematic approach for fiscal and programmatic reviews are in place. Training for program administrators was provided.

Strategies:

Ensure agency compliance to WIOA requirements of Section 511 (annually)

Progress: OVR added additional staff under the Program, Policy and Support Branch to oversee compliance of Section 511 among 14C holders. Policies and procedures were developed to provide to aid staff in understanding and consistency of compliance related issues.

Ensure CRP compliance with the terms of their signed service agreements through annual audits and monitoring (annually).

Progress: CRP Branch Consultants conduct monthly audits of CRPs within their respective regions. They record detailed information on the Audit Review Form and provide feedback to the CRP. If significant issues surface through the audit process, then the CRP may be required to participate in a Program Improvement Plan (PIP). Compliance issues are addressed throughout the year and discussed in monthly meetings held by the Consultants and reiterated in the CRP Quarterly Meeting.

Measures:

Annual Audits of Services

Progress: Each CRP Consultant conducts at least 1 audit per month, with 4 consultants, that totals 12 audits per year.

Corrective Action Plans Program Improvement Plans

Progress: There were two (3) Program Improvement Plans implemented in PY 2023 -2024.

Scorecard

Progress: Scorecard modifications necessary for utilization has been put on hold due to the development of the new Case Management System.

Goal 3: Seek alternative strategies for providing and funding Extended Services

Objective 3.1: Provide another source of extended services, if available, so there will be no interruption of services for individuals with significant disabilities.

Strategies:

Seek input from staff and other stakeholders such as education, service providers and individuals with disabilities on extended services.

Identify potential strategies for the provision of services.

Identify potential funding sources. (2023)

Update the Supported Employment Service Fee Memorandum to include extended services to youth.

Measure:

Additional funding secured.

Progress: KY VR developed service fee codes for extended services for IPS, Traditional, and Customized Supported Employment services. Extended services are only to be used by youth with a disability between the ages of 14-21. VR is unable to use funding for extended services to adults participating in supported employment. KY VR participated in conversations regarding the 1915 (i) waiver to expand their service delivery coverage to include supported employment. If approved, those with the (i) waiver could access extended services after funding from VR.

2. PERFORMANCE ON THE PERFORMANCE ACCOUNTABILITY INDICATORS UNDER SECTION 116 OF WIOA FOR THE MOST RECENTLY COMPLETED PROGRAM YEAR, REFLECTING ACTUAL AND NEGOTIATED LEVELS OF PERFORMANCE. EXPLAIN ANY DISCREPANCIES IN THE ACTUAL AND NEGOTIATED LEVELS; AND

WIOA Section 116 (b) (2) (A) and its implementing regulations 34 CFR 361.155 (a) (1) establish the six primary indicators of performance. They are as follows:

Employment Rate in the 2nd Quarter After Exit

Employment Rate in the 4th Quarter After Exit

Median Earnings in the 2nd Quarter After Exit

Credential Attainment rate

Measurable Skill gains (MSG) Rate

Effectiveness in Serving Employers (Statewide)

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.

The RSA team has reviewed with Kentucky the quarterly data dashboards. RSA data rankings for PY 2024 for Kentucky are as follows: for the Median Earnings PY 24 OVR is in the 1st Quartile at $9,164 (met); OVR is in the 1st Quartile for the 2nd Quarter Employment rate at 59.9% (not met); OVR is in the 2nd Quartile for the 4th quarter Employment Rate at 57.7% (met) and Credential Attainment Rate at 26.4% in the 4th Quartile (not met); and for Measurable Skill Gains for PY24, OVR is in the 4th Quartile at 35.7% (met).

OVR met three of the five negotiated rates. The negotiated rate for 2nd Quarter Employment fell slightly below 61 at 59.9. OVR fell below the negotiated rates at 1.1%. For the area of Credential Attainment OVR fell below the negotiated rate of 29 at 26.5% just 2.5% below. OVR continues to provide staff guidance on timely data entry. This continues to be an area of needed improvement in order to accurately capture the attainment of measurable skill gains in the system. Another factor is the difficulty staff have in obtaining this information in a timely manner from VR consumers. Once OVR implements

the new case management system in 2026 this will provide more accuracy of reporting from staff for required fields.

The current Kentucky OVR VR Case Management System (CMS): a web-based system used to collect required data, enforce workflow 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.

The current CMS system has reached its useful life expectancy. OVR is in process of development of a new system with a vendor that is targeted for implementation mid-year 2026. 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.

3. THE USE OF FUNDS RESERVED FOR INNOVATION AND EXPANSION ACTIVITIES (SECTIONS 101(A)(18) AND 101(A)(23) OF THE REHABILITATION ACT) (E.G., SRC, SILC).

Office of Vocational Rehabilitation (OVR) will use innovation and expansion funds to support the Statewide Council for Vocational Rehabilitation (SCVR), Kentucky's SRC, including all meeting expenses and expenses related to conducting the Annual Report, Consumer Satisfaction Survey (CSS) and Comprehensive Statewide Needs Assessment (CSNA), Establishment Projects and for the support of the Statewide Independent Living Council (SILC).

Innovation and Expansion Activities for PY 2025:

1. SCVR Annual Report:

The 2025 SCVR Annual Report was completed during PY 2025. The data in the report reflects the growth of services during the 2025 federal fiscal year. The report contains statistical data, consumer stories and a brief update regarding programs and services. The report contains a comprehensive fiscal overview this year as required by Senate Bill 103. The SCVR Annual Report is submitted to the Commissioner of RSA, the Governor of Kentucky and state Legislators each year and provides reports according to the FFY.

2. OVR Consumer Satisfaction Survey (CSS):

As part of federal requirements, OVR has collaborated with the SCVR and the HDI since 1996 to coordinate the annual OVR Consumer Satisfaction Survey (CSS). The 2024 Consumer Satisfaction Survey gathered feedback from 1,000 individuals whose cases with closed in fiscal year 2024. The survey was conducted via phone (15%) and online (85%) with an overall response rate of 17%. Respondents represented all closure categories: 72.9% closed Successful in Competitive Integrated Employment (CIE); 15.7% closed Unsuccessful after individualized plan for employment (IPE) was

initiated; 6.9% closed from Acceptance Prior to IPE; and 4.5% closed from Application. The average satisfaction rating was 3.51 out of four with 88.2% rating services as good or very good. Consumers closed Successful in CIE were mostly satisfied (mean = 3.78). Counselor and office experiences were rated positively. Over 93% agreed that offices were accessible, materials were provided in accessible formats and staff were courteous. Nearly 90% reported being able to get timely appointments while 92% agreed their counselor understood their disability. Job goal selection and understanding of rights were also well supported. Employment outcomes showed that 91.7% of those closed in CIE were employed at the time of the survey. Overall, 94.3% of employed respondents were satisfied with their work and 86.8% with their salary. Most respondents agreed that VR services helped prepare them for employment. Case closure results indicated 86% knew when their case was closed and 85.2% agreed closure was appropriate. Nearly 90% knew they could reapply for services and 93.4% stated they would return to OVR if needed. For those using Community Rehabilitation Programs (CRPs), 80.8% were satisfied and 82.2% would recommend CRP services. Among Blind Services recipients, 70% rated McDowell Center training as good or excellent, 57% rated orientation and mobility services as excellent and 100% rated Braille services as excellent. Open-ended comments reflected appreciation for support, requests for better follow-up, and concerns regarding communication and staff turnover. Historical data from 1997–2024 continues to show consistently higher satisfaction among consumers closed Successful in CIE.

3. Comprehensive Statewide Needs Assessment (CSNA):

OVR contracted with the University of Kentucky, Human Development Institute (HDI) to complete the 2027 triennial Comprehensive Statewide Needs Assessment (CSNA) to identify gaps in existing services that can be reduced through programs and policies by the OVR. A mixed method of online surveys and forums was used to collect insights about the rehabilitation needs of Kentuckians with disabilities. The 2027 CSNA, a collaboration between the State Rehabilitation Council, HDI and OVR is currently underway. The results of the assessment will be used to inform the SRC and OVR information for setting the goals and priorities for the next state plan submission The CSNA is performed at least once every three years to assess the needs of individuals throughout the state and advise the agency regarding steps to take to ensure accessible and equitable service.

4. SILC

OVR provided the Statewide Independent Living Councils (SILC) the amount of $65,000 for innovation and expansion activities from Basic Support Grant Funds. OVR is committed to provide funding for the SILC on an annual basis. The SILC provided OVR with a resource plan that outlines the funding allowable under 34 CFR 361.35 Innovation and Expansion Activities Resource Plans for Statewide Independent Living Councils and provides quarterly reports to OVR as required. The funds will be utilized for the support of the salary of the SILC Coordinator and expenses of the Council. OVR has staff from the Older Blind/ Independent Living Branch represents the agency on the Council. The SILC in Kentucky is their own 501C 3.

5.Establishment Projects

OVR established contracts with four community rehabilitation providers for Individual Placement and Supports (IPS) projects for a four-year period that ends June 20, 2026. IPS is an evidence-based supported employment program, based on eight principles, including Rapid Job Development, Competitive Employment, Systematic Job Development, Integrated Services, Benefits Planning, Zero Exclusion, Time-Unlimited Supports and Worker Preferences. The IPS Model of Supported Employment has proven to be a successful approach for individuals with Serious Mental Illness and Substance Use. Funding through these contracts is used to provide IPS Supported Employment (SE) for individuals with Serious Mental Illness (SMI), substance use disorders, and to individuals with intellectual and/or developmental disabilities. OVR will continue to be a partner in the IPS International Learning Collaborative and will provide data that may be used throughout partnering efforts.

OVR established contracts with three community rehabilitation providers for Customized Employment for a four-year period ending in June of this year, 2026. Training for customized employment under the Marc Gold & Associates model of customized employment was difficult to carry out. OVR, along with the Employment First Council, the Human Development Institute and the Department of Behavioral Health have worked with the NEON project under the Department of Labor on the development of training for customized Employment in Kentucky.

E. SUPPORTED EMPLOYMENT SERVICES, DISTRIBUTION OF TITLE VI FUNDS, AND ARRANGEMENTS AND COOPERATIVE AGREEMENTS FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES.

1. ACCEPTANCE OF TITLE VI FUNDS:

(A) VR agency requests to receive title VI funds.

2. IF THE VR AGENCY HAS ELECTED TO RECEIVE TITLE VI FUNDS, SECTION 606(B)(3) OF THE REHABILITATION ACT REQUIRES VR AGENCIES TO INCLUDE SPECIFIC GOALS AND PRIORITIES WITH RESPECT TO THE DISTRIBUTION OF TITLE VI FUNDS RECEIVED UNDER SECTION 603 OF THE REHABILITATION ACT FOR THE PROVISION OF SUPPORTED EMPLOYMENT SERVICES. DESCRIBE THE USE OF TITLE VI FUNDS AND HOW THEY WILL BE USED IN MEETING THE GOALS AND PRIORITIES OF THE SUPPORTED EMPLOYMENT PROGRAM.

Funding will be used for the implementation of supported employment services throughout KY. Funds will be utilized through the current Service Fee Memorandum payment structure to Community Rehabilitation Program providers who provide supported employment services, which is currently based on a hybrid payment system. This includes both an hourly payment system for services provided as well as outcomes achieved. These payments are available for consumers who may require customized employment, Individual Placement and Support (IPS), which is an evidenced-based model of Supported Employment (SE) for individuals with Serious Mental Illness (SMI), or those who may benefit from the

more traditional model of SE. The rates used by OVR should create higher level of provider confidence in regard to establishment and sustainability of their respective supported employment programs.

3. SUPPORTED EMPLOYMENT SERVICES MAY BE PROVIDED WITH TITLE 1 OR TITLE VI FUNDS FOLLOWING PLACEMENT OF INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES IN EMPLOYMENT. IN ACCORDANCE WITH SECTION 101(A)(22) AND SECTION 606(B)(3) OF THE REHABILITATION ACT, DESCRIBE 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; AND THE TIMING OF TRANSITION TO EXTENDED SERVICES.

The Office of Vocational Rehabilitation (OVR) provides supported employment on a statewide basis. The OVR works with current Community Rehabilitation Programs (CRPs) to expand supported employment services throughout Kentucky to ensure multiple CRP options for eligible consumers.

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 113 supported employment providers throughout the state.

Extended 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 services. Natural supports are encouraged (such as co-workers, peers, etc.) and are carefully monitored by the supported employment provider.

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 services for these two groups. Individuals with other disabilities are served if funding for extended services are available and if the supported employment provider has the expertise to meet that individual's needs for employment training and support.

Kentucky has become the 12th state to participate in the Individual Placement and Support (IPS) model of supported employment, which is an evidenced-based practice. The goal is to demonstrate the effectiveness of the IPS model for supported employment for people with serious mental illness throughout Kentucky. In July 2011, four sites in Kentucky began pilot site implementation. In 2012, two sites were added. In 2013, three sites were added. In 2014 BHDDID required that all Community Mental Health Centers implement the IPS program as one of the four evidence-based practices required in their state plan. A Statewide Coordinator, employed through the University of Kentucky, Human Development Institute, oversees the pilot sites. In 2021, the OVR began the process to implement 4 Establishment Project contracts to expand IPS in KY. This initiative was successful and began

implementation in March of 2023. Two of these contracts are designed to serve individuals with intellectual and developmental disabilities. This is an innovative strategy by KY VR, and information obtained through this process will be shared with other state VR agencies and countries within the national IPS Learning Community. These contracts will end in June of 2026.

Currently there are 21 providers in KY that provide IPS supported employment services, which serves 78 of the 120 counties in Kentucky. OVR has implemented an agreement with the University of Kentucky for the purpose of increasing technical and fidelity monitoring to support new IPS providers.

The OVR and the Kentucky Department for Behavioral Health, Developmental, and Intellectual Disabilities 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 services. To ensure that supported employment services are provided according to regulation, the following guidelines must be met:

1. Services will be provided to individuals with the most significant disabilities who have a documented need for supported employment services, including extended services.

2. Work will be performed on a full-time or part-time basis. Everyone 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 follow the 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 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 services are tailored to meet the needs of the consumer.
- 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 Community Rehabilitation Branch and University of Kentucky's Human Development Institute, according to the needs of the provider. Completion of the Supported Employment Training Project is a requirement for all CRP Employment Specialists. This is funded through a Memorandum of Agreement between the Department of Behavioral Health Developmental and Intellectual Disabilities and the OVR. The Supported Employment Training Project is conducted by the University of Kentucky's Human Development Institute.

Technical assistance is also provided by the OVR CRP Branch staff. A CRP manual and other policies and guidelines were developed for vocational rehabilitation counselors and CRP staff. These are periodically revised and updated so that staff may better understand the rehabilitation process regarding supported employment. 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 OVR services, supported employment will be considered as a possible vocational outcome for individuals with the most significant disabilities.

The OVR will be able to provide supported employment services through approved vendors and/or individual providers.

These services include:

1. Development of a Person-Centered Employment Plan (PCEP). Vocational Profile, or Career Profile with recommendations for job- development;
2. Individually designed job development services, including assistance with customization, job carving, reasonable accommodation, technology and/or other support strategies;
3. Intensive on-the-job skills training and other support services provided by supported employment specialists and/or co-workers and employers;
4. Time-unlimited follow-up services (including regular contact with employer, trainee, parent, guardian, or others deemed appropriate) throughout the consumer's term of employment;
5. Other services needed to support the individual, such as travel, training, employment advocacy, non-employment advocacy, and counseling; and
6. Development of an Extended Services Plan, which includes an outline of the extended services 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 services for individuals not considered as youth will be the responsibility of other 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 funding for extended 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 planning for these services before the Vocational Rehabilitation case is closed.

The OVR 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-two percent (52%) stated that there are Community Rehabilitation Program (CRP) providers in their area that provide CSE. However, 62% also stated that it's not readily available due to limited staff or oversized caseloads. Around 93% 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, 85% stated that there was a need. Over 46% stated that they have at least 4 or more consumers on their caseloads that could benefit from CSE. Over 17% state that they have at least 8 or more consumers that need this service.

As a result, the OVR implemented 3 Establishment Project MOAs 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 that end this year on June 30, 2026. OVR is exploring the implementation of a customized employment fidelity scale. The OVR CRP Branch staff participates in supported and customized employment Community of Practice meetings, which includes ongoing discussions pertaining to the development and implementation of fidelity scales.

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 CRP Branch has worked closely with national subject matter experts in the field of customized employment through the National Expansion of Employment Opportunities Network grant. Activities through this grant include the development of customized employment training and standards in customized employment practices that will be provided to CRPs and OVR counselors. KY's model will be shared nationally through additional NEON opportunities.

Timing of Transition to Extended Services

Currently, transition from Title VI, Part B funds to various other individually determined funding sources begins after the individual has achieved stability on the job. However, if the individual is considered a "youth with a disability" then OVR may fund extended services for a minimum of 90 days leading to closure.

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 include youth with the most significant disabilities. Services may be provided by a 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.

OVR will work with providers to ensure another source of extended services to youth are available so there will be no interruption of services for individuals with significant disabilities.

4. SECTIONS 101(A)(22) AND 606(B)(4) OF THE REHABILITATION ACT REQUIRE THE VR AGENCY TO DESCRIBE EFFORTS TO IDENTIFY AND ARRANGE, INCLUDING ENTERING INTO COOPERATIVE AGREEMENTS, WITH OTHER STATE AGENCIES AND OTHER

APPROPRIATE ENTITIES IN ORDER TO PROVIDE SUPPORTED EMPLOYMENT SERVICES. THE DESCRIPTION MUST INCLUDE EXTENDED SERVICES, AS APPLICABLE, TO INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES, INCLUDING THE PROVISION OF EXTENDED SERVICES TO YOUTH WITH THE MOST SIGNIFICANT DISABILITIES IN ACCORDANCE WITH 34 C.F.R. § 363.4(A) AND 34 C.F.R. § 361.5(C)(19)(V).

The Office will seek to expand services to unserved and underserved counties as well as unserved and underserved disability groups, including youth with the most significant disabilities. We 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 services.

OVR will continue to do the following:

1. Maximize existing dollars for extended 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;
2. Partner with local Community Mental Health Centers;
3. Recruit new Providers;
4. Provide training and technical assistance to new supported employment agencies;
5. Provide consultation and technical assistance to OVR staff and providers as needed; and
6. Research better ways to fund and/or deliver services.

Meetings with the Department of Behavioral Health and Developmental and Intellectual Disabilities (ID/DD) are ongoing to strengthen the partnership by leveraging funding to expand IPS SE services in unserved and underserved areas.

For example, the OVR worked diligently over a two-year period on development and implementation of Rehabilitation Services Administration (RSA) approved Establishment Project MOAs for the sole purpose of expanding IPS to individuals with serious mental illness and individuals with ID/DD. Four IPS MOAs were implemented in the spring of 2023. Two of which are designated for ID/DD. KY is one of just a couple of states in the country that is utilizing this evidenced-based model for individuals with ID/DD. KY OVR will assess and evaluate this initiative and report findings to the National IPS Learning Collaborative, so information can be used by other states who may be considering similar initiatives. Additionally, a contract was developed and implemented with the University of Kentucky's Human Development Institute for the purpose of strengthening the infrastructure for IPS sustainability by expanding technical assistance support and fidelity monitoring. Through this contract, a State IPS Trainer and IPS Fidelity Monitor were hired to provide needed support for staff hired through the Establishment Project MOAs. These MOAs will expire at the end of June 2026.

Additionally, the OVR developed Customized Employment initiatives and sought RSA approval for the implementation of three (3) Customized Supported Employment (CSE) Establishment Project MOAs for the purpose of expanding customized employment throughout Kentucky. These MOAs will expire at the end of June 2026.

The OVR established billing codes for extended services for youth who are participating in supported employment. The purpose of this billing method is to aid in the expansion of services to youth in supported employment with collateral benefits that address sustainability concerns among CRPs. Implementation of billing for Extended Services to youth in supported employment began in October of 2022.

The Office will collaborate with the Department of Behavioral Health, Developmental and Intellectual Disabilities (DBHDID) to expand supported employment options to unserved and underserved groups, as well as youth with the most significant disabilities without delay.

1. 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.

2. 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

3. Utilization of interagency workgroups to develop better understanding and expand awareness of work incentives (such as in SCL Waiver, Social Security, etc.).

4. Developing and implementing the IPS Supported Employment programs for consumers with severe mental illness within the community mental health centers.

5. Collaborate with DBHDID on the implementation of IPS for individuals with Autism and nationally recognized research through the National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR). KY is the only state participating in this research. There are four Community Mental Health Centers participating in the study, which will be conducted over a three-year period. The initial phase began October 2025.

F. ANNUAL ESTIMATES

Sections 101(a)(15) and 101(a)(23) of the Rehabilitation Act require all VR agencies to annually conduct a full assessment of their resources and ability to serve all eligible individuals before the start of the Federal fiscal year. In accordance with 34 C.F.R. § 361.29(b), annual estimates must include the following projections:

1. ESTIMATES FOR NEXT FEDERAL FISCAL YEAR—

A. VR PROGRAM; AND

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Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under VR Program	Costs of Services using Title I Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
1	14,576	18,455	38,228,518	3,879
2	4,486	5,796	11,701,231	1,310
3	365	455	760,479	90
4	8	8	9,825	0

B. SUPPORTED EMPLOYMENT PROGRAM.

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Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field and start over if needed.

Priority Category (if applicable)	No. of Individuals Eligible for Services	No. of Eligible Individuals Expected to Receive Services under Supported Employment Program	Costs of Services using Title I and Title VI Funds	No. of Eligible Individuals Not Receiving Services (if applicable)
1	9,412	3,975	$4,757,419	460

G. ORDER OF SELECTION

1. PURSUANT TO SECTION 101(A)(5) OF THE REHABILITATION ACT, THIS DESCRIPTION MUST BE AMENDED WHEN THE VR AGENCY DETERMINES, BASED ON THE ANNUAL ESTIMATES DESCRIBED IN DESCRIPTION (F), THAT VR SERVICES CANNOT BE PROVIDED TO ALL ELIGIBLE INDIVIDUALS WITH DISABILITIES IN THE STATE WHO APPLY FOR AND ARE DETERMINED ELIGIBLE FOR SERVICES.

* VR agencies may maintain an order of selection policy and priority of eligible individuals without implementing or continuing to implement an order of selection.

The VR agency is implementing an order of selection with one or more priority categories closed.

2. FOR VR AGENCIES THAT HAVE DEFINED PRIORITY CATEGORIES DESCRIBE—

A. 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 the following:

Population data related to disability incidence;

Short and long-term budgetary outlook;

Projected changes in service costs and budgetary resources, cost for assessment services,

Projected annual costs for administering the program;

Projected numbers of new applicants, current active IPE's, outstanding authorizations, and attrition; and

Short and long-term staffing projections and other staff related costs such as salaries and benefits;

Operational costs including required studies such as the Consumer Satisfaction Survey and the Comprehensive Statewide Needs Assessment;

Waiting list for services; and

VR Counselor caseload size and expenditures.

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.

According to data from the 2021 American Community Survey (ACS), published in the Annual Compendium of Disability Statistics, 39% of Kentucky civilians living in the community report having a disability. According to this resource, Kentucky's overall population is 3,414,123 people. Using the percentage in 2021 and applying it to the population numbers, there is an estimated 1,330,951 people in the state of Kentucky who have a disability. The overall rate of individuals with a disability in the United States is 28.3% for 2021. The rate in Kentucky is higher than the rate nationally by 10.7%. The

percentage of residents of working age (18-64) in Kentucky who are employed is 76% for 2021. The national average was 76.6% in 2021. In this instance of employment, the rate in Kentucky is slightly lower than the rate nationally.

Introduction

After careful review of the agency's current and projected fiscal and personnel resources, the determination was made to implement an order of selection in May of 2025. The projected available funds were not adequate to provide the full range of VR services to all eligible individuals with a disability who apply for services.

Factors influencing this decision include analysis of short- and long-term budgetary outlook, staffing variables, VR counselor's caseload size and expenditures, the comprehensive statewide needs assessment (CSNA), population data related to disability incidence, input from the State Rehabilitation Council and the public.

Factors that will not be considered are duration of residency, type of disability, age, sex, race, color or national origin, source of referral, type of expected employment outcome, the need for specific services except those services provided in accordance with 361.36(a)(3)(v), or anticipated cost of services required by an individual or income level.

OVR implemented order of selection closing all categories in May of 2025. OVR reviews fiscal and programmatic data weekly, monthly, and quarterly at the start of every FFY when order of selection is in place analyzing the agency's fiscal and personnel resources.

Budgetary Outlook

Due to the rising service costs, challenges in maintaining qualified staff levels and increases in employee salaries, OVR experienced an increase in overall costs. To manage program needs within available resources, OVR closed all categories and utilized additional non-federal resources to balance the FFY 25 budget. (See Table 5 and 6).

Congress has increased the federal grant award four out of the last 5 years, increasing the match requirements. The required state match comes from the State General Fund, which is only appropriated every two years, making it difficult to keep up with the federal award increases. Due to these circumstances, OVR had to reallocate funds to stay in compliance with the regulations set forth by U.S. Department of Education and to stay in good standing with RSA. In addition to the U.S Department of Education Grants, OVR has financial resources from Program Income and utilizes some of this to assist

the Older Individuals Who Are Blind program to ensure effectiveness and sustainability, which is critical to serving this growing population within the state.

OVR had a significant increase in consumer referrals and applications in FFY 2024 and FFY 2025, and the data trends show continued growth and the potential for a more significant increase in these areas.

While efforts in outreach and addressing needs identified in the CSNA have been successful in creating more visibility to the VR program, they may have also contributed to the high increase in referrals, applications and services provided. Kentucky is one of the top three states in the nation with the highest disability prevalence at 18.1%, which is worth noting for forecasting the need for VR services. There is reason to expect and prepare for more individuals with disabilities seeking VR services. Based on the high disability prevalence in the state, the agency foresees that more qualifying individuals will seek VR services in the next coming years as we have seen, and expenses will rise to try and meet those needs to maintain quality services. Another possible contributing factor is the availability of virtual appointments for individuals seeking services. This option allows counselors to schedule additional appointments and appears to have reduced the number of missed appointments and cancellations. Overall, virtual appointments have improved the efficiency and effectiveness of application and authorization processing. Given that transportation for individuals with disabilities is a huge barrier, virtual offerings allow OVR to remove that barrier.

FFY 25 Expenses Basic Support Only *(Table 5)*

Salary and Fringe	$ 41,135,010
Other Personnel	$ 3,168,458
Indirect Cost	$ 5,893,592
Operating Cost	$ 8,787,801
Benefits	$ 44,964,943
Capital Outlay	$ 867,968
Capital Projects	$ 525,869
Total	**$ 105,343,641**

FFY 25 Available Funding Basic Support Only (Table 6)

RSA Vocational Rehab FFY24 Award	$ 5,835,242.
RSA Vocational Rehab FFY25 Award	$ 70,853,118.
Social Security Administration 2024	$ 331,819
Social Security Administration 2025	$ 2,747,699.
KY Business Enterprises – Unassigned Vending and Vendor Set-A-Side FFY24	$ 72,167
KY Business Enterprises – Unassigned Vending and Vendor Set-A-Side FFY25	$ 386,123.
Non-Federal Share FFY25	$ 25,117,473
Total	**$ 105,343,641.**

Growing Cost of Providing Services

Table 7 below shows the growing costs of providing services over the past four years from FFY 2022 through FFY 2025. 44,964,943.

Growing Cost of Consumer Services (Table 7)

FFY 2022	$ 21,457,159
FFY 2023	$ 33,989,584
FFY 2024	$ 44,294,493
FFY 2025 (categories closed in May)	$ 44,964,943

VR Caseload

Since the implementation of Order of Selection in May of 2025, Counselor caseloads have decreased 24%. Currently, the average caseload size for counselors is 230.

Even with the implementation of Order of Selection in May of 2025, OVR increased Competitive Integrated Employment (CIE) Outcomes by 728 over the previous year. CIE in FFY 2024 was 4,915 compared to 5,643 in FFY 2025.

Programmatic Data and Fiscal Forecasting

Prior to the Implementation of Order of Selection, OVR utilized FFYs 2021 through 2024 (4 years) as a basis for its programmatic data analysis and fiscal forecasting. OVR continues to utilize data to inform decision making regarding Order of Selection.

OVR has in place a process for fiscal forecasting and programmatic data analysis. OVR analyzes expenditures for each priority category and by applicant as well as by case status and distinct case count to monitor the availability of funds for serving the waitlist.

While in Order of Selection, individuals who are beneficiaries of Social Security Disability Insurance (SSDI) or recipients of Supplemental Security Income (SSI) for disability reasons are presumed eligible for VR Services. In all cases, OVR ensures comprehensive assessments are conducted in order to sufficiently assess eligibility while operating under order of selection. If the individual is determined eligible, they will be assigned to a Priority Category based on their functional limitations and either develop an IPE or be placed on a wait list. Individuals will receive contact information for other employment programs or other services that may be able to assist them.

Cost Saving Measures for Order of Selection

With Order of Selection in place, all categories closed, OVR has in place cost saving measures. All personnel actions remain on hold, and every vacancy will be scrutinized to ensure it is needed for crucial programmatic services. Leadership will thoroughly review contractual agreements and identify areas of cost cutting measures. Capital projects are now limited to those required for mechanical or programmatic necessity. All agencies sponsored out-of-state travel for conferences are discontinued. OVR has requested managers for a prioritization of virtual options for meetings, trainings and other staff meeting interactions. Managers have been reviewing all in-house purchases for supplies.

When vacancies occur through attrition, OVR is utilizing staff that remain to redistribute duties to ensure that quality services to individuals continue and they are provided within the required federal timelines.

B. THE ORDER (PRIORITY CATEGORIES) TO BE FOLLOWED IN SELECTING ELIGIBLE INDIVIDUALS TO BE PROVIDED VR SERVICES ENSURING THAT INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES ARE SELECTED FOR SERVICES BEFORE ALL OTHER INDIVIDUALS WITH DISABILITIES; AND

OVR, in consultation with the SRC, determined that it will not be able to serve all eligible individuals with a disability and must implement an order of selection. In accordance with 34 CFR 361.36(a)(1), when an agency determines that it will not be able to provide services to all eligible individuals in the state who apply for the services, the agency must implement an order of selection.

Based on factors stated in the justification of this section, the agency will prioritize those individuals with the most significant disability being served, first.

OVR Priority Categories

On March 17, 2025, OVR leadership met with the RSA team regarding the amendment for the state plan. When the OOS amendment was submitted to RSA, they identified duplicative language in the priority category definitions for Priority Category 1 and Priority Category 2. In seeking to implement OOS, RSA identified that the agency included “most significant” in both Priority Category 1 and 2 and therefore was required to treat both categories the same, either both open or both closed. There were insufficient funds to leave both categories open; and therefore, OVR closed all categories. Closing all categories allowed OVR time to update the priority category definitions to comply with federal law. Individuals with the most significant disabilities will be selected first for the provision of vocational rehabilitation services. OVR will assure that individuals who do not receive services immediately are provided information and referral.

The agency has amended its administrative regulations to implement the following four (4) priority categories, which comply with federal law to ensure eligible individuals with the most significant disabilities are selected for services before other individuals with disabilities:

The order of selection priority categories as follows:

(a) Priority Category 1: Individual with a most significant disability is an individual with a disability who has been determined eligible for vocational rehabilitation services, requires multiple vocational rehabilitation services for a period of six (6) months or more, and experiences serious limitations in four (4) or more areas of functional capacity, in terms of an employment outcome.

(b) Priority Category 2: Individual with a significant disability is an individual with a disability who has been determined eligible for vocational rehabilitation services, requires multiple vocational rehabilitations services for a period of six (6) months or more and experiences serious limitations in three (3) areas of functional capacity, in terms of an employment outcome.

(c) Priority Category 3: Individual with a significant disability is an individual with a disability who has been determined eligible for vocational rehabilitation services, requires multiple vocational

rehabilitation services for a period of six (6) months or more, and experiences serious limitations in one (1) to two (2) areas of functional capacity, in terms of employment outcome.

(d) Priority Category 4: Individual with a disability is an individual who has been determined eligible for vocational rehabilitation services and does not meet the criteria for priority categories one, two, or three.

Eligibility

In accordance with 34 C.F.R. 361.42(a), the following criteria are used by the Vocational Rehabilitation Counselor to determine eligibility for Vocational Rehabilitation services:

(a) An individual who has a physical or mental impairment that constitutes or results in substantial impediment to employment; and

(b) An individual who needs rehabilitation services to prepare for, secure, retain, advance in, or regain employment that is consistent with the individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice with a goal of an employment outcome; and

(c) An individual who meets the criteria set forth above and who has been determined eligible for Social Security benefits under Title II or Title XI of the Social Security Act is presumed eligible and is considered an individual with a significant disability.

Closed Categories
OVR closed all priority categories.

C. THE VR AGENCY'S GOALS FOR SERVING INDIVIDUALS IN EACH PRIORITY CATEGORY, INCLUDING HOW THE AGENCY WILL ASSIST ELIGIBLE INDIVIDUALS ASSIGNED TO CLOSED PRIORITY CATEGORIES WITH INFORMATION AND REFERRAL, THE METHOD IN WHICH THE VR AGENCY WILL MANAGE WAITING LISTS, AND THE PROJECTED TIMELINES FOR OPENING PRIORITY CATEGORIES. NOTE: PRIORITY CATEGORIES ARE CONSIDERED OPEN WHEN ALL INDIVIDUALS IN THE PRIORITY CATEGORY MAY BE SERVED.

The agency, in consultation with the SRC, determined that the agency lacks available projected funds and personnel resources 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.

e All priority categories are closed. The Executive Director shall direct the order of selection by designating in written memorandum, the priority category to be served. The following describes how the agency will assist eligible individuals assigned to closed priority categories and how the wait list, information and referral will be managed. The order of selection shall be implemented on a statewide basis.

The order of selection will not use any of the following factors in determining eligible individual's 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 not affect: a) the acceptance of referrals and applicants; b) the provision of assessment services to determine whether an individual is eligible for vocational rehabilitation services; c) the individual's priority category assignment under the order of selection; and d) 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. 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.

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.

On the day that all priority category closure occurs, the following will be true for these groups of consumers:

1. Individuals who have an Individualized Plan for Employment (IPE) that was implemented prior to the closure of priority categories, will continue to receive services as indicated on their IPE regardless of their priority category assignment.
2. Individuals who have been determined eligible and assigned a category, but do not have an IPE written, will be placed on the wait list.
3. Individuals who have applied but have not been determined eligible and assigned a priority category, will have their eligibility determined, assigned a priority category and placed on the wait list.

The process for the waiting list is as follows:

Once an individual has been determined eligible and assigned to a closed priority category by the Vocational Rehabilitation Counselor, the individual will receive notification through the counselor in writing of:

1. The individual's assignment to a particular category;
2. The priority categories currently being served;
3. The individual's right to appeal the category assignment and the availability of the Client Assistance Program (CAP);

4. Information and referral services; and
5. The individual is informed that they have been placed on a wait list until the time the agency is able to provide them with services.
6. The contact information of their counselor so they may request additional information.

The waiting list will be maintained by the Director of Field Services and reviewed quarterly by both the Director of Field Services and the Regional Managers.

Consumers on the wait list will be contacted quarterly to inform them of the status of Order of Selection and their specific priority category. The consumer will be asked regarding their preference for remaining on the waiting list.

At the time when funds become available, the agency will serve consumers from the wait list based on priority category or if sufficient funds are available open a category prioritizing those who are most significant disability.

1. 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 with the 1973 Rehabilitation Act, as amended by WIOA, in accordance with 34 CFR 361.37.
2. Consumers will be provided with contact information for other Federal and State programs including the statewide workforce investment programs.
    a. 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).

Consumers who do not wish to remain on the wait list may contact their counselor and request that their case be closed. They will receive notification from their VR Counselor when the case has been closed 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.

Quarterly, the Executive Director, Executive Leadership Team, and SRC along with fiscal staff will reevaluate the agency circumstances to determine whether the agency's resources are sufficient in serving all individuals or if there is a need to make changes in Order of Selection. At such time that the agency finds it is able to serve those individuals on the wait list, the consumer will be contacted to determine if they want to move forward with implementing an IPE. If at any time the agency finds that they have the resources to serve some individuals but not all individuals on the wait list, the date of application will be utilized as a criterion for ranking individuals within a priority category. 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.

3. HAS THE VR AGENCY ELECTED TO SERVE ELIGIBLE INDIVIDUALS OUTSIDE OF THE ORDER OF SELECTION WHO REQUIRE SPECIFIC SERVICES OR EQUIPMENT TO MAINTAIN EMPLOYMENT?

No.

H. WAIVER OF STATEWIDENESS.

The State plan shall be in effect in all political subdivisions of the State, however, the Commissioner of the Rehabilitation Services Administration (Commissioner) may waive compliance with this requirement in accordance with Section 101(a)(4) of the Rehabilitation Act and the implementing regulations in 34 C.F.R. § 361.26. If the VR agency is requesting a waiver of statewideness or has a previously approved waiver of statewideness, describe the types of services and the local entities providing such services under the waiver of statewideness and how the agency has complied with the requirements in 34 C.F.R. § 361.26. If the VR agency is not requesting or does not have an approved waiver of statewideness, please indicate "not applicable."

Not Applicable

I. COMPREHENSIVE SYSTEM OF PERSONNEL DEVELOPMENT.

In accordance with the requirements in Section 101(a)(7) of the Rehabilitation Act, the VR agency must develop and maintain annually a description (consistent with the purposes of the Rehabilitation Act) of the VR agency's comprehensive system of personnel development, which shall include a description of the procedures and activities the State VR agency will undertake to ensure it has an adequate supply of qualified State rehabilitation professionals and paraprofessionals that provides the following:

1. ANALYSIS OF CURRENT PERSONNEL AND PROJECTED PERSONNEL NEEDS INCLUDING—

A. THE NUMBER OF PERSONNEL CURRENTLY NEEDED BY THE VR AGENCY TO PROVIDE VR SERVICES, BROKEN DOWN BY PERSONNEL CATEGORY; AND

B. THE NUMBER AND TYPE OF PERSONNEL THAT ARE EMPLOYED BY THE VR AGENCY IN THE PROVISION OF VOCATIONAL REHABILITATION SERVICES, INCLUDING RATIOS OF QUALIFIED VOCATIONAL REHABILITATION COUNSELORS TO CLIENTS;

C. PROJECTIONS OF THE NUMBER OF PERSONNEL, BROKEN DOWN BY PERSONNEL CATEGORY, WHO WILL BE NEEDED BY THE VR 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.

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Note, please do not edit the table header or formatting. Only edit the table contents.

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Personnel Category	No. of Personnel Employed	No. of Personnel Currently Needed	Projected No. of Personnel Needed in 5 Years
Adaptive Equipment Specialist II	1	1	2
Administrative Branch Manager	2	0	1
Administrative Specialist	28	23	7
Administrative Specialist Senior	52	9	13
Administrative Supervisor	5	0	1
Assistant Director II	4	0	3
Budget Support Specialist	1	0	0
Construction Superintendent I	1	1	0
Deputy Executive Director	1	0	1
Disabilities Assistance Special/Driver	3	0	2
District Food Operations Evaluator	1	0	1
Division Director	3	2	3
Electronic Technician III	1	0	1
Executive Director	1	1	1
Executive Staff Advisor	1	0	0
Facilities Security Officer I	5	2	3
Facility Administrator	1	1	1
Facility Maintenance Worker I	2	2	2
Facility Maintenance Worker II	1	1	1

Fiscal Officer	1	0	1		
Food Service Coordinator	1	0	1		
Grants Administrator	2	2	2		
IT Business Analyst	1	0	0		
IT Business Analyst Senior	4	1	3		
Licensed Practical Nurse	5	0	3		
Maintenance Manager	1	0	1		
Mechanical Maint & Operations Techn I	2	0	2		
Nurse Shift/Program Supervisor	1	0	0		
Occupational Therapist	4	0	2		
Office Support Assistant I	1	0	1		
Office Support Assistant II	1	0	1		
Patient Aide I	3	0	1		
Physical Therapist Assistant	1	0	1		
Procedures Development Specialist II	1	1	1		
Program Coordinator	3	1	2		
Regional Program Manager	4	1	4		
Registered Nurse	3	0	1		
Rehabilitation Care Aide	1	0	1		
Speech Pathologist II	1	1	2		
Staff Assistant	1	0	1		
Training Development Specialist II	1	1	4		
Voc Rehab Administrator I	13	1	6		
Voc Rehab Administrator II	8	0	3		
Voc Rehab Branch Manager	26	0	13		
Voc Rehab Counselor	88	2	22		
Voc Rehab Counselor Certified	48	2	12		

Voc Rehab Program Instructor I	13	0	3
Voc Rehab Program Instructor II	6	0	1
Voc Rehab Program Specialist I	20	0	5
Voc Rehab Program Specialist II	30	4	7
Voc Rehab Specialist - Certified	10	1	2

The above table represents all categories of currently employed staff. Certified employees have professional certifications in the respective personnel categories. There are 48 Certified Vocational Rehabilitation Counselors. The remaining 88 counselors meet Qualified Rehabilitation Counselor standards. In addition, VR Program Specialists Certified and some administrative staff are also Certified Rehabilitation Counselors. One of the Bioptic Driving Instructors holds their Certified Driver Rehabilitation Specialist Certification as well as a Certified Rehabilitation Counselor Certification. The specialist series house our Employment Specialists, Rehabilitation Technology Specialists, Independent Living and Older Blind Specialists, and other professional specialties that require specific expertise to perform the functions of their job.

D. RATIO OF QUALIFIED VR COUNSELORS TO CLIENTS:

Kentucky OVR employed 136 qualified vocational rehabilitation counselors for this reporting period and had 42,042/136 active consumer cases for a 335 ratio of clients to counselors. This number includes potentially eligible cases in the amount of 15,568 so in removing that number it becomes 29,361/136 with a ratio of 219 client to counselor.

E. PROJECTED NUMBER OF INDIVIDUALS TO BE SERVED IN 5 YEARS:

Based on the latest estimated population for Kentucky from the U.S. Census Bureau, the National Center on Birth Defects and Developmental disabilities estimate of Kentucky adults in relation to the population, the 2021 Annual Disability Statistics Compendium population of Kentucky growth from 2017 – 2021 and agency consumer growth from 2022 – 2023, the projected number of consumers to be served in PY 2028 is 47,015.

2. DATA AND INFORMATION ON PERSONNEL PREPARATION AND DEVELOPMENT, RECRUITMENT AND RETENTION, AND STAFF DEVELOPMENT, INCLUDING THE FOLLOWING:

A. A LIST OF THE INSTITUTIONS OF HIGHER EDUCATION IN THE STATE THAT ARE PREPARING VR PROFESSIONALS, BY TYPE OF PROGRAM; THE NUMBER OF STUDENTS ENROLLED AT EACH OF THOSE INSTITUTIONS, BROKEN DOWN BY TYPE OF PROGRAM; AND 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.

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Institute of Higher Education	Type of Program	No. of Students Enrolled	No. of Prior Year Graduates
University of Kentucky	Master of Counseling with a Clinical Mental Health Counseling (CMHC) or Rehabilitation Counseling (RC) Track	65 (43 in CMHC and 22 in RC)	18 (13 in CHMC and 5 in RC)

B. THE VR AGENCY’S PLAN FOR RECRUITMENT, PREPARATION AND RETENTION OF QUALIFIED PERSONNEL, WHICH ADDRESSES THE CURRENT AND PROJECTED NEEDS FOR QUALIFIED PERSONNEL; AND THE COORDINATION AND FACILITATION OF EFFORTS BETWEEN THE VR AGENCY 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.

Recruitment for state government positions is coordinated through the Commonwealth of Kentucky Personnel Cabinet. The Cabinet advertises available positions on their website and shares the information with LinkedIn. In addition, all advertisements are shared statewide on the agency KYOVR listserv for those that may be interested in advancement opportunities or would like to share the information with others outside of the agency that may be interested in applying, including agency consumers.

In addition to the University of Kentucky Master of Counseling program, the agency also offers internship opportunities to other collegiate programs within the state that support degree programs in social work, when staff are available to supervise. With the ever-growing number of new hires from this related degree program, the agency is making efforts to provide exposure to our programs through additional university connections and fieldwork opportunities.

Retention efforts have been assisted through internal raises that took place in 2022, and additional raises provided by the Governor in 2022, 2023, 2024 and 2025. Kentucky Personnel Cabinet at the direction of the General Assembly completed a review of all personnel categories to ensure the accuracy of classification descriptions, examine all starting and midpoint salaries and to ensure that based on the education and experience required for a position it is assigned to the correct grade. A recent regulation from state personnel provides a formula to help mitigate the hiring of a new employee into a salary that surpasses coworkers in the same agency, job classification, with like education and experience, and residing in the same county. (101 KAR 2:034(1)(3))

There is compression of salary issues that have been identified that impact leadership positions. Kentucky Personnel is aware and has enacted some measures to address this, such as ensuring that supervisors are at least 5% above in salary from those they are supervising. This does not fully address the issue and leadership succession is significantly impacted by the decrease in benefits associated with taking on higher level responsibilities.

In addition to agency pay rates and to assist with leadership succession, the Education and Labor Cabinet now provides access to an Emerging Leaders Program that staff can apply to participate in for career development. The preparation for leadership succession is important and the training provided at the Cabinet level provides a higher-level overview of the services throughout state government. In the prior session there were four agency participants that successfully completed the program and currently there are two agency staff participating in this initiative.

The agency currently utilizes contract employees to provide additional supports for service delivery. This resource is used to supplement temporary needs but has historically been utilized due to the non-competitive salaries offered in the state positions for professional positions. The agency is reviewing this practice along with the current payrates of contracted professional services to determine if returning these professionals to the state system is achievable. These include such positions as interpreters and rehabilitation technologists. Professional services for mental health counselors, psychiatrists, and psychologists are and will be contracted through universities for services as needed. Temporary staff will continue to be utilized in high turnover positions such as cooks and second and third shift employees at our centers.

The Governor's Emerging Leader program assists in recruitment, preparation, and retention within state agencies. A twelve-month transformational leadership development program designed to provide guidance and leadership development opportunities for all employees in the merit system. This flagship program has garnered respect and attention as a model for retaining and promoting within state government. Staff interested and eligible for this program are encouraged to apply.

C. DESCRIPTION OF STAFF DEVELOPMENT POLICIES, PROCEDURES, AND ACTIVITIES THAT ENSURE ALL PERSONNEL EMPLOYED BY THE VR AGENCY RECEIVE APPROPRIATE AND ADEQUATE TRAINING AND CONTINUING EDUCATION FOR PROFESSIONALS AND PARAPROFESSIONALS:

I. 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

II. PROCEDURES FOR THE ACQUISITION AND DISSEMINATION OF SIGNIFICANT KNOWLEDGE FROM RESEARCH AND OTHER SOURCES TO VR AGENCY PROFESSIONALS AND PARAPROFESSIONALS AND FOR PROVIDING TRAINING REGARDING THE AMENDMENTS TO THE REHABILITATION ACT MADE BY THE WORKFORCE INNOVATION AND OPPORTUNITY ACT.

The agency believes that a well-trained professional staff is essential in providing quality services to individuals with disabilities and achieving competitive integrated employment outcomes for agency consumers. Training plans are based on federal laws, RSA monitoring findings, agency strategic plan, case reviews, continuous improvement initiatives, training needs assessment, consumer need assessment staff and public forums.

The agency utilizes both in-person and online resources for training from internal and external sources. Onboarding for the State of Kentucky, the Cabinet and KYOVR now includes web-based trainings offering more timely engagement. All 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.

Skills Enhancement Training (SET) is the agency's new employee orientation program. A new format has been developed to ensure that staff receive the two-week training required within the first 6 months of employment. This training occurs at least 4 times during the calendar year or as often as needed to accommodate new hires. Agenda items include Laws and Regulations, Organizational Structure, Specific Disabilities, Pre-Employment Training Services/Transition, Case Management, Referral and Application, Social Security, Eligibility, Follow Up and Case Closure, IPE's, Kentucky Business Enterprise Program, Diversity, Cost Sharing, Employer Services, Assistive Technology, Mental Health Issues, Visual Impairments, Deaf and Hard of Hearing Services, Kentucky Retaining Employment and Talent after Injury/Illness Network Retain (KY RETAIN), Engagement and information on both of the centers. To further enhance the new employee knowledge of the agency, two (2) of the sessions are held at the centers to showcase their programs for consumers and provide new staff with a tour of the facility. With the reformatting of SET, participants that completed the orientation training five (5) or more years ago are encouraged to attend the training again. Future plans are to require this "Re-Setting" at a minimum of every (5) years. Upon completion of the training the agency sends out an assessment survey to evaluate the training provided. Plans are moving forward to include a repeat assessment survey after 6 months to evaluate the usefulness of the training provided in their daily job duties.

New employees are also required to take a recently updated online training on the Client Assistance Program (CAP) developed in 2023 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.

In April 2023 the agency conducted an assistant training focusing on the duties and responsibilities of the staff that provide support to the counselors and other agency other staff. In May 2024 the agency conducted a statewide training for all employees providing 3 days of in-person presentations and workshops. Topics included Employment First: What it Means, Why it Matters and VR's Role in it, CMS/SARA, Sound Fiscal Management, Customer Service, Case Review Process, Guidance and Counseling Tools for Counselor When Working with Consumers with Hearing Loss, ADA and Substance Abuse, The Assistant's Role in Consumer Success, Conflict Management, Statewide Substance Use Services & Supports, Executive Functioning, Emotions, and Other Impairments in Adults with ADHD, Supporting Autistic Workers and Job Seekers, Building intrinsic motivation, and Cyber Security, Sexual Predators Online, Social Media Safety.

The agency Counselor Mentor Program has grown into a nationally recognized program. The mentors from this program have provided training and guidance to new counselors since being implemented in June 2002. Currently, there are 21 counselors involved The Counselor Mentor Leadership Team oversees all aspects of this program including policies, procedures, recruitment, training materials, and the annual mentor training program. The Counselor Mentor Leadership Team consists of an administrator from central office, two field managers (one representing services to the blind and the other representing all other disability services), and counselor mentors, who have been awarded the Mentor of the Year award in the past and have substantial mentoring experience. Currently, there are 21 mentors involved in 11 out of the 20 districts represented within the mentoring program.

Mentors are voluntary and receive no additional pay for their services. They are required to undergo additional training to maintain mentor credentials. Development of the skills and knowledge required to perform this specific role provides an opportunity for the mentor to build their resume and prepare to assume other leadership roles within the agency. There are 17 former participants who are now serving in leadership roles. In July 2025, the agency was approved to restructure and added a Training Branch to the organizational unit. Two existing employees were moved to this branch based on their job responsibilities and one individual is designated as the training contact for the Counselor Mentor Team to ensure they are receiving a the most current knowledge of vocational rehabilitation services that equips them to provide individualized orientation to new counselors.

The minimum eligibility requirements for a counselor to apply to the Counselor Mentor Program are as follows: an applicant must have a bachelor's degree in a field of study reasonably related to Vocational Rehabilitation, such as Vocational Rehabilitation counseling, social work, psychology, disability studies, business administration, human resources, special education, supported employment, customized employment, and economics. Certified Rehabilitation Counselor (CRC) applicants must also have three (3) years of experience as a Vocational Rehabilitation Counselor, a Rehabilitation Counselor for the Blind (RCB), or a Rehabilitation Counselor for the Deaf (RCD) for the state of Kentucky and submit a recommendation. If applicants are not CRCs, they must have 5 years of experience. Applicants must

complete an application regarding their reasons for applying to the mentor program and submit a case number completed within the last two program years that is available in the Case Management System (CMS). This case should reflect their best casework and the provision of guidance and counseling. The Counselor Mentor Leadership Team reviews the application to determine if the deadline for submission was met and all appropriate documents for the application were provided, The Counselor Mentor Leadership Team conducts an interview with the applicant to determine program admission. If the applicant is accepted and approved, the applicant attends an orientation that contains an overview of the mentor guide. All mentors are required to attend annual training designed by the Counselor Mentor Leadership Team to hone their skills and knowledge for the mentoring process. The pandemic and salary discrepancies are variables that have impacted our ability to provide consequential data regarding the formal mentoring process on retention and improved competitive integrated employment outcomes. Office of Vocational Rehabilitation (OVR) leadership has charged the mentoring team to refocus their review to include updated data tracking of the impact of this program on the areas identified.

Since 2020, the agency has participated in the Center for Innovative Training in Vocational Rehabilitation (CIT-VR), an RSA five-year grant through George Washington University. This exceptional opportunity afforded the agency with early access to training programs in online formats for advancement of knowledge and increased onboarding materials. The Counselor Mentor Team worked with San Diego State University as a part of the CIT-VR grant to develop Kentucky Specific training for new counselors. The grant ended this year but was a very successful addition to the KYOVR training program resources.

Due to the benefit and success of the YesLMS use during the CIT-VR grant, the agency contracted for access to this resource for all agency staff. We find that this system is not only helpful to new employees but also allows the agency to offer advanced training opportunities from national resources to all staff to broaden their 21st century knowledge of workforce innovations, systems and professional advancements.

The Carl D Perkins Vocational Training Center (CDPVTC) Commission on Accreditation of Rehabilitation Facilities (CARP) certified which requires their employees to take training for certification compliance. These trainings include Ethics and code of conduct, Education to stay current in the field, Education to reduce identified physical risks, Health and safety, Infectious diseases, Transportation safety, Onboarding (only new employees), Workforce development activities, Cybersecurity / HIPPA, Performance measurement (only new, managers staff), Use of positive interventions (student behavior), and Disability Awareness. The trainings offered online are a tremendous supplemental support for training offered onsite at the center.

Professional continuing education credits for assistive technology professionals occurs annually when the agency partners with the Kentucky Assistive Technology System (KATS) Network and Protection and Advocacy to coordinate a statewide training. The presentation titles include Exploring Everyday Applications of Generative Artificial Intelligence, Phonak: A Solution for Every Need, App Smackdown, What's New in AT for People Who Are Visually Impaired?, AT for Deafblind Youth and

Adults: Helen Keller National Center, DHHS Services: A Branch Overview and Common Assistive Technology Options for Consumers with Hearing Loss, and Universal Design for Learning for All, Empowering Inclusivity: Creating Accessible Presentations with Microsoft PowerPoint, The Summer Assistive Technology Workshops are attended by KYOVR staff, AT professionals, educators, Occupational Therapists, Physical Therapists, and other professionals that have in interest in or contact with AT. KYOVR administers the KATS Network, the Commonwealth's Assistive Technology program. Rehabilitation Engineering and Assistive Technology Society of North America (RESNA) continuing education credits were offered as part of the training to ensure that all agency rehabilitation technology staff maintain the required credits for continuance of their professional certification.

The agency also encourages staff to utilize the training offered through other entities within and outside of state government. This type of information is disseminated via email to all staff. One partner in this endeavor is the University of Kentucky Human Development Institute (UKHDI) from the University of Kentucky. Employees also utilize the webinar series topics offered by UKHDI during a spring, summer and fall training program. Topics for 2025 included: Improving Transition Outcomes for Youth with Disabilities, Relationships and Dating for People with Disabilities, and a Panel of Kentucky LEND Self-Advocate Trainees.

College and university level classes are highly encouraged for staff though the agency does not provide educational assistance currently. Obtaining an education degree may result in a reclassification if the reclassification also includes an increase in material duties assumed by the employee. The agency shares information with staff regarding formal educational training such as the Master of Rehabilitation Counselor degree. Included in the information are details about scholarships and grants that may be available to assist with educational expenses.

Agency staff are encouraged to participate in the Leadership Conference hosted by the Kentucky Personnel Cabinet. The most recent training took place in September 2024. As with many other conferences, this one took place in a virtual format which created a positive outcome of more employees participating in the event. The event's agenda focused on Accessibility and Assistive Technology, Mental Health, Artificial Intelligence (AI), Productivity and Execution, and Panelist Expertise.

Information regarding research and training pertinent to all vocational rehabilitation professionals and paraprofessionals is disseminated via email to all staff. In addition, the Training Branch is responsible for training, maintains a calendar of all training that has been disseminated along with a folder in a shared drive for all staff that contains a copy of all announcements that have been distributed along with any supporting documentation. Resources that have been shared throughout 2024 are from the following sources: National Institute on Disability, Independent Living, and Rehabilitation Research (NIDILRR), Rehabilitation Services Administration (RSA), Vocational Rehabilitation Technical Assistance Center (VRTAC), National Technical Assistance Center on Transition: The Collaborative (NTACT:C), Workforce GPS, Office of Special Education Programs (OSEP), Office of Disability Employment Policy (ODEP), and the University of Kentucky Human Development Institute (HDI).

KYOVR makes every effort to have representation at and participate in national, regional, and state training events. In 2024 KYOVR staff represented the agency at the following conferences: Kentucky Rehabilitation Association Annual Conference, Kentucky Association of People Supporting Employment first Conference, Kentucky Individual Placement and Support Conference, Assistive Technology Workshop, Kentucky Governor's Conference on Leadership, Sagebrush Conference for Randolph-Sheppard, Council of State Administrator of Vocational Rehabilitation, National Council of State Agencies for the Blind, National Federal for the Blind, American Federation for the Blind, VR Technical Assistance Webinars, and Southeast Rehabilitation Institute on Deafness. Additionally, we have staff participate in the National Rehabilitation Leadership Institute to provide them with additional knowledge to share with staff based on shared ideas that they learn within the program. In addition, a supported employment staff person was invited to the National Customized Employment Symposium in Denver, Colorado this year. The program goal was to "advance Customized Employment (CE) as evidence backed practice to expand Competitive Integrated Employment (CIE).

The agency provides training opportunities to address identified needs from the respective supervisors or as determined based on case review processes and advancements in the field of rehabilitation. Staff are supported in attending associational meetings for the rehabilitation professions such as Kentucky Rehabilitation Association and Association for Persons for Supporting Employment 1st. Presentation titles included Inside Employees' Minds: Key Insights for Engagement and Culture, Another Way into the Workforce: Developing Employer Partnerships with Homeless Outreach Services The Governor's Council of Second Chance Employers, Decoding the Emerging Workforce: Navigating the Future of Employee Retention and Engagement, An Emerging Challenge: Work as a Social Determinant of Health, Ready for Industry: Complimentary Training Tool for the Key Sectors of Manufacturing, Healthcare, IT, Transportation, Logistics, Architecture and Construction, Building Effective School-Business Partnerships to Strengthen Kentucky's Workforce, Trust Catalyst: The Formula for Creating a Culture of Psychological Safety, Leading With Care: An Introduction to Trauma-Informed Leadership, Beyond Treatment: How Kentucky Recovery Vocational Combines Workforce Training and Recovery Support for Lasting Change, Empowering Communities: How Top Employers Drive Workforce Development and Engagement, Building Kentucky's Workforce through Public Private Partnerships and Solving the Teacher Shortage: Leveraging Apprenticeships to Create a Resilient and Inclusive Pathway to Teaching, and Registered Apprenticeship: A Proven Return on Investment.

The agency develops opportunities to engage with partners on training regarding Pre-Employment Transition Services (Pre-ETS). In 2025 the agency hosted a second annual Pre-ETS Summit tailored to the needs of those working with schools. The invitations for the Summit went to schoolboard members, school superintendents, counselors and other professionals. The agency worked collaboratively with the National Technical Assistance Center for Transition as well as Kentucky Department of Education Staff to develop the agenda and provide opportunities for students to relay their success stories. The reviews from participants and attendees overwhelmingly provided positive feedback on relevance of topics, clarity of information, the amount of content, engagement of presenters and the likelihood of their participation if another event is offered. Agenda topics for 2025 included: Pre-Employment Transition

Services, CWTP, CRP & Pre-ETS Providers, Project SEARCH, JAG, and Student Summer Work-Based Learning Experience.

3. DESCRIPTION OF VR AGENCY POLICIES AND PROCEDURES FOR THE ESTABLISHMENT AND MAINTENANCE OF PERSONNEL STANDARDS CONSISTENT WITH SECTION 101(A)(7)(B) TO ENSURE THAT VR AGENCY 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

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.

The KYOVR defines a “Qualified Vocational Rehabilitation Counselor” as one who meets the following criteria, based on the Kentucky Personnel Classification for vocational rehabilitation counselor positions.

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 for a Vocational Rehabilitation Counselor. This position requires the individual to be a graduate of a college or university with a master's degree in rehabilitation, rehabilitation teaching or therapy, guidance and/or counseling, psychology, sociology, orientation and mobility, social work, special education, education with emphasis in vocational counseling, disability studies, behavioral science, human services, vocational assessment, addiction counseling, or a related field. There is a substitution clause that allows for a bachelor's degree plus two years of professional experience in rehabilitation, rehabilitation counseling, rehabilitation teaching or therapy, vocational assessment, employer relations, rehabilitation technology, vocational evaluation, supported employment, job placement, guidance and/or counseling, psychology, sociology, orientation and mobility, social work, special education, education with an emphasis in vocational counseling, customized employment, health studies, human relations/resources, addiction studies, occupational therapy, physical therapy, school counseling or a related field will substitute for the required master's degree.

Based on the above criteria of Vocational Rehab Counselor, all employed vocational rehabilitation counselors meet or exceed the criteria.

The qualifying certification for the certified position is the Certified Rehabilitation Counselor (CRC).

Managers for vocational rehabilitation counselor positions are required to meet the minimum qualification for their position and are encouraged to obtain their CRC. Currently 84% of our VR counselor managers are also Certified Rehabilitation Counselors.

Certifications required for professional and para-professional positions are supported by the agency through continuing education opportunities provided in-house as well as other pertinent local, state, and national level training. A broader access to national training is now achieved with the implementation of online training initiatives through a variety of resources. Staff with a desire to achieve a certification in their profession are supported in the preparation phase of their efforts and with examination fee support on a onetime pass or fail basis.

Primary certifications currently utilized within KYOVR are as follows:

- Certified Rehabilitation Counseling (CRCC/CRC)
- Assistive Technology Professional (ATP/RESNA),
- Certified Interpreters or Registry for Interpreters for the Deaf (RID)
- Certified Driver Rehabilitation Specialist (CDRS)

The agency also has need of professionals to fulfill medical and specialized services provided at Carl D. Perkins Vocational Training Center 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
- Nursing Staff

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

The subject matter experts in coordination with the Training Branch staff consistently share virtual and in-person training opportunities and maintain a calendar of all the events for easy information access for staff. Professional and paraprofessional positions are provided with supports necessary to maintain their required continuing education for their respective fields and the agency provides financial assistance for the maintenance of required professional certifications. The training team ensures that all courses developed internally provide associated professional certification for continuing education hours. Individuals seeking their credentials in their profession are supported through examination fees and are considered for reclassifications as appropriate based on their academic and professional certification changes.

Online training options are provided through the YesLMS system library and has titles available on various topics that can provide staff with a better understanding of the evolving labor force and the needs of individuals with disabilities. The inclusion of these national training courses in the system broadens 21st century knowledge and awareness on a national level for our agency staff.

4. METHOD(S) THE VR AGENCY USES TO ENSURE THAT PERSONNEL 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.

The agency is committed to established practices that ensure that staff is trained and knowledgeable of resources to assure consumers receive the appropriate communication resources to fully participate in agency processes and programs. Consumers in need of interpreting or communication assistance services have resources provided as part of their vocational rehabilitation process.

The agency 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 Commonwealth of Kentucky Personnel Cabinet through their online job's portal. Classifications for these positions specifically outline the necessary skills required to fill the position.

Supporting the development of additional resources for communication is also part of the agency processes. Specifically, the Deaf and Hard of Hearing Services Branch actively provides internship and volunteer opportunities for students graduating from the American Sign Language (ASL) program at Eastern Kentucky University and those graduates that need training hours for their certification. 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.

5. 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.

The KYOVR agency coordinates its CSPD plan to ensure the standards and qualifications of our personnel coordinate 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 KYOVR 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. KYOVR staff attend Community Work Transition training offered by the University of Kentucky's Human Development Institute (HDI). Rehabilitation counselors work collaboratively with high school education teachers, local directors of special education, and Employment Specialists for students transitioning from high school into employment. KYOVR Counselors attend Individual Education Plan (IEP) and Admissions and Release Committee (ARC) meetings working with the team in establishing a vocational goal. This assures the development of the students IEP in conjunction with the vocational rehabilitation Individualized Plan for Employment (IPE). KYOVR provides support to teaching instructors, school staff and Employment Specialists regarding rehabilitation issues and other areas of agency staff expertise such as Assistive Technology to ensure successful placements. Often rural schools do not have the needed resources; therefore, KYOVR staff offer their expertise based on the individual needs of the student working closely with all staff involved with IDEA.

Furthermore, the Education and Labor Cabinet maintains a Council called the "Workplace Engagement Network." The Network's existence provides an avenue to recruit, retain, and support wide array of VR professionals. The mission and vision statements are highlighted below.

Mission: The Education and Labor Cabinet's "WE Network" cultivates a culture of engagement by embracing our strengths and differences through encouraging all voices to create a vibrant, collaborative, and respectful community.

Vision: We champion a welcoming and encouraging workplace through ongoing training and professional development, strategic recruitment and retention initiatives, and promoting a positive, engaged culture. We are committed to advancing growth and accessibility across all levels of the Cabinet.

The WE Network is comprised of representatives from ELC offices and agencies, including KYOVR.

J. COORDINATION WITH EDUCATION OFFICIALS.

In accordance with the requirements in Section 101(a)(11)(D) of the Rehabilitation Act—

1. DESCRIBE PLANS, POLICIES, AND PROCEDURES FOR COORDINATION BETWEEN THE DESIGNATED STATE AGENCY AND EDUCATION OFFICIALS RESPONSIBLE FOR THE PUBLIC EDUCATION OF STUDENTS WITH DISABILITIES, THAT ARE DESIGNED TO FACILITATE THE TRANSITION OF THE STUDENTS WITH DISABILITIES FROM THE RECEIPT OF EDUCATIONAL SERVICES IN SCHOOL TO THE RECEIPT OF VOCATIONAL REHABILITATION SERVICES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES.

The OVR Transition Services Branch will coordinate with education officials on a state and local level in the planning and implementation of the provision of Pre-Employment Transition Services (Pre-ETS) and Transition services to students with disabilities. The branch consists of one (1) Branch Manager, three (3) Program Administrators, one (1) Administrative Specialist, and six (6) Pre-ETS Coordinators. The Branch Manager oversees all branch activities and represents the agency on inter-agency teams. The Program Administrators coordinate and monitor Pre-ETS and Transition services throughout the state inclusive of the Community Work Transition Program, including specific contracts with service providers. The Administrative Specialist provides clerical support to the branch. The Pre-ETS Coordinators work with Potentially Eligible students in their specific regions. They collaborate directly with schools and providers to receive referrals, coordinate Pre-Employment Transition Services, and monitor the progress of Potentially Eligible students to help determine if/when it is appropriate for a student to apply for OVR services. The Pre-ETS Coordinators transfer the Potentially Eligible students' cases to VR Counselors who determine eligibility for services and develop Individualized Plans for Employment.

Branch Staff are currently working on the revision of policies and procedures for the branch. OVR staff will receive training on all policies to assure to timely implementation of service delivery and the effective coordination of services. OVR has a focus on internal controls for the areas of documentation and accurate data entry to ensure the efficacy of reporting.

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 provides the following five required pre-employment transition activities:

1. Job Exploration Counseling

2. Work Based Learning

3. Counseling Post-Secondary Opportunities

4. Workplace Readiness Training

5. Instruction in Self-Advocacy

OVR has assigned a VR Counselors and Pre-ETS Coordinator to each of Kentucky's 171 Local Education Agencies including the School for the Deaf and the School for the Blind 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 a disability, their family, and other agencies who assist students with disabilities who are in need of transition services. These counselors coordinate and authorize transition services for students with disabilities, age who are 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. OVR Pre-employment Transition Services Coordinators work in conjunction with the VR counselor in the provision of services. Pre-ETS Coordinators receive referrals from services providers, schools, students, and families for students who are Potentially Eligible for VR services. Pre-ETS Coordinators approve and monitor students Pre-ETS activities to help determine when it is appropriate for the student to apply for VR services. Service coordination activities may also include resource information about vocational rehabilitation, presentations, handouts, and staff development. The VR Counselor and Pre-ETS Coordinators collaborate 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 needed services, as reflected on the IPE. The student should have ample opportunity to participate in Pre-employment Transition Services before they graduate. The OVR Counselor along with the Pre-Employment Transition Services Coordinators 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 and transition services to students with the most significant disabilities to assist them in transitioning from high school to competitive integrated employment. Employment Specialists, 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 a contract with the Jobs for America's Graduates (JAG) to provide Pre-employment Transition 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 three of the nine special education cooperatives for the provision of Pre-employment Transition Services. Community Rehabilitation Providers may provide Pre-ETS through a Service Fee Memorandum.

Transition Services Branch staff work directly 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.

Rehabilitation Counselors for the Deaf are proficient in American Sign Language and serve individuals who are deaf and hard of hearing and use this type of communication. Rehabilitation Counselors for the Deaf are also skilled in serving people who have vision limitations in addition to a hearing loss or deafness. Individuals who are deaf and 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.

The Office of Vocational Rehabilitation also has staff trained regarding the limitations that people with hearing loss may experience. These Communication Specialists receive specialized training regarding ways to serve individuals who are hard of hearing or late deafened with auditory/oral communication. This includes training regarding Hearing Aid technology and Assistive Listening Devices.

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 Rehabilitation 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 Pre-employment Transition Services program held either through a virtual platform or 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.

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 171 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. DESCRIBE THE CURRENT STATUS AND SCOPE OF THE FORMAL INTERAGENCY AGREEMENT BETWEEN THE VR AGENCY AND THE STATE EDUCATIONAL AGENCY. CONSISTENT WITH THE REQUIREMENTS OF THE FORMAL INTERAGENCY AGREEMENT PURSUANT TO 34 C.F.R. § 361.22(B), PROVIDE, AT A MINIMUM, THE FOLLOWING INFORMATION ABOUT THE AGREEMENT:

A. CONSULTATION AND TECHNICAL ASSISTANCE, WHICH MAY BE PROVIDED USING ALTERNATIVE MEANS FOR MEETING PARTICIPATION (SUCH AS VIDEO CONFERENCES AND CONFERENCE CALLS), TO ASSIST EDUCATIONAL AGENCIES IN PLANNING FOR THE TRANSITION OF STUDENTS WITH DISABILITIES FROM SCHOOL TO POST-SCHOOL ACTIVITIES, INCLUDING PRE-EMPLOYMENT TRANSITION SERVICES AND OTHER VOCATIONAL REHABILITATION SERVICES;

B. TRANSITION PLANNING BY PERSONNEL OF THE DESIGNATED STATE AGENCY AND EDUCATIONAL AGENCY PERSONNEL FOR STUDENTS WITH DISABILITIES THAT FACILITATES THE DEVELOPMENT AND IMPLEMENTATION OF THEIR INDIVIDUALIZED EDUCATION PROGRAMS (IEPS) UNDER SECTION 614(D) OF THE INDIVIDUALS WITH DISABILITIES EDUCATION ACT;

C. THE ROLES AND RESPONSIBILITIES, INCLUDING FINANCIAL RESPONSIBILITIES, OF EACH AGENCY, INCLUDING PROVISIONS FOR DETERMINING STATE LEAD AGENCIES AND QUALIFIED PERSONNEL RESPONSIBLE FOR TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES;

D. PROCEDURES FOR OUTREACH TO AND IDENTIFICATION OF STUDENTS WITH DISABILITIES WHO NEED TRANSITION SERVICES AND PRE-EMPLOYMENT TRANSITION SERVICES. OUTREACH TO THESE STUDENTS SHOULD OCCUR AS EARLY AS POSSIBLE

DURING THE TRANSITION PLANNING PROCESS AND MUST INCLUDE, AT A MINIMUM, A DESCRIPTION OF THE PURPOSE OF THE VOCATIONAL REHABILITATION PROGRAM, ELIGIBILITY REQUIREMENTS, APPLICATION PROCEDURES, AND SCOPE OF SERVICES THAT MAY BE PROVIDED TO ELIGIBLE INDIVIDUALS;

E. COORDINATION NECESSARY TO SATISFY DOCUMENTATION REQUIREMENTS SET FORTH IN 34 C.F.R. PART 397 REGARDING STUDENTS AND YOUTH WITH DISABILITIES WHO ARE SEEKING SUBMINIMUM WAGE EMPLOYMENT; AND

F. ASSURANCE THAT, IN ACCORDANCE WITH 34 C.F.R. § 397.31, NEITHER THE SEA NOR THE LOCAL EDUCATIONAL AGENCY WILL ENTER INTO A CONTRACT OR OTHER ARRANGEMENT WITH AN ENTITY, AS DEFINED IN 34 C.F.R. § 397.5(D), FOR THE PURPOSE OF OPERATING A PROGRAM UNDER WHICH YOUTH WITH A DISABILITY IS ENGAGED IN WORK COMPENSATED AT A SUBMINIMUM WAGE.

A. Consultation and technical assistance, which may be provided using alternative means for meeting participation (such as video conferences and conference calls), to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including pre-employment transition services and other vocational rehabilitation services;

The Kentucky Office of Vocational Rehabilitation has a current Memorandum of Understanding with the Kentucky Department of Education and is renewed every 3 years. Within this agreement are strategies for the two agencies to work collaboratively in evaluating, serving, and planning for a seamless transition from school for students with disabilities who are eligible or potentially eligible for Vocational Rehabilitation (VR) services. The intended result of these collaborative strategies and activities is that students will achieve their post-secondary goals as they make the transition from school to adult education, competitive integrated employment (including customized employment and supported employment), continuing and adult education, independent living, and community participation. Signed agreements are in place with the local educational agencies. These agreements are updated annually, and they outline and identify the responsibilities of each party for the provision of services. 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 receives ongoing technical assistance from the National Technical Assistance Center on Transition for the area of pre – employment transitions services. NTACT staff provide guidance to ensure 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 NTACT 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. Contractual agreements are in place so that OVR has more involvement in the approval of services for students with disabilities. 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. OVR is currently in the process implementing a new case management system.

The Office participates with the Kentucky Department of Education (KDE) and 21 other state agencies on the Kentucky Interagency Transition Council (KITC) in the coordination among agencies in the delivery of transition services. OVR Transition Services Branch staff are members of KITC and participate in quarterly council meetings. OVR provides ongoing technical assistance to providers of transition services and pre-employment transitions services. OVR and KDE each have staff serving as team leaders on a subcommittee of KITC that meets monthly to work towards improving transition services throughout Kentucky.

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. The monthly SIAC meetings give OVR the opportunity to collaborate, plan and develop on going partnerships with other state agency representatives who serve mutual individuals with disabilities. KDE also has representation on the SIAC.

Regional OVR representation has been established for the Regional Interagency Councils (RIAC) for the system of care to have consistent OVR representation. There is a total of 18 RIAC's across the commonwealth. 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 a spectrum of effective, community-based services and supports for children and transition-age youth, with at-risk behavioral health needs or other challenges, and their families that: are organized into a coordinated network; builds meaningful partnerships with families and youth and addresses their cultural and linguistic needs in order to help them function better at home, in school, in the community, and throughout life.

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 continues its work in 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, and the programs with these partners are frequently reviewed to improve the quality of these services.

B. Transition planning by personnel of the designated State agency and educational agency personnel for students with disabilities that facilitates the development and implementation of their individualized education programs (IEPs) under section 614(d) of the Individuals with Disabilities Education Act;

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 8th 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). The Memorandum of Understanding between OVR and KDE outlines general responsibilities of both parties related to transition planning for students with disabilities through the provision of information and technical assistance to local education agencies.

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 save the VR counselor considerable time and effort, but it also 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 students' 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.

C. The roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services and pre-employment transition services;

The Memorandum of Understanding between OVR and KDE clearly states that each entity is, "financially responsible for the services they provide under their own laws and rules."

Additionally, 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 memorandums 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 job exploration counseling, work-based learning experiences, counseling on post-secondary education, workplace readiness training and instruction in self-advocacy.

D. Procedures for outreach to and identification of students with disabilities who need transition services and pre-employment transition services. Outreach to these students should occur as early as possible during the transition planning process and must include, at a minimum, a description of the purpose of the vocational rehabilitation program, eligibility requirements, application procedures, and scope of services that may be provided to eligible individuals;

Outreach and involvement of the VR agency begins at age 14. OVR assigns VR Counselors to each school district to provide information regarding transition services, including Pre-employment Transition Services, and to accept referrals of students with disabilities. Local Education Agencies provide lists of students with Individualized Education Plans (IEP) and 504 Plans to VR staff and/or service providers. VR Staff or providers contact these students to encourage participation in transition services, including Pre-employment Transition Services.

OVR obtains a list of the number of students between the ages of 14 and 21 per county that are accessing modified instructional materials due to their visual disability. Rehabilitation Counselors for the Blind receive information regarding the number of students that receive these materials to help identify where unserved students are located in the school districts. Staff conduct outreach to school staff, inclusive of Teachers of the Visually impaired to strengthen partnerships and increase awareness of available services. This includes pre-employment transition services.

The CWTP is designed to provide pre-employment transition and transition services to all students with significant disabilities to assist in transitioning from high school to competitive integrated employment. Employment Specialists, funded by the local education agency, refer students to OVR for services.

Should the student need individualized transition services during this time, OVR counselors work with the Employment Specialists 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 Jobs for America's Graduates (JAG) and three of the Special Education Cooperatives for pre-employment transition services. Additionally, local Community Rehabilitation Providers who provide Pre-employment Transition Services through a Service Fee Memorandum, also provide outreach to students in local schools.

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 barriers to success. The curriculum will include career development, job attainment, job survival, basic skills, leadership and self-development, personal skill, life survival skills, and workplace and economic empowerment. The JAG KY curriculum will also include presentations by local VR staff to encourage students to apply for OVR services. JAG KY employs and certify 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.

- Central Kentucky Educational Cooperative (CKEC)
- Green River Regional Educational Cooperative (GRREC)
- Greater Louisville Education Cooperative (GLEC)
- Kentucky Educational Development Corporation (KEDC)
- Kentucky Valley Educational Cooperative (KVEC)
- Northern Kentucky Cooperative for Educational Services (NKCES)

- Ohio Valley Educational Cooperative (OVEC)
- Southeast/Southcentral Education Cooperative (SESC)
- West Kentucky Educational Cooperative (WKEC)

The Kentucky Educational Cooperatives and Community Rehabilitation Programs (CRP) provide Pre-employment Transition Services on a Fee Schedule in groups or to individual students. Proposals for the provision of pre-employment services are submitted to the OVR Transition Services Branch. CRP programs may 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-employment Transition Services.

E. Coordination necessary to satisfy documentation requirements set forth in 34 CFR part 397 regarding students and youth with disabilities who are seeking subminimum wage employment; and

The Memorandum of Understanding between OVR and KDE references Section 511 of the Workforce Innovation and Opportunities Act (WIOA) which requires OVR to perform certain actions prior to an employer paying an individual a wage that is below the standard minimum wage (subminimum wage).

OVR ensures that all OVR staff are trained to understand the process that a youth (24 or under) with a disability must complete prior to entering a subminimum wage employment:

1. Youth must be determined eligible.
2. Youth must have an approved Individualized Plan for Employment.
3. Youth must have worked toward their vocational goal for a reasonable amount of time with appropriate supports, without success and have their OVR case closed.
4. Pre-employment transition services and/or Transition services, supported employment and/or customized employment are provided as appropriate.
5. Career Counseling is provided and information regarding resources and other available programs in support of competitive integrated employment.

OVR provides subminimum wage facilities within the Commonwealth 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, per Federal requirement.
- Offer multiple Pre-Employment Transition Services (Pre-ETS) opportunities for youth with a disability to ensure that this WIOA mandate is met.

- Provides individuals with available resources in their community to help with services for obtaining employment and support.

OVR continues to:

- Monitor and provide technical assistance to subminimum wage facilities to ensure WIOA requirements are met.
- Retain records on all individuals that receive Career Counseling.
- Provide individuals during first year, Career Counseling twice.
- Provide individuals during subsequent years, Career Counseling annually.

F. Assurance that, in accordance with 34 CFR 397.31, neither the SEA nor the local educational agency will enter into a contract or other arrangement with an entity, as defined in 34 CFR 397.5(d), for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.

The OVR will not enter into a contract or other arrangement with an entity as defined in 34 CFR 397.5(d) for the purpose of operating a program under which youth with a disability is engaged in work compensated at a subminimum wage.

K. COORDINATION WITH EMPLOYERS

In accordance with the requirements in Section 101(a)(11)(E) of the Rehabilitation Act, describe how the VR agency will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of VR services; and transition services for youth and students with disabilities, including pre-employment transition services for students with disabilities.

Vocational Rehabilitation Services

The Department of Workforce Development (DWD) in partnership with local and state workforce organizations are 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 Industry and Apprenticeship Services (OIAS).

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 Labor Development Cabinet (ELC)

Kentucky Cabinet for Economic Development (CED)

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 the following 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; and

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 expanding direct employer interaction statewide.

OVR employs fifteen 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 and other business-related groups; and 5) no cost accessibility surveys to employers. Job placement specialists utilize the targeted industry sectors, as determined by their local workforce region, in order to provide specific labor market information to consumers, employers and agency partners.

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 Council of State Administrators of Vocational Rehabilitation (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 positioned to provide valuable services to 503 Federal Contractors with utilization goals of 7% of their workforce, employees with disabilities. DWD 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.

The Statewide Council for Vocational Rehabilitation (SCVR), Kentucky's State Rehabilitation Council (SRC), and the Employment First Council include several employers and a representative of the Kentucky Workforce Innovation Board (KWIB) who provide important input on agency policy and activities related to employment. The SCVR presents the Employer Recognition Award annually to employers who work closely with the OVR and who make the hiring of persons with disabilities a priority. OVR 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 participates in Project SEARCH, the immersive job experience program for transition-aged students with disabilities. OVR's Statewide Coordinator for Project Search identifies and collaborates with employers throughout the state to introduce and promote the program designed to provide transition-age students an on-site working and learning experience. Currently, there are four major employers involved in Project Search Programs: University of Kentucky Healthcare in Lexington, Northern Kentucky University in Highland Heights, ABB Optical in Florence and Baptist Health Hospital in Elizabethtown. OVR develops relationships with employers to provide transition-age students the opportunity to explore career paths and identify opportunities that lead to competitive integrated employment after completion of the program. Transition-age students have received instruction for entry level jobs and training in high-demand career fields specific to area, such as central sterile, research and manufacturing. OVR's Statewide Coordinator continues to develop local partnerships with employers and schools to create a coalition of support for assisting transition-age students in developing, building and identifying career opportunities.

OVR will continue to partner with local initiatives like Project SEARCH in Northern Kentucky and the Coalition Advisory groups across the state to identify and educate employers willing to develop new programs specifically designed to focus on hiring and training individuals with disabilities.

The Kentucky Statewide Workforce and Talent Team (SWATT) is a collaborative approach focused on improving how workforce partners measure, coordinate and deliver services to Kentucky employers. The state partners driving this effort are the Cabinet for Economic Development, Education and Labor Cabinet, Kentucky Community & Technical College System and Council on Postsecondary Education. Other supporting Kentucky organizations include the Department of Education, Goodwill, KYSTATS, Kentucky Association of Manufacturers and Kentucky Hospital Association.

As a part of the Department of Workforce Development, OVR's Employer Services Branch is committed to being an active partner in this work by expanding outreach to businesses, strengthening communication and increasing responsiveness across all agencies involved. This collaboration will help increase workforce participation, support business growth and create meaningful job opportunities for the individuals OVR serves. Employer Services Branch staff attended the first five SWATT roadshows and will participate in the remaining five in the coming months. Dedicated staff participate in regular

meetings in each workforce area. OVR is excited to support a more effective and efficient system that benefits employers and Kentuckians with disabilities through stronger alignment and communication.

Transition Services for youth with disabilities and students with disabilities, including pre-employment transition services.

OVR currently has innovative programs that provide high school students 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. A diverse array of partnerships is needed in order to market the benefits of earn and learn opportunities including registered apprenticeships to Kentucky businesses for individuals with disabilities, including youth and students with disabilities. OVR will work with its existing partners among workforce, economic development, education and business entities to foster work-based learning opportunities. OVR has contractual agreements with three of the nine special education cooperatives and Jobs for American Graduates for the provision of Pre-employment Transition Services.

Kentucky's registered apprenticeship program continues to be a national model in preparing individuals for successful entry into the workforce. This administrative move builds momentum by harnessing Kentucky Education and Labor Cabinet's (ELC) existing statewide network to connect employers with potential employees and provide increased apprenticeship opportunities for Kentuckians. There are over 4,000 apprentices in Kentucky in 600+ different programs currently representing 200+ 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 Credentials of Completion to apprentices, and promoting the development of new programs through education, outreach and technical assistance.

The Community Work Transition Program (CWTP) is designed to provide pre-employment transition services and transition services to assist students with the most significant disabilities in transitioning from high school to Competitive Integrated Employment upon exiting secondary education. There is a Supported Employment Consulting fee available with the CWTP to facilitate a 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 that introduces employability skills to students with disabilities. The curriculum is specific to individuals who are blind or visually impaired. The Summer Work Experience Program is in collaboration with Community Rehabilitation Providers (CRP). 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 (KSB), 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.

L. INTERAGENCY COOPERATION WITH OTHER AGENCIES

In accordance with the requirements in Section 101(a)(11)(C) and (K), 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 to develop opportunities for community-based employment in integrated settings, to the greatest extent practicable for the following:

1. STATE PROGRAMS (DESIGNATE LEAD AGENCY(IES) AND IMPLEMENTING ENTITY(IES)) CARRIED OUT UNDER SECTION 4 OF THE ASSISTIVE TECHNOLOGY ACT OF 1998;

The Kentucky Assistive Technology Services (KATS) Network is 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 (OVR) is the lead agency for the KATS Network. The KATS Network in turn collaborates with five nonprofit organizations to operate assistive technology resource centers (ATRCs) across the state in Louisville, Lexington, Ft. Mitchell, Hazard, and Owensboro. These ATRCs provide assistive technology demonstrations, device loans, as well as accept device donations which they refurbish and redistribute to individuals in need. In addition to the ATRC collaborations, the KATS Network teams up with many other organizations to meet individual’s unique needs as well as works to connect Kentuckians to community resources. One example of this, is the Statewide Hearing Aid Reuse Program (SHARP), a program the KATS Network operates in partnership

with Starkey. Starkey repairs and refurbishes donated hearing aids to SHARP and provides those hearing aids to individuals in need at a reduced cost. Additionally, the KATS Network receives financial credit for hearing aid donations which is used to cover the cost of hearing aid repairs for Kentuckians. The KATS Network 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.

The Assistive Technology Alternative Financing Program (ATAFP) for Kentucky is the Kentucky Assistive Technology Loan Corporation (KATLC). KATLC provides financial loans for the purchase of assistive technology with its lending partner for individuals with disabilities or the parent or legal guardian of an individual with a disability. KATLC has joined with the Appalachian Assistive Technology Loan Fund (AATLF) to provide no interest, no fee loans from $100-7,000 for assistive technology to promote independence and enhanced quality of life for individuals with disabilities.

KATLC is funded by both private and public monies to assist Kentuckians with disabilities to obtain low interest loans for the purchase of assistive technology that will promote their independence and enhance their quality of life. KATLC is actively working to obtain a new lending partner to provide loans over $7,000.

2. PROGRAMS CARRIED OUT BY THE UNDER SECRETARY FOR RURAL DEVELOPMENT OF THE DEPARTMENT OF AGRICULTURE;

The USDA Rural Development makes available funding to rural communities across the Commonwealth. One of the main goals of Rural Development is to strengthen the local economies by working to improve not only small businesses but also to engage the communities surrounding the businesses.

Programs and initiatives are geared towards providing resources and building bridges of communication for rural communities. The fundamental concerns for rural areas and their communities are wrapped around access. This includes individuals who are living with a disability and their support systems.

Kentuckians with disabilities living in rural areas have further challenges. Kentucky is a primarily rural state, incorporating 54 Appalachian counties, and characterized by a high poverty rate relative to other U.S. States. (Project E3). According to 2021 Census data, Kentucky is among five states with the highest disability populations in the country making up more than 17% of the state's population. This data also explains that individuals experiencing disabilities represent over half the population in rural areas throughout the country. The geographic isolation of Kentucky's rural communities poses significant challenges for persons with disabilities in achieving competitive, integrated, and lasting employment and community participation and integration. The rural nature of Kentucky and the centralization of employment opportunities in urban areas create significant transportation and access barriers to employment opportunities. (Project E3).

An important program that will assist the broader community in rural Kentucky is the USDA Rural Developments broadband initiative. The Rural Development Innovation Center's Broadband Resources

for Rural America program addresses the digital gap in households and assists in providing internet access across these rural areas. Broadband services are important to families in rural communities for them to have access to education, training and health resources as well as connecting them to workforce opportunities.

Rural families and businesses are seeing more opportunities by the support of USDA programs, offering loans, aggressively pursuing broadband access for communities, advancing infrastructure and initiatives for both families and businesses that will benefit people's livelihood and workforce opportunities in all areas of the state. This initiative may also help with isolation experienced by people living in rural areas.

Efforts by OVR staff to provide information for these available resources to consumers continue to be made. The Assistive Technology Branch holds an Assistive Technology Conference annually for Kentucky State University's Research Farm. The 3-day conference ensures awareness of the various programs, services and resources available. At the most recent 2023 Assistive Technology Conference held in June, the following topics discussed were:

- Assistive technology and the college experience;
- Comprehensive automotive mobility solutions;
- Built-in accessibility features in windows and other software;
- Increasing independence at home with smart home technology;
- Maximizing mobility and independence;
- Mental health in the workplace; and
- Advocacy, education and empowerment for people with disabilities.

OVR Counselors are aware of programs to assist single families living in rural areas in securing a variety of loans and grants to improve their living situations, such as the single-family housing program to assist with affordable housing for individuals with low or very-low income. Agency staff provide information and referral to consumers for these programs to meet their individual needs.

3. NON-EDUCATIONAL AGENCIES SERVING OUT-OF-SCHOOL YOUTH;

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 out-of-school youth on a higher level.

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.

4. 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, when purchasing commodities or services, first preference is given to the products made by the Department of Corrections, Division of Prison Industries, as required by KRS 197.210. Second preference shall be given to any products produced by Kentucky Industries for the Blind, Incorporated, or any other nonprofit corporation that furthers the purposes of KRS Chapter 163, and agencies of individuals with severe disabilities as described in KRS 45A.465 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.

5. STATE AGENCY RESPONSIBLE FOR ADMINISTERING THE STATE MEDICAID PLAN UNDER TITLE XIX OF THE SOCIAL SECURITY ACT (42 U.S.C. 1396 ET SEQ.);

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 for 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 discussed in (6) of this section, 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.

In addition, OVR's newly established Employment First Council has representation from the Department of Medicaid Services. Most recently, through the implementation of the Department of Labor's Office of Disability Employment Policy (ODEP), the Employment First Council was chosen to participate in the National Expansion on Employment Opportunities Network (NEON). Project NEON allows agencies, including that of OVR and the Department of Medicaid Services, to review policy in order for them to align with Kentucky's definition of competitive integrated employment to propel the movement of Employment First throughout the commonwealth.

While OVR serves on numerous councils that have representation from the Department for Medicaid Services, the agency will continue to work to ensure the provision of vocational rehabilitation services and if appropriate, accommodations or auxiliary aides and services.

6. STATE AGENCY RESPONSIBLE FOR PROVIDING SERVICES FOR INDIVIDUALS WITH DEVELOPMENTAL DISABILITIES;

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.

The Office of Vocational Rehabilitation (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.

The 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 the Michelle P. Waiver. OVR 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, the HB144 Commission and, the Kentucky Judicial Commission on Mental Health, relating to persons with developmental disabilities.

Additionally, effective on July 14, 2022, legislation was passed, stating, "the General Assembly finds and declares that it is the policy of the Commonwealth of Kentucky that competitive integrated employment shall be considered the first and primary option for persons with disabilities of working age who desire to become employed." KRS 151B. 211. With the passage of the recent legislation, a new Employment First Council was established and delegated to be supported by OVR. With the formation of the Council, comes a representative from DIDD, several other key agencies, community partners, and advocates, to collaborate and address the five charges of the Council, which are:

1. Identify state policies that create disincentives for the employment of people with disabilities and develop recommendations to address and eliminate those disincentives;
2. Develop training and resources for families, self-advocates, public and private providers, and employers on the benefits of competitive integrated employment of workers with a disability;
3. Recommend the development and implementation of policies and effective practices for providers of supported employment services that increase employment opportunities for workers with a disability;
4. Utilize appropriate metrics to assess progress of efforts to increase the competitive integrated employment of workers with a disability; and
5. Submit an annual report by December 1 to the Legislative Research Commission, the secretary of the Education and Labor Cabinet, and the Governor summarizing its findings and recommendations.

OVR continues to review ways to increase interagency collaboration and support.

7. STATE AGENCY RESPONSIBLE FOR PROVIDING MENTAL HEALTH SERVICES; AND

The Department 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 challenges 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.

OVR has partnered with the DBH to implement the Individual Placement Service (IPS) Model, an evidenced based practice in Supported Employment, for consumers with serious mental illness. Currently, there are 21 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 and provide IPS services to underserved populations.

The OVR serves on numerous councils that also have representation from the DBH. In 2021, the OVR began the approval process to implement 4 Establishment Project contract opportunities with CRPs to expand IPS to unserved or underserved areas. Four providers were selected and approved, two of which were selected to provide IPS to individuals with intellectual and/or development disabilities. These contracts were approved by RSA and began in spring of 2023. It's the intent of the OVR to continue with new Establishment Projects as others phase out to continue the efforts to build capacity for IPS services throughout Kentucky.

8. OTHER FEDERAL, STATE, AND LOCAL AGENCIES AND PROGRAMS OUTSIDE THE WORKFORCE DEVELOPMENT SYSTEM.

OVR maximizes all available resources in collaboration with all partners and agencies in assisting individuals with disabilities to achieve competitive integrated employment. 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.

OVR will continue to have a collaborative relationship with agencies and entities within and outside 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. OVR has representation on the State Interagency Council (SIAC) for services and supports to Children and Transition-age Youth. 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. OVR has representation through the Kentucky Cabinet on the Commission on the Deaf and Hard of Hearing (KCDJHH). KCDJHH advisory board provides education, advocacy, and programs to eliminate barriers for deaf and hard-of-hearing Kentuckians. Also, Collaboration and coordination of services occur between OVR and the Veterans Administration Rehabilitation and Employment Programs. Veterans Administration provides rehabilitation services including vocational guidance and counseling, job development, and placement to veterans with disabilities.

OVR collaborates and coordinates services for individuals with disability within school districts, including the School for the Deaf and the School for the Blind. There are also nine special education cooperative networks across the state created to enhance educational opportunities.

As an agency, we receive and make referrals to the following agencies when needed: Department of Behavioral Health; Intellectual and Developmental Disabilities through their 14 Regional MH/IDD Boards for Supported Employment; Kentucky Drug Courts; Kentucky Cabinet for Health and Family Services; Social Security Administration; Community Rehabilitation Providers; Kentucky Association of Persons in Supporting Employment First (APSE); Department of Medicaid Services; Department of Community Based Services; Supplemental Nutrition Assistance Program (SNAP); Employment and Training (E & T) program; American Printing House for the Blind; Kentucky School for the Blind; Kentucky Federation of the Blind; and Kentucky American Council of the Blind.

We also work closely with the University of Kentucky Human Development Institute, a University Center of Excellence established by federal legislation to promote team-based approaches to provide services for individuals with disabilities and their families. OVR also works closely with The Kentucky Assistive Technology Service (KATS), which 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. In addition, the Office works in coordination with the Statewide Independent Living Council (SILC).

OVR works with 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, and Department of Disability Determination. The Client Assistance Program is available for additional assistance and advocacy during the entire rehabilitation process as well.

9. OTHER PRIVATE NONPROFIT ORGANIZATIONS.

The Office of Vocational Rehabilitation (OVR) maintains Memorandum of Agreements with providers of private, non-profit vocational rehabilitation service providers to support achievement of successful competitive integrated employment outcomes for individuals with disabilities. The OVR works with Community Rehabilitation Program providers (CRPs) through a vendor application process to ensure quality services to agency consumers.

OVR currently works with 114 CRP’s. Currently, 75 CRPs provide Employment and Retention services, another 89 provide Supported Employment services resulting in competitive integrated employment. Other agreements with private, non-profit OVR service providers will be made as necessary.

To provide services with the agency, the process is as follows:

1. The potential vendor obtains the vendor application, vendor manual, and CRP manual from the OVR website or from an OVR staff member.

2. The potential vendor reviews the Vendor and CRP Manuals to ensure the vendor is applying for appropriate services.
3. The potential vendor completes the application and provides required supplemental documentation (dependent on types of services applying for) to OVRVendors@ky.gov.
4. Central Office staff monitors the web box, and reviews submitted application and any documentation provided.
5. Central Office staff provides the application, with all documentation provided, and all internal review completed to CRP branch.
6. CRP branch reviews to ensure no additional documentation or clarification is needed.
7. Application is approved, and the Vendor is notified.
8. Vendor completes the Vendor Registration Process by a) Obtaining a vendor number by registering on our vendor self-service platform, or by completing an EZ Registration form and provide it to finance cabinet, along with a W9, for finance to establish a vendor number; b) Reviewing and signing a Vendor Agreement; and c) Reviewing and signing a CRP Agreement.
9. CRP Branch assists the Vendor with training and other information.
10. All CRP vendors are required to participate in the Supported Employment Training Project provided through the University of Kentucky Human Development Institute.
11. All CRP vendors are monitored by the CRP Branch Staff for programmatic review.
12. All CRP vendors are monitored by Central Office staff for financial review.
13. All CRPs are subject to audits at least once every three years, or more frequently, if necessary.
14. CRP Branch ensures all Employment Specialist have the mandated 15 hours of continuing education units (CEUs) annually, with at least 4 of the hours consisting specifically to servicing individuals who are blind, deaf, or DeafBlind.
15. CRPs are required to review and sign a CRP agreement every year.

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, 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 VR agency must select the "Edit" button to review and agree to the VR State plan Assurances.

The State Plan must 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 State plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.
3. Administration of the VR services portion of the Unified or Combined State Plan: The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:
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. either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.
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. as applicable, 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.
3.f. as applicable, the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.
3.g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.

The State Plan must include
3.h. the requirements 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.
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 as set forth in section 101(a)(18)(A).
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)(E) 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 or, if implementing an order of selection, in accordance with criteria established by the State for the order of selection as set out in section 101(a)(5) of the Rehabilitation Act.
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 the requirements for the development of an individualized plan for employment in accordance with section 102(b) 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

The State Plan must include
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 sections 101(a)(14) and 511 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,
4.j.i.A. strategies to address the needs identified in the assessments; and
4.j.i.B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
4.j.ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15), 101(a)(25) and 113).
4.j.iii. shall reserve not less than 15 % of the allocated funds for the provision of pre-employment transition services; such funds shall not be used to pay for the administrative costs of providing pre-employment transition services.
5. Program Administration for the Supported Employment Title VI Supplement to the State plan:
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.

The State Plan must include
6. Financial Administration of the Supported Employment Program (Title VI):
6.a. The designated State agency assures that it will expend no more than 2.5 % 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 % 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)(H) and (I) 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:
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 the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act 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)(7)(C) and (E) of the Rehabilitation Act.

Do you attest that these assurances will be met?
Yes

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 TITLE IV OF WIOA[1], AND ITS STATE PLAN SUPPLEMENT UNDER TITLE VI OF THE REHABILITATION ACT;

[1] Public Law 113-128.

ENTER THE NAME OF DESIGNATED STATE AGENCY OR DESIGNATED STATE UNIT, AS APPROPRIATE

Education and Labor Cabinet

2. IN THE EVENT THE DESIGNATED STATE AGENCY IS NOT PRIMARILY CONCERNED WITH VOCATIONAL AND OTHER REHABILITATION OF INDIVIDUALS WITH DISABILITIES, THE DESIGNATED STATE AGENCY MUST INCLUDE A DESIGNATED STATE UNIT FOR THE VR PROGRAM (SECTION 101(A)(2)(B)(II) OF THE REHABILITATION ACT). AS A CONDITION FOR THE RECEIPT OF FEDERAL FUNDS UNDER TITLE I OF THE REHABILITATION ACT FOR THE PROVISION OF VR SERVICES, THE (DESIGNATED STATE AGENCY OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT)[2]AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE VR SERVICES PROGRAM IN ACCORDANCE WITH THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[3], THE REHABILITATION ACT, 34 CFR 361.13(B) AND (C), AND ALL APPLICABLE REGULATIONS[4], POLICIES, AND PROCEDURES ESTABLISHED BY THE SECRETARY OF EDUCATION. FUNDS MADE AVAILABLE TO STATES UNDER SECTION 111(A) 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;

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] 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.

[4] 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 at 34 C.F.R. part 361.

ENTER THE NAME OF DESIGNATED STATE AGENCY

Kentucky Office of Vocational Rehabilitation

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, OR THE DESIGNATED STATE UNIT WHEN THE DESIGNATED STATE AGENCY HAS A DESIGNATED STATE UNIT, AGREES TO OPERATE AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE STATE SUPPORTED EMPLOYMENT SERVICES PROGRAM IN ACCORDANCE WITH THE SUPPLEMENT TO THE VR SERVICES PORTION OF THE UNIFIED OR COMBINED STATE PLAN[5], THE REHABILITATION ACT, AND ALL APPLICABLE REGULATIONS[6], 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;

[5] 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.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

4. THE DESIGNATED STATE UNIT OR, IF NOT APPLICABLE, THE DESIGNATED STATE AGENCY 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 AND IS RESPONSIBLE FOR THE ADMINISTRATION OF THE VR PROGRAM IN ACCORDANCE WITH 34 CFR 361.13(B) AND (C);

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

[1] Public Law 113-128.

[2] All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

[3] 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.

[4] 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 at 34 C.F.R. part 361.

[5] 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.

[6] Applicable regulations, in part, include the citations in footnote 4, as well as Supported Employment program regulations at 34 C.F.R. part 363.

CERTIFICATION SIGNATURE

To review and complete the Certification section of the VR portion of the State plan, please select the "Edit" button.

Note, please do not edit the table header or formatting. Only edit the table contents.

If you accidentally edit the table headers and structure, open this link to the blank table. You can copy and paste the table into the narrative field, and start over if needed.

Signatory information	Enter Signatory information in this column
Name of Signatory	Cora McNabb
Title of Signatory	Executive Director
Date Signed	

VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years

of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a % (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	65.0%		70.0%	
Employment (Fourth Quarter After Exit)	60.0%		63.0%	
Median Earnings (Second Quarter After Exit)	$9,500.00		$9,750.00	

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Credential Attainment Rate	33.0%		35.0%	
Measurable Skill Gains	39.0%		40.0%	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - VOCATIONAL REHABILITATION

STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

• Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, pregnancy, parenting, or caregiving status, and sexual orientation.

• Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.

• Applicants are not required to have mission statements or policies that align.

• Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.

• Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

Office of Vocational Rehabilitation (OVR) is committed to ensuring equitable access to and equitable participation in all vocational rehabilitation services, programs and activities provided by the agency and discussed in this proposed 4-year plan. The belief in the agency's core values, mission and vision statements are reflected in practices, policies, and strategic plans, for guidance and consistency within the agency and in service delivery.

The Agency's Principles

OVR Core Values:

OVR recognizes and respects the talents and contributions of all individuals as a vital part of a productive society; therefore, OVR values:

- That persons with disabilities deserve an opportunity;
- The rights, merit, and dignity of all persons with disabilities;
- Independence for Kentuckians with disabilities;
- Competitive, integrated employment;
- Career advancement and economic security; and
- Collaborative efforts and partnerships.

OVR Vision Statement:

All Kentuckians with disabilities have an opportunity to be an essential part of Kentucky's workforce and their communities.

OVR Mission Statement:

To empower Kentuckians with disabilities to maximize independence and economic security through competitive, integrated employment.

Mission Statement:

To create a culturally diverse and inclusive environment at all levels, including, but not limited to, OVR Staff, individuals we serve and community partners.

For more information, please see: Section B: CSNA; Section C: Goals, Priorities and Strategies; Section D: Evaluations and Reports of Progress; Section I: Comprehensive System of Personnel Development.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

OVR has identified barriers that may impede equitable access to consumers through multiple sources such as forums, internal and external surveys, and needs assessments. The following barriers that continue to affect consumers to equitable access and participation are: 1) the lack of program awareness; 2) transportation issues; and 3) physical barriers.

Program Awareness

Through input and comments from the Statewide Council for Vocational Rehabilitation (SCVR), public forums and internal surveying, OVR recognizes that many Kentuckians are unaware of the agency, its programs and services. This may impede progress towards equitable access to and equitable participation in the services provided to the public. The resources available for any person living with a disability who wants to work and who qualifies for services can be a crucial step for self-sufficiency, independence and inclusion into the working world and can be life changing. This is identified as a barrier to equitable access and participation since not knowing about the programs and services does not allow all Kentuckians with disabilities the opportunity to be served. Ensuring that OVR services are known to the public are related to outreach efforts and visibility across minority, underserved or unserved and rural populations as discussed in various sections of this state plan, but more specifically in Section B: Comprehensive Statewide Needs Assessment.

Transportation

During the state plan forums, there were multiple comments regarding continued transportation barriers. There are existing concerns of consumers in using for hire driving services such as Uber and Lyft due to safety concerns and lack of ability for many of the individually contracted drivers to provide the necessary accessibility features to meet the needs of the consumer as related to their specific disability. Consumers lack transportation options which present barriers to services and employment options, including those in rural areas.

Physical Structures

Physical barriers exist within some state buildings.

For more information, please see discussion in Section B: Comprehensive Statewide Needs Assessment, particularly subsection 1(b) and Section C.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

Based on the identified barriers to equitable access and participation, the steps OVR will or has taken are listed below:

Outreach:

Outreach has become a greater focus to ensure available services and resources are known. OVR continues to be a resource that many Kentuckians are unaware, and we are taking initiatives to address educating communities about these services.

OVR's Strategic Plan incorporates an outreach plan and process to improve public awareness that includes hiring a dedicated staff member for the outreach of the agency. The work for the dedicated staff would include presenting and representing culturally diverse settings that inform the public. As the first step towards this priority, the agency conducted a statewide outreach needs assessment in 2023 to determine staff needs to adequately represent the agency. At this time OVR is in process of conducting the 2027 Statewide Needs Assessment that will inform planning for the next state plan cycle. The agency was able to understand the requirements needed to implement the outreach plan, which include the collaborative efforts within the cabinet and the number of dedicated staff needed for outreach. Dedicated staff could serve as a direct representative, and point of initial contact, of minority and unserved or underserved communities. Currently, the agency prepares documents and information in both English and Spanish with the ability to address other languages through the Language Line Access Point contracted by the state for such services to assist in breaking language barriers.

Underserved communities include the Deaf and Hard of Hearing, and the agency ensures access and participation by providing needed services. Currently, American Sign Language Interpreters are available for trainings, meetings, forums, etc. as needed and when other signing needs are required beyond the scope of what internally available ASL interpreters can provide. The agency works with the Commission on Deaf and Hard of Hearing Services as well as other resource providers to secure the appropriate interpreter for the situation.

For more discussion, see Sections B, C 2(b), D, I 2(b) and 2(c), Section J, Section K, and Section L.

Transportation:

While OVR does not provide direct transportation to consumers, a process for reimbursement of expenses for certain services are in place. In urban areas public transportation is more available than in rural areas. In these cases, virtual options are provided to prevent transportation barriers from interfering with services needed. In addition to those services the agency can provide to assist with resources for transportation, OVR has a seated member on the Coordinated Transportation Advisory Committee (CTAC) that allows a voice for input into the currently available resources, deficits that exist in the current structure and future needs of those in need of public transit services.

During the State Plan Forums, suggestions from the public were made to involve the consumers family support system. It is not uncommon for consumers to rely on support structures for participation in services and for work which may include transportation. It was believed that if an authorized family or support contact was included and aware of appointments and other related meetings, this would help with transportation issues for some individuals. The agency considers the comments and input from the public.

The use of virtual services has greatly increased the ability to provide services. The agency utilizes SARA (Artificial Intelligence Application, Teams and Zoom as resources to interact with consumers and offer consumer choice as to whether services are preferred online or in-person. This has expanded the ability of individuals to receive services from our agency when transportation is a barrier for them.

Physical barriers:

Career Centers are required to obtain ADA certifications regarding their physical structures and address any barriers with correction as part of their certification process. Agency assistive technology staff provide expertise as needed regarding recommendations for accommodations necessary to allow consumers access into the physical structures where services are housed.

When business activities, meetings and trainings are planned the accessibility of any facility identified for use is reviewed by qualified staff to ensure equal access is available to all attendees.

The use of virtual services has greatly increased the ability to provide services without the structural barriers that exist in physical buildings. The agency utilizes Teams and Zoom as resources to interact with consumers and offer consumer choice as to whether services are preferred online or in-person. This has expanded the ability of individuals to receive services from our agency when transportation is a barrier for them.

For more information, please see: Section C: Goals, Priorities and Strategies; Section D: Evaluations and Reports of Progress, particularly priorities "Staff Resource," "Facility Operations" and "Public Awareness" discussions; Section E: Supported Employment Services, Distribution of Title IV Funds…, particularly E (4); Section I: Comprehensive System of Personnel Development, particularly 2(b); Section L: Interagency Cooperation with other Agencies.

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

The steps taken to address the identified barriers in question 3 are incorporated into OVR Throughout this state plan, access and participation is discussed as an agency concern for both internal and external consumers. The agency makes efforts to identify community and population needs of the state by providing reports in addition to the required CSNA, such as the Kentucky's Older Population and Vision Loss to learn even more about the states underserved and unserved populations.

Due to the broad effects some barriers have on consumers and the limitations OVR has on eliminating some barriers, such as public transportation availability and physical barriers that exist in other state buildings, most will be ongoing discussions to find ways services can still be provided. However, OVR has worked to bring consumers options, accommodations and adjustments for removing barriers that are often out of the agency's control as discussed in the previous question.

Targeted milestones are based on the timelines of the strategic plans, which are reviewed, measured and/or adjusted, yearly. For example, the following timelines are:

OVR Strategic Plan: Started on October 1, 2023, and will expire on September 30, 2027. The agency's new strategic plan carries over priorities from the last with revisions, adjustments, additions and the removal of objectives as having been met. The current plan will be rewritten in 2027, but revisions may occur prior to 2027 as goals are either met or in progress. For more information regarding goals, priorities and strategies, particularly for Public Awareness, and the progress made by the agency, see Sections B, C and D.

The OVR Engagement and Advocacy Team is made up of OVR staff. Their Vision Statement is that OVR will be the nation's exemplary VR agency and a model employer by leveraging advocacy and by fostering meaningful engagement for Kentucky's workforce to deliver optima vocational rehabilitation services.

The goals of the team are as follows:

Staff Engagement and Advocacy: Recruit, hire and retain staff to provide high quality services to Kentuckians with disabilities.

Consumer Engagement and Advocacy: Ensure consistent and high-quality service provision to all Kentuckians with disabilities through outreach, training, and data analysis.

OVR learns and discusses barriers of consumers regularly, from obtaining input and gaining insight through survey information. The partnership with the Statewide Council for Vocational Rehabilitation (SCVR) allows issues of concern to be shared more often with the agency whether formally or informally. OVR is committed to working to remove barriers to equitable access and participation in the agency and in its programs and services.

GEPA 427 FORM INSTRUCTIONS FOR APPLICATION PACKAGE - SUPPORTED EMPLOYMENT

STUDENTS, EDUCATORS, AND OTHER PROGRAM BENEFICIARIES

OMB Control Number 1894-0005 Expiration 02/28/2026

Section 427 of the General Education Provisions Act (GEPA) (20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA Section 427 Form Instructions for State Applicants

State applicants must respond to the following four questions:

1. Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

2. Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

3. Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

4. What is your timeline, including targeted milestones, for addressing these identified barriers?

• Applicants identify any barriers that may impede equitable access and participation in the proposed project or activity, including, but not limited to, barriers based on economic disadvantage, gender, race, ethnicity, color, national origin, disability, age, language, migrant status, rural status, homeless status or housing insecurity, parenting, or caregiving status, and sexual orientation.

• Applicants use the associated text box to respond to each question. However, applicants might have already included some or all this required information in the narrative sections of their applications or their State Plans. In responding to this requirement, for each question, applicants may provide a cross-reference to the section(s) in their State Plans that includes the information responsive to that question on this form or may restate that information on this form.

• Applicants are not required to have mission statements or policies that align.

• Applicants that have already undertaken steps to address barriers must still provide an explanation and/or description of the steps already taken in each text box, as appropriate, to satisfy the GEPA Section 427 requirement.

• Applicants that believe no barriers exist must still provide an explanation and/or description to each question to validate that perception, as appropriate, to satisfy the GEPA Section 427 requirement.

Please refer to GEPA 427 - Form Instructions for Application Package

1. DESCRIBE HOW YOUR ENTITY'S EXISTING MISSION, POLICIES, OR COMMITMENTS ENSURE EQUITABLE ACCESS TO, AND EQUITABLE PARTICIPATION IN, THE PROPOSED PROJECT OR ACTIVITY.

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The first of four questions is:

Describe how your entity's existing mission, policies, or commitments ensure equitable access to, and equitable participation in, the proposed project or activity.

Office of Vocational Rehabilitation (OVR) is committed to ensuring equitable access to and equitable participation in all vocational rehabilitation services, programs and activities provided by the agency and discussed in this proposed 4-year plan. The belief in the agency's core values, mission and vision statements are reflected in practices, policies, and strategic plans, for guidance and consistency within the agency and in service delivery.

The Agency's Principles:

OVR Core Values

OVR recognizes and respects the talents and contributions of all individuals as a vital part of a productive society; therefore, OVR values:

• That persons with disabilities deserve an opportunity;

• The rights, merit, and dignity of all persons with disabilities;

• Independence for Kentuckians with disabilities;

• Competitive, integrated employment;

• Career advancement and economic security; and

• Collaborative efforts and partnerships.

OVR Vision Statement

All Kentuckians with disabilities have an opportunity to be an essential part of Kentucky's workforce and their communities.

OVR Mission Statement

To empower Kentuckians with disabilities to maximize independence and economic security through competitive, integrated employment.

Vision Statement

The KY OVR will be the nation's exemplary VR agency and a model employer by leveraging and fostering belongingness to deliver optimal vocational rehabilitation services.

Mission Statement:

To create a culturally diverse and inclusive environment at all levels, including, but not limited to, OVR Staff, individuals we serve and community partners.

For more information, please see: Section B: CSNA; Section C: Goals, Priorities and Strategies; Section D: Evaluations and Reports of Progress; Section I: Comprehensive System of Personnel Development.

2. BASED ON YOUR PROPOSED PROJECT OR ACTIVITY, WHAT BARRIERS MAY IMPEDE EQUITABLE ACCESS AND PARTICIPATION OF STUDENTS, EDUCATORS, OR OTHER BENEFICIARIES?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the*

steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The second of four questions is:

Based on your proposed project or activity, what barriers may impede equitable access and participation of students, educators, or other beneficiaries?

OVR has identified barriers that may impede equitable access to consumers through multiple sources such as forums, internal and external surveys, and needs assessments.

The following barriers that continue to affect consumers to equitable access and participation are: 1) the lack of program awareness; 2) transportation issues; 3) physical barriers; and 4) limited provider capacity.

Program Awareness

Through input and comments from the Statewide Council for Vocational Rehabilitation (SCVR), public forums and internal surveying, OVR recognizes that many Kentuckians are unaware of the agency, its programs and services. This may impede progress towards equitable access to and equitable participation in the services provided to the public. The resources available for any person living with a disability who wants to work and who qualifies for services can be a crucial step for self-sufficiency, independence and inclusion into the working world and can be life changing. This is identified as a barrier to equitable access and participation since not knowing about the programs and services does not allow all Kentuckians with disabilities the opportunity to be served. Ensuring that OVR services are known to the public are related to outreach efforts and visibility across minority, underserved or unserved and rural populations as discussed in various sections of this state plan, but more specifically in Section B: Comprehensive Statewide Needs Assessment.

Transportation

During the state plan forums, there were multiple comments regarding continued transportation barriers. There are existing concerns of consumers in using for hire driving services such as Uber and Lyft due to safety concerns and lack of ability for many of the individually contracted drivers to provide the necessary accessibility features to meet the needs of the consumer as related to their specific disability. Consumers lack transportation options which present barriers to services and employment options, including those in rural areas.

Physical Structures

Physical barriers exist within some state buildings.

Limited Provider Capacity

Through input from public forums and internal and external surveying, OVR recognizes that many Kentuckians may not have access to viable supported employment services. There are many providers that have implemented waiting lists, which may delay access to services. In some cases, this is due to having only one provider in a given area. In others, it may be due to limited staff among respective providers.

For more information, please see discussion in Section B: Comprehensive Statewide Needs Assessment.; Section E: Supported Employment Services and the Distribution of Title VI Funds.

3. BASED ON THE BARRIERS IDENTIFIED, WHAT STEPS WILL YOU TAKE TO ADDRESS SUCH BARRIERS TO EQUITABLE ACCESS AND PARTICIPATION IN THE PROPOSED PROJECT OR ACTIVITY?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

GEPA 427 - Form Instructions for Application Package

State applicants must respond to four questions.

The third of four questions is:

Based on the barriers identified, what steps will you take to address such barriers to equitable access and participation in the proposed project or activity?

Outreach has become a greater focus to ensuring available services and resources are known. OVR continues to be a resource that many Kentuckians are unaware, and we are taking initiatives to address educating communities about these services.

OVR's Strategic Plan incorporates an outreach plan and process to improve public awareness that includes hiring a dedicated staff member for the outreach of the agency. The work for the dedicated staff would include presenting and representing culturally diverse settings that inform the public. As the first step towards this priority, the agency conducted a statewide outreach needs assessment in 2023 to determine staff needs to adequately represent the agency. The agency was able to understand the requirements needed to implement the outreach plan, which include the collaborative efforts within the cabinet and the number of dedicated staff needed for outreach. Dedicated staff could serve as a direct representative, and point of initial contact, of minority and unserved or underserved communities. Currently, the agency prepares documents and information in both English and Spanish with the ability to address other languages through the Language Line Access Point contracted by the state for such services to assist in breaking language barriers.

OVR has increased its focus on building provider capacity for the provision of supported employment services. The development and implementation of establishment project grants for the purpose of expanding Individual Placement and Support and Customized Employment will continue. This will result in request for proposal opportunities for existing CRPs to expand their scope of service and/or geographic area for existing services, or for prospective CRPs to develop programs in underserved areas. The agency has been able to explore perspectives of CRPs to better understand sustainability issues impacting them. OVR has begun the process to explore supported employment rates and systems, to better determine the unintended impact on CRPs.

Transportation:

While OVR does not provide direct transportation to consumers, a process for reimbursement of expenses for certain services are in place. In urban areas public transportation is more available than in rural areas. In these cases, virtual options are provided to prevent transportation barriers from interfering with services needed. In addition to those services the agency can provide to assist with resources for transportation, OVR has a seated member on the Coordinated Transportation Advisory Committee (CTAC) that allows a voice for input into the currently available resources, deficits that exist in the current structure and future needs of those in need of public transit services.

During the State Plan Forums, suggestions from the public were made to involve the consumers family support system. It is not uncommon for consumers to rely on support structures for participation in services and for work which may include transportation. It was believed that if a provided and authorized family or support contact was included and aware of appointments and other related meetings, this would help with transportation issues for some individuals. The agency considers the comments and input from the public.

The use of virtual services has greatly increased the ability to provide services. The agency utilizes Teams and Zoom as resources to interact with consumers and offer consumer choice as to whether services are preferred online or in-person. This has expanded the ability of individuals to receive services from our agency when transportation is a barrier for them.

For more information, please see: Section C: Goals, Priorities and Strategies; Section D: Evaluations and Reports of Progress, particularly priorities “Staff Resource,” “Facility Operations” and “Public Awareness” discussions; Section E: Supported Employment Services, Distribution of Title IV Funds…

4. WHAT IS YOUR TIMELINE, INCLUDING TARGETED MILESTONES, FOR ADDRESSING THESE IDENTIFIED BARRIERS?

Section 427 of the General Education Provisions Act (GEPA) *(20 U.S.C. 1228a) applies to a State applicant submitting a state plan for a formula grant from the US Department of Education. The State applicant is responsible for completing the GEPA Section 427 form that provides a description of the steps the State proposes to take to ensure all program beneficiaries have equitable access to, and participation in, its Federally funded, State-level project or activity.*

State applicants must respond to four questions.

The final of four questions is:

What is your timeline, including targeted milestones, for addressing these identified barriers?

The steps taken to address the identified barriers in question 3 are incorporated into OVR's strategic plan to address as a priority. Throughout this state plan, provider capacity is discussed as an agency concern for both internal and external consumers. The agency makes efforts to identify community and population needs of the state by conducting surveys to learn even more about the states under-served and unserved populations.

Due to the broad affects some barriers have on consumers and the limitations OVR has on eliminating some barriers, such as public transportation availability, physical barriers, and limited provider capacity that exist, most will be ongoing discussions to find ways services can still be provided. However, OVR has worked to bring consumers options, make accommodations and adjustments for removing barriers that are often out of the agency's control as discussed in the previous question.

Targeted milestones are based on the timelines of the strategic plans, which are reviewed, measured and/or adjusted, yearly. For example, the following timelines are:

OVR Strategic Plan: Started on October 1, 2023, and will expire on September 30, 2027. The agency's new strategic plan carries over priorities from the last with revisions, adjustments, additions and the removal of objectives as having been met. The current plan will be rewritten in 2027, but revisions may occur prior to 2027 as goals are either met or in progress. For more information regarding goals, priorities and strategies, particularly provider capacity, and the progress made by the agency, *see Sections D and E.*

OVR learns and discusses barriers of consumers regularly, from obtaining input and gaining insight through survey information. The partnership with the Statewide Council for Vocational Rehabilitation (SCVR) allows issues of concern to be shared more often with the agency whether formally or informally. OVR is committed to working to remove barriers to equitable access and participation in the agency and in its programs and services.

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. 24

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.

TRADE ADJUSTMENT ASSISTANCE (TAA)

There are no program-specific state planning requirements for TAA. If the state includes TAA in a Combined State Plan, the state must incorporate TAA in its responses to the common planning elements in sections II, III, IV, and V of the WIOA State Plan requirements instrument.

Has the state incorporated TAA into the sections indicated above?

Yes

JOBS FOR VETERANS’ STATE GRANTS

(OMB Control Number: 1293-0017)

Components of the Jobs for Veterans State Grants State Plan

Jobs for Veterans State Grants (JVSG) recipients must provide a four-year state plan as a condition for the receipt of annual funding in accordance with 38 U.S.C. § 4102A(c). This plan must include responses to each of the components below.

A. DESCRIBE HOW THE STATE INTENDS TO PROVIDE EMPLOYMENT, TRAINING, AND JOB PLACEMENT SERVICES TO VETERANS AND ELIGIBLE PERSONS UNDER THE JVSG PROGRAM (I.E., VIRTUALLY AND IN-PERSON).

The Commonwealth of Kentucky, hereinafter referred to as the “state,” provides the following information for the Jobs for Veterans State Grant (JVSG).

JVSG is a mandatory, formula-based staffing grant to support Disabled Veterans' Outreach Program (DVOP) specialists, Local Veterans' Employment Representatives (LVER), and Consolidated (CODL). JVSG is funded annually in accordance with a formula defined in statute and regulation and operates on a fiscal year (not program year) basis. However, performance metrics are collected and reported quarterly (using four “rolling quarters”) on a program year basis (as with the ETA-9173 Series).

Kentucky intends to provide services to veterans and other eligible persons by JVSG staff members according to the needs of the veteran, any qualifying employment barrier (QEB) they possess, and within the roles and responsibilities of JVSG personnel. DVOP, CODL, and LVER specialists are essential parts of and are fully integrated into the Kentucky Career Center Network.

All job seekers complete an initial assessment which is used to identify potential veterans and other eligible persons. When a veteran or other eligible person is identified, career center intake staff ask additional questions to determine if they have an eligible QEB.

Staff utilize the state's veteran information form which contains a concise list of QEB criteria, along with the definitions of others who are eligible, military service and relevant household details. When a determination is made that the veteran or other eligible person is eligible and in need of individualized career services, they are referred to a DVOP/CODL specialist.

Once a veteran or other eligible person is determined by career center staff to be "job ready," the veteran or other eligible person's resume will be referred to a LVER/CODL. Employment placement services may include job development, direct referral to an employer, referral to attend an employer job fair, referral to the employer's website, or any other means of connecting the veteran or other eligible person with an employer.

Ultimately, the duties of DVOP, CODL and LVER staff throughout the state are consistent with the roles and responsibilities outlined in 38 U.S.C. § 4103A, 4104, and current guidance provided by the United States Department of Labor (USDOL) Veterans' Employment and Training Services (VETS).

B. LIST THE POPULATIONS TO BE SERVED BY DISABLED VETERANS' OUTREACH PROGRAM (DVOP) AND CONSOLIDATED POSITION STAFF, INCLUDING THE ELIGIBILITY CRITERIA FOR REFERRAL FOR DVOP SERVICES.

The populations to be served by DVOP/CODL specialists are provided below:

- Has a disability, which may include any of the following:
    - Special disabled veteran, defined in 38 U.S.C. § 4211(1) as a veteran who is 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 for a disability rated at 30 percent or more, or rated at 10 or 20 percent in the case of a veteran who has been determined to have a serious employment handicap; or person who was discharged or released from active duty because of a service-connected disability.
    - Disabled veteran, defined in 38 U.S.C. § 4211(3) as a veteran who is 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 Affairs1F2; or a person who was discharged or released from active duty because of a service-connected disability.
    - Other disability. Eligible veterans and eligible persons who self-identify as having a

disability, as defined by the Americans with Disabilities Act, 42 U.S.C. § 12102.

- Is a Vietnam-era veteran, as defined by 38 U.S.C. § 4211(2) as an eligible veteran any part of whose active military, naval, or air service was during the Vietnam era, as defined by 38 U.S.C. § 101(29).
- Is a recently separated veteran, defined in 38 U.S.C. § 4211(6) as a veteran who was discharged or released from active duty within the last three years.
- Has been referred for employment services by a representative of the Department of Veterans Affairs.
- Is experiencing homelessness, as defined in Sections 103(a) and (b) of the McKinney Vento Homeless Assistance Act (42 U.S.C. § 11302(a) and (b)).
- Is justice-involved, as defined in WIOA Section 3(38), 29 U.S.C. § 3102(38) (definition of "offender").
- Is between the ages of 18–24 years of age at the time of enrollment.
- Is educationally disadvantaged, meaning that the person lacks a high school diploma or equivalent certificate.
- Is economically disadvantaged, which means any of the following:
  - Meets the definition of a low-income person in WIOA Section 3(36), 29 U.S.C. § 3102(36).
  - Unemployed.
  - Heads of single-parent households containing at least one dependent child.
- Additional Populations.
  - Transitioning Service Members (TSM) who, at the time of enrollment have participated in any part of the Transition Assistance Program, including self-paced online modules and Individualized Initial Counseling.
  - Wounded, ill, or injured members of the Armed Forces who are receiving treatment in military treatment facilities or warrior transition units.
  - Spouses or other family caregivers of those wounded,

In addition to the above clarifications to the definition of QEB, the following guidance is provided to JVSG Staff to improve the identification and support of disabled veterans. In accordance with VPL 05-24 and TEGL 23-19 Change 2, the determination of veteran service and QEBs are determined solely on the basis of self-identification. Furthermore, any person who separated from active duty because of a service-connected disability qualifies as a disabled veteran regardless of the number of

days of active duty served, as does any veteran with a disability rating provided by the Department of Veterans Affairs (VA) (or a military Service issued disability determination) as described in 38 U.S.C. § 4211(1). Finally, a person who attests to having a disability claim pending with the VA should be considered to have an approved claim for the purpose of determining QEB.

C. DESCRIBE THE ROLES AND RESPONSIBILITIES ASSIGNED TO DISABLED VETERANS' OUTREACH PROGRAM (DVOP) SPECIALISTS, LOCAL VETERANS' EMPLOYMENT REPRESENTATIVE (LVER) STAFF, AND CONSOLIDATED DVOP/LVER POSITIONS BY THE STATE. THESE MUST BE CONSISTENT WITH 38 U.S.C. 4103A AND 4104.

Kentucky DVOP/CODL specialists provide basic and individualized career services to eligible participants. These services help participants overcome employment barriers and achieve their employment goals. DVOP/CODL specialists can serve participants directly as well as by referring them to appropriate resources. These resources may include other workforce development programs and training opportunities and any other in-person or virtual federal, state, and local programs for which the participant may be eligible.

DVOP/CODLs Roles and Responsibilities:

- Perform case management duties, to include consistent client follow-up, detailed case notes, completion of a detailed assessment, and IEP development.
- Based on veterans' or other eligible persons' employment facilitating requirements needs, as determined throughout the persons assessment and IEP, staff may refer the veteran or other eligible person to supportive services, which may include but are not limited to:
    - Workforce Innovation and Opportunity Act (WIOA) Partners
    - Kentucky Office of Vocational Rehabilitation
    - Kentucky Department of Veterans Affairs
    - Department of Veterans Affairs' Medical Centers
    - Vocational Rehabilitation and Employment (VR&E) Programs
    - Homeless Veterans Reintegration Project (HVRP) grantees
    - Community/Civic Service Organizations (CSO), Faith Base Organizations (FBO) and Veteran Service Organizations (VSO)
    - Military Installations
    - Local Homeless Shelters
    - Community Stand Downs
    - Veterans Court
- Conduct outreach, relationship building and recruitment activities with career center,

governmental, non-governmental, and community partners to identify potential veteran support services.

- Outreach activities (both scheduled and ad hoc) focus outreach activities on programs, places, and organizations where there is a high probability of meeting veterans/other eligible persons with a QEB(s).

- Provide, recommend, or facilitate a full range of training resources, to include gathering and interpreting labor market information (LMI) to assist veteran or other eligible person in making informed career/employment decisions.

LVER/CODLs Roles and Responsibilities:

Advocate for all veterans and the additional populations with business, industry, and other community-based organizations by participating in appropriate activities. These activities include, but are not limited to:

- Plan, conduct, and participate in job and career fairs.
- Conduct employer outreach, including facility tours or interviews with current employees to familiarize themselves with job responsibilities or qualifications.
- Assist with job development for veterans, eligible persons, and other eligible populations enrolled in workforce development programs.
- Facilitate job search workshops/groups, on behalf of/in conjunction with employers, provided that DVOP and/or other AJC staff are available to deliver any needed direct services.
- Work with established unions, apprenticeship programs, and businesses or business organizations to promote and secure employment and training for veterans.
- Inform federal contractors of the process to recruit qualified veterans.
- Promote credentialing and licensing opportunities for veterans.
- Coordinate and participate with other business outreach efforts, including the efforts of WIOA business service representatives.
- Educate and train AJC staff to ensure easier access to the appropriate employment and training services for job-seeking veterans.
- Conduct community outreach and presentations on behalf of employers seeking to hire veterans.
- Promote initiatives and programs such as the DoD SkillBridge program.

- Promote the HIRE Vets Medallion Program and assisting local area employers in applying for the award when appropriate.
- Deliver comprehensive quarterly staff training and develop targeted supplemental sessions (group or person) to address current trends and optimize team performance as required.
- Oversee Priority of Service (POS) adherence; investigate issues and coordinate with management to rectify deviations, ensuring veterans receive preferential access to all workforce programs.
- While a member of the Business Services Team (BST), the LVER/CODL serves as a dedicated advocate for veteran employment. This role focuses on bridge-building with industries, unions, and apprenticeship programs to create veteran-specific opportunities. Note that LVER/CODL services are exclusively restricted to eligible veteran populations.
- LVER/CODLs inform community partners of Veteran Services. LVER/CODLs are encouraged to attend community meetings such as area unions, hiring events, and local chamber of commerce to promote all the career center services, both as a networking tool and for the opportunity to speak about veterans' programs.

Additional JVSG Staff responsibilities:

- Draft and deliver weekly and quarterly reports to management and State Veterans Program Coordinators (SVPC), specifically the JVSG State Supervisor and the Procedures Development Specialist.
- Every newly assigned staff member will be paired with a Mentor (a senior DVOP, LVER or CODL). The mentor is not the primary technical trainer. Instead, they serve as a peer resource to answer daily operational questions, provide guidance on navigating complex veteran cases, and offer professional encouragement. Mentors and mentees should meet at least bi-weekly during the first six months to ensure the new hire is successfully integrated into the career center environment.

D. DEMONSTRATE THE MANNER IN WHICH DVOP, LVER AND CONSOLIDATED DVOP/LVER STAFF ARE INTEGRATED INTO THE STATE'S EMPLOYMENT SERVICE DELIVERY SYSTEMS OR AMERICAN JOB CENTER (AJC). THIS DEMONSTRATION SHOULD SHOW ACTIVE ENGAGEMENT BETWEEN JVSG AND OTHER AJC STAFF, SUCH AS THROUGH PARTICIPATION IN STAFF MEETINGS AND CROSS-TRAINING OPPORTUNITIES.

JVSG staff regularly attend career center meetings to provide program updates and facilitate discussions on veteran services. To maximize outreach, staff brief customers on employment resources during orientations and Reemployment Service and Eligibility Assessment (RESEA) sessions. Additionally, LVER/CODLs participate in Business Service Team (BST) and Workforce Innovation Board meetings to advocate for veteran interests at a strategic level.

To foster teamwork within our career centers, we implement several collaborative measures. When appropriate, JVSG staff participate in case management and documentation training alongside state partners. Additionally, JVSG team members receive dedicated familiarization training with career center partner programs.

Each JVSG office will develop a consolidated annual outreach plan for approval by the JVSG State Supervisor. To ensure consistent coverage across primary and satellite offices, staff should coordinate these plans with their Office Manager prior to submission. Once approved, the final plans will be distributed to the respective Regional and Office Managers to ensure transparency. These plans must specifically identify target outreach locations, including local businesses and service organizations, while clearly addressing Business Service Team (BST) requirements.

E. DESCRIBE THE STATE'S PERFORMANCE INCENTIVE AWARD PROGRAM TO ENCOURAGE INDIVIDUALS AND/OR EMPLOYMENT SERVICE OFFICES TO IMPROVE AND/OR ACHIEVE EXCELLENCE IN THE PROVISION OF SERVICES TO VETERANS, INCLUDING:

1. THE NOMINATION AND SELECTION PROCESS FOR ALL PERFORMANCE INCENTIVE AWARDS TO INDIVIDUALS AND/OR OFFICES;

Authorized under VPL 1-24, the JVSG Monetary Incentive Awards Program recognizes state employees and offices providing exceptional service to veterans and eligible persons. Per federal guidance, 1% of JVSG funding is allocated for these awards. The program aims to foster a veteran-centric culture across all Career Development Office (CDO) staff and drive continuous improvement in service delivery within the Kentucky Career Center (KCC) network

Nomination and Submission Guidelines:

The State Supervisor will establish all deadlines. Nominations (including self-nominations) must be submitted in Microsoft Word (12-pt Times New Roman, 1-inch margins).

- Quarterly: Two performance statements (max 2 lines each) OR one significant event narrative (max 4 lines).
- Annual (Distinguished): Five performance, two community, and one self-improvement statements (max 2 lines each).
- Annual (Superior/KCC): Four performance and one significant event/community statements (max 2 lines each).

Performance periods for annual awards run from July 1 to June 30 and quarterly awards cover the preceding quarter.

Award Evaluation and Selection Process:

All quarterly and annual nominations for individuals and Kentucky Career Centers will be evaluated by a formal Selection Board. The board will meet virtually.

2. THE APPROXIMATE NUMBER AND VALUE OF CASH AWARDS USING THE ONE % INCENTIVE AWARD ALLOCATION;

Individual Recognition Categories and Award Cash Value:

- Quarterly Excellence: One JVSG staff member will be awarded $500 per quarter for sustained performance or a significant event supporting the veteran community.
- Annual Distinguished Performer (1 JVSG Staff Members): $2,400 – For sustained excellence, community engagement, and professional development.
- Annual Superior Performers (1 DVOP, 1 LVER, and 1 CODL Staff Member): $2,000 each – For sustained superior performance and notable achievements.
- Annual Superior Performer (1 RESEA/Wagner-Peyser Staff Member): $2,000 – For exceptional veteran support through impactful initiatives.

Kentucky Career Center Recognition and Award Cash Value:

Two centers will be recognized annually: Distinguished (Top) KCC and Superior (Runner-up) KCC. Remaining incentive funds, after individual awards and fringe obligations, will be distributed via a 60/40 split to these centers.

3. THE GENERAL NATURE AND APPROXIMATE VALUE OF NON-CASH PERFORMANCE INCENTIVE AWARDS TO BE CHARGED TO THE BASE ALLOCATION; AND

The state will purchase small trophies (approx. $58 per unit) using base allocation funds to recognize staff members earning quarterly or annual performance awards. Additionally, an annual winner will be offered professional development at the National Association of State Workforce Agencies (NASWA) Veterans Conference, which provides critical training on the Jobs for Veterans State Grant (JVSG) and strategies to address barriers such as service-connected disabilities and homelessness. Total conference costs are estimated at $3,000 per attendee (based on a Washington D.C. venue), inclusive of airfare ($500), lodging ($1,150), per diem ($300), registration ($750) and miscellaneous expenses. Participation facilitates direct collaboration with national grant leadership and ensures staff excellence is rewarded with high-level alignment to national and state workforce objectives.

4. ANY CHALLENGES THE STATE MAY ANTICIPATE TO CARRYING OUT A PERFORMANCE INCENTIVE AWARD PROGRAM AS MANDATED BY 38 U.S.C. § 4102A(C). THIS SHOULD INCLUDE ANY STATE LAWS OR POLICIES THAT PROHIBIT SUCH AWARDS, IF APPLICABLE. DESCRIBE THE STATE'S EFFORTS IN OVERCOMING THOSE CHALLENGES.

The Commonwealth of Kentucky does not anticipate any challenges to carrying out a performance incentive award program as mandated.

F. LIST THE PERFORMANCE TARGETS FOR DIRECT SERVICES TO VETERANS PROVIDED BY JVSG STAFF, AS MEASURED BY PARTICIPANTS':

- employment rate in the second quarter after exit from the program;
- employment rate in the fourth quarter after exit; and
- median earnings in the second quarter after exit.

Per VPL 01-22, states must identify and set performance targets for specific indicators for direct services to veterans provided by JVSG staff in their State Plans. The established JVSG targets will cover veterans served by JVSG staff only. The 2024-2027 state performance targets for services to veterans are the following:

Employment Rate – 2nd Quarter After Exit: 65.0%

Employment Rate – 4th Quarter After Exit: 67.0%

Median Earnings – 2nd Quarter After Exit: $5,900

UNEMPLOYMENT INSURANCE (UI)

(OMB Control Number: 1205-0132)

The Unemployment Insurance (UI) program requires a State Quality Service Plan (SQSP) on a 2-year planning cycle that is a condition of receipt of administrative funding to administer the program. The SQSP is the State's UI performance management and planning process that allows for an exchange of information between Federal and State partners to enhance the UI program's ability to reflect their joint commitment to performance excellence and client-centered services. A formal two-year SQSP is submitted biennially. On the off years, States may be required to modify the SQSP with additional corrective action plans and narrative if they are failing any new performance measures, and they are required to provide updated budget documents, certifications, and assurances. ETA Handbook No. 336, 18th Edition provides detailed guidance for the preparation and submittal of the SQSP and supplemental guidance is provided in an annual UIPL, issued as UIPL 15-19 for the FY 2020 SQSP. The Social Security Act (SSA) sections 302 and 303 authorize the Secretary of Labor to provide funds to administer

the UI program and govern the expenditure of those funds. States that choose the option to include UI in a WIOA Combined State Plan will be required to submit their SQSP through the Combined State Plan process. The SQSP must be prepared in accordance to the instructions in ET Handbook 336, 18th Edition and there are no changes to the established SQSP cycle if a State chose to submit their SQSP through the Combined State Plan process.

A. CONTENTS OF A COMPLETE UI SQSP PACKAGE

A complete UI SQSP package includes the following documents, as described in Chapter 1, ETA Handbook 336, 18th Edition:

1. TRANSMITTAL LETTER

A cover letter to the appropriate Regional Office (RO) transmitting all the required SQSP documents.

EDUCATION AND LABOR CABINET
Office of Unemployment Insurance

Andy Beshear
Governor

Mayo Underwood Building
500 Mero Street, 4th Floor
Frankfort, KY 40601
Telephone: (502) 564-2900

Jamie Link
Secretary

Ms. Lenita Jacobs-Simmons
UI Program Specialist
U.S. Department of Labor

October 7, 2025

Dear Ms. Jacobs-Simmons,

Enclosed is the Kentucky Office of Unemployment Insurance State Quality Service Plan for Federal Fiscal Year 2026. All required pages from Kentucky are included in this plan.

The help and support of the Atlanta Regional Office is greatly appreciated. If any additional information is needed or if you have any questions regarding this plan, please contact Tara Welch, Administrative Branch Manager at (502) 792-3192 or taram.welch@ky.gov.

Sincerely,

Greg Higgins
Executive Director
Office of Unemployment Insurance

2. BUDGET WORKSHEETS/FORMS

Budget worksheets/forms and plan for program administration based on projected allocations received from the Federal partner. These forms include Worksheet UI-1 and SF 424, SF 424A and SF 424B. The SF 424A is only required if the State vary the quarterly distribution of base claims activity staff years.

View Burden Statement

OMB Number: 4040-0004
Expiration Date: 11/30/2025

Application for Federal Assistance SF-424

* 1. Type of Submission:	* 2. Type of Application:	* If Revision, select appropriate letter(s):
☐ Preapplication	☒ New	
☒ Application	☐ Continuation	* Other (Specify):
☐ Changed/Corrected Application	☐ Revision	

* 3. Date Received:	4. Applicant Identifier:
Completed by Grants.gov upon submission.	ETA-UIPL-UIPL-15-25-Base

5a. Federal Entity Identifier:	5b. Federal Award Identifier:
ETA-UIPL-UIPL-15-25-Base	

State Use Only:

6. Date Received by State: 08/21/2025	7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:	Department of Workforce Development
* b. Employer/Taxpayer Identification Number (EIN/TIN):	* c. UEI:
61-0600439	PS8LB4RGHJM8

d. Address:

* Street1:	500 Mero Street
Street2:	4th Floor
* City:	Frankfort
County/Parish:	Franklin
* State:	KY: Kentucky
Province:	
* Country:	USA: UNITED STATES
* Zip / Postal Code:	40601.1251

e. Organizational Unit:

Department Name:	Division Name:
OFFICE OF THE SECRETARY	DIV OF FISCAL MANAGEMENT

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:	Mr.
* First Name:	JAMES
Middle Name:	H
* Last Name:	LAMBERT
Suffix:	
Title:	FEDERAL FUND ACCOUNTANT MANAGER
Organizational Affiliation:	
* Telephone Number:	502-564-2263
Fax Number:	
* Email:	james.lambert@ky.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Employment and Training Administration

11. Assistance Listing Number:

17.225

Assistance Listing Title:

Unemployment Insurance

*** 12. Funding Opportunity Number:**

ETA-UIPL-15-25-BASE

* Title:

Fiscal Year (FY) 2026 State Workforce Agency Unemployment Insurance (UI) Resource Planning Targets and Guidelines

13. Competition Identification Number:

ETA-UIPL-15-25-BASE

Title:

Fiscal Year (FY) 2026 State Workforce Agency Unemployment Insurance (UI) Resource Planning Targets and Guidelines

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

ETA-UIPL-15-25-Base

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant 001 * b. Program/Project KY-ALL

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2025 * b. End Date: 12/31/2028

18. Estimated Funding ($):

* a. Federal	28,464,669.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	28,464,669.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:	Mr.
* First Name:	JAMES
Middle Name:	M
* Last Name:	LINK
Suffix:	
* Title:	CABINET SECRETARY
* Telephone Number:	508-564-0444
Fax Number:	
* Email:	jamie.link@ky.gov
* Signature of Authorized Representative:	Completed by Grants.gov upon submission.
* Date Signed:	Completed by Grants.gov upon submission.

GRANTS.GOV™

WORKSPACE FORM

1-800-518-4726
SUPPORT@GRANTS.GOV

This Workspace form is one of the forms you need to complete prior to submitting your Application Package. This form can be completed in its entirety offline using Adobe Reader. You can save your form by clicking the "Save" button and see any errors by clicking the "Check For Errors" button. In-progress and completed forms can be uploaded at any time to Grants.gov using the Workspace feature.

When you open a form, required fields are highlighted in yellow with a red border. Optional fields and completed fields are displayed in white. If you enter invalid or incomplete information in a field, you will receive an error message. Additional instructions and FAQs about the Application Package can be found in the Grants.gov Applicants tab.

OPPORTUNITY & PACKAGE DETAILS:

Opportunity Number:	ETA-UIPL-15-25-BASE
Opportunity Title:	Fiscal Year (FY) 2026 State Workforce Agency Unemployment Insurance (UI) Resource Planning Targets and Guidelines
Opportunity Package ID:	PKG00291382
Assistance Listing Number:	17.225
Assistance Listing Title:	Unemployment Insurance
Competition ID:	ETA-UIPL-15-25-BASE
Competition Title:	Fiscal Year (FY) 2026 State Workforce Agency Unemployment Insurance (UI) Resource Planning Targets and Guidelines
Opening Date:	08/21/2025
Closing Date:	09/22/2025
Agency:	Employment and Training Administration
Contact Information:	Rahel Bisuayene

APPLICANT & WORKSPACE DETAILS:

Workspace ID:	WS01569082
Application Filing Name:	ETA-UIPL-15-25-Base
UEI:	PS8LB4RGHJM8
Organization:	Department of Workforce Development
Form Name:	Application for Federal Assistance (SF-424)
Form Version:	4.0
Requirement:	Mandatory
Download Date/Time:	Mar 02, 2026 08:29:10 AM EST
Form State:	No Errors

OMB Number: 4040-0007
Expiration Date: 07/31/2028

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.

2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.

5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).

6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C.§§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U. S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.

8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.

10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is $10,000 or more.

11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).

14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.

15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.

16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.

17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."

18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
/s/ Michael Yoder	Commissioner
APPLICANT ORGANIZATION	DATE SUBMITTED
Department of Workforce Development	03/02/2026

Standard Form 424B (Rev. 7-97) Back

Signature:

Email: michael.yoder@ky.gov

Assurances for Non-Construction Programs (SF-424B)

Final Audit Report 2026-03-03

Created:	2026-03-03
By:	James Lambert (james.lambert@ky.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAAImjBY6_PI6NUhPx287GybomusM0ZbQFo

"Assurances for Non-Construction Programs (SF-424B)" History

Document created by James Lambert (james.lambert@ky.gov)
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Signer michael.yoder@ky.gov entered name at signing as Michael Yoder
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Document e-signed by Michael Yoder (michael.yoder@ky.gov)
Signature Date: 2026-03-03 - 4:50:06 PM GMT - Time Source: server- IP address: 75.244.108.180

Agreement completed.
2026-03-03 - 4:50:06 PM GMT

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3. THE STATE PLAN NARRATIVE

State Plan Narrative is a vital element of the SQSP that provides a vehicle for sharing with the Federal partner State-specific efforts that affect the administration of the UI Program. The State Plan Narrative allows the State to describe in a single narrative: a) State performance in comparison to the Government Performance Review Act goals; b) actions planned to correct deficiencies regarding UI programs, UI program reviews and reporting requirements; and c) results of customer satisfaction surveys (optional).

removed per request

4. CORRECTIVE ACTION PLANS (CAPS)

CAPs are expected as a part of the SQSP when State's annual performance does not meet the established criteria for core measures, Secretary's Standards, UI program, assurances, and other program deficiencies identified in the annual SQSP guidance provided by the Department. The CAP must list both specific milestones for key corrective actions or improvement activities, and the completion date for each milestone.

Kentucky

MEASURES/PROGRAMS TO BE ADDRESSED FOR ALTERNATE SQSP FISCAL YEAR (FY) 2026

	Measures/Programs to be Addressed (Each Measure Below is Hyperlinked to the CAP Worksheet)	Acceptable Level of Performance (ALP)	Corrective Action Plan (CAP) N	Corrective Action Plan (CAP) E	Narrative Required (In Word Doc.)	SQSP 2026 Performance Year Data
BENEFITS	First Payment Promptness	≥ 87%		X		58.50%
	First Payment Promptness (IntraState 14/21 Days)	≥ 87%		X		58.1%
	First Payment Promptness (InterState 14/21 Days)	≥ 70%		X		61.7%
	First Payment Promptness (IntraState 35 Days)	≥ 93%		X		66.2%
	First Payment Promptness (InterState 35 Days)	≥ 78%		X		71.0%
	Nonmonetary Determination Timeliness	≥ 80%		X		40.00%
	Nonmonetary Determination Quality - Separations	≥ 75%		X		51.90%
	Nonmonetary Determination Quality - Nonseps	≥ 75%		X		69.70%
APPEALS	Lower Authority Appeals (30 Days)	≥ 60%		X		30.50%
	Lower Authority Appeals (45 Days)	≥ 80%		X		54.70%
	Average Age of Pending Lower Authority Appeals	≤ 30 days				31.3
	Average Age of Pending Higher Authority Appeals	≤ 40 days				26.3
	Lower Authority Appeals Quality	≥ 80%				96.10%
TAX	New Employer Status Determinations Timelapse	≥ 70%				85.60%
	Tax Quality (Part A)	No more than 3 tax functions failing TPS in a year	X			**Fail:** Report Delinquency Debits/Billings - Contributory Credits/Refunds Benefit Charging
	Tax Quality (Part B)	The same tax function cannot fail for 3 consecutive years				Pass
	TPS Sample Reviews	Pass				Pass
	Effective Audit Measure	Pass 4 factors/score ≥ 7				Pass
INTEGRITY	Improper Payments Measure	< 10%		X		35.34%
	Detection of Overpayments - 3 Year Measure	≥ 50% & ≤ 95%		X		627.12%
	Overpayment Recovery Measure	≥ 68%		X		-21.71%
	Data Validation - Benefits (All Submitted & Passing)	All Benefit Pops Submitted & Passing		X		**Fail:** Benefits 1, 2, 6-8, 10-14: BTQ 1-3 **Not Submit:** Benefits 3, 4, 15
	Data Validation - Tax (All Submitted & Passing)	All Tax Pops Submitted & Passing		X		**Fail:** Tax 1, 2, 4; TPS 1-4 **Not Submit:** Tax 3 & 5
	NDNH BAM Compliance	Pass				Pass

BAM	NDNH BAM Compliance	Pass				Pass
BAM	BAM Operations Compliant	Pass All M&P				**Fail** Case Completion: Paid = 471 **Fail** Comparison Report: Denied (Nnon-Separation) = -17.37%
	Incorrect Recording of Issue Detection Date	95%			X	81.30%
	Incorrect Recording of Determination Date	95%				98.26%
	UI Reporting Requirements	Pass			X	**Fail**
GPRA	Percent of Intrastate Payments Made Timely	87%				58.10%
GPRA	Detection of Recoverable Overpayments	57.5%				264.47%
GPRA	Percent of Employer Tax Liability Determinations Made Timely	90%				85.90%
RESEA	Particpant Reemployment Rate- 2nd Quarter after Program Exit	Cannot fail target for 3 consecutive years				**Fail**
Integrity Action Plan (IAP) Top Three Root Causes - Payment Integrity Information Act (PIIA) Year Data						
Work Search						
Benefit Year Earnings						
Separation Issues						
Monitoring Findings/Audit Resolution						

5. UI PROGRAM INTEGRITY ACTION PLAN (UI IAP)

The UI IAP outlines the strategies the State will undertake during the planning period regarding the prevention reduction and recovery of UI improper payments.

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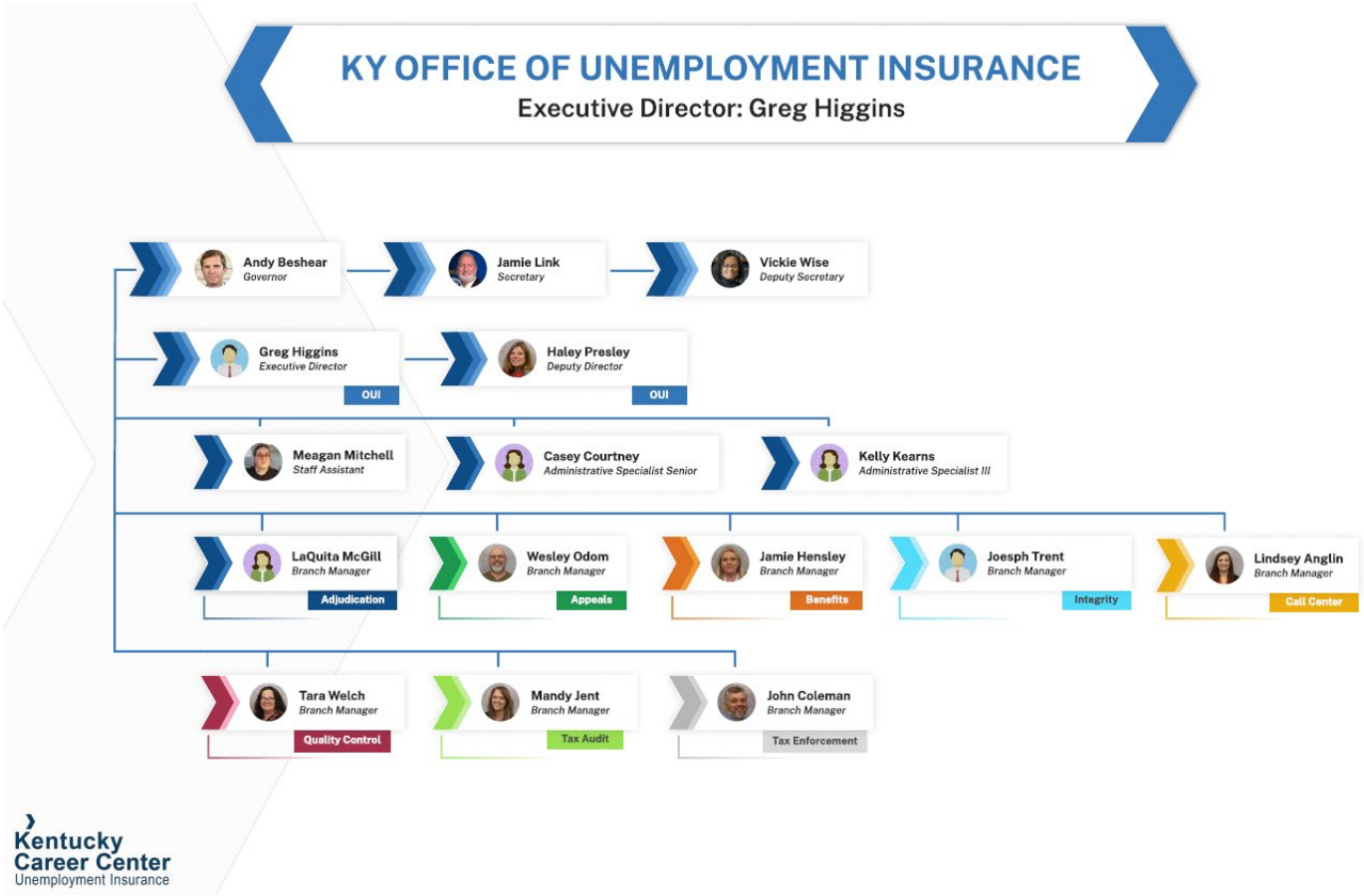
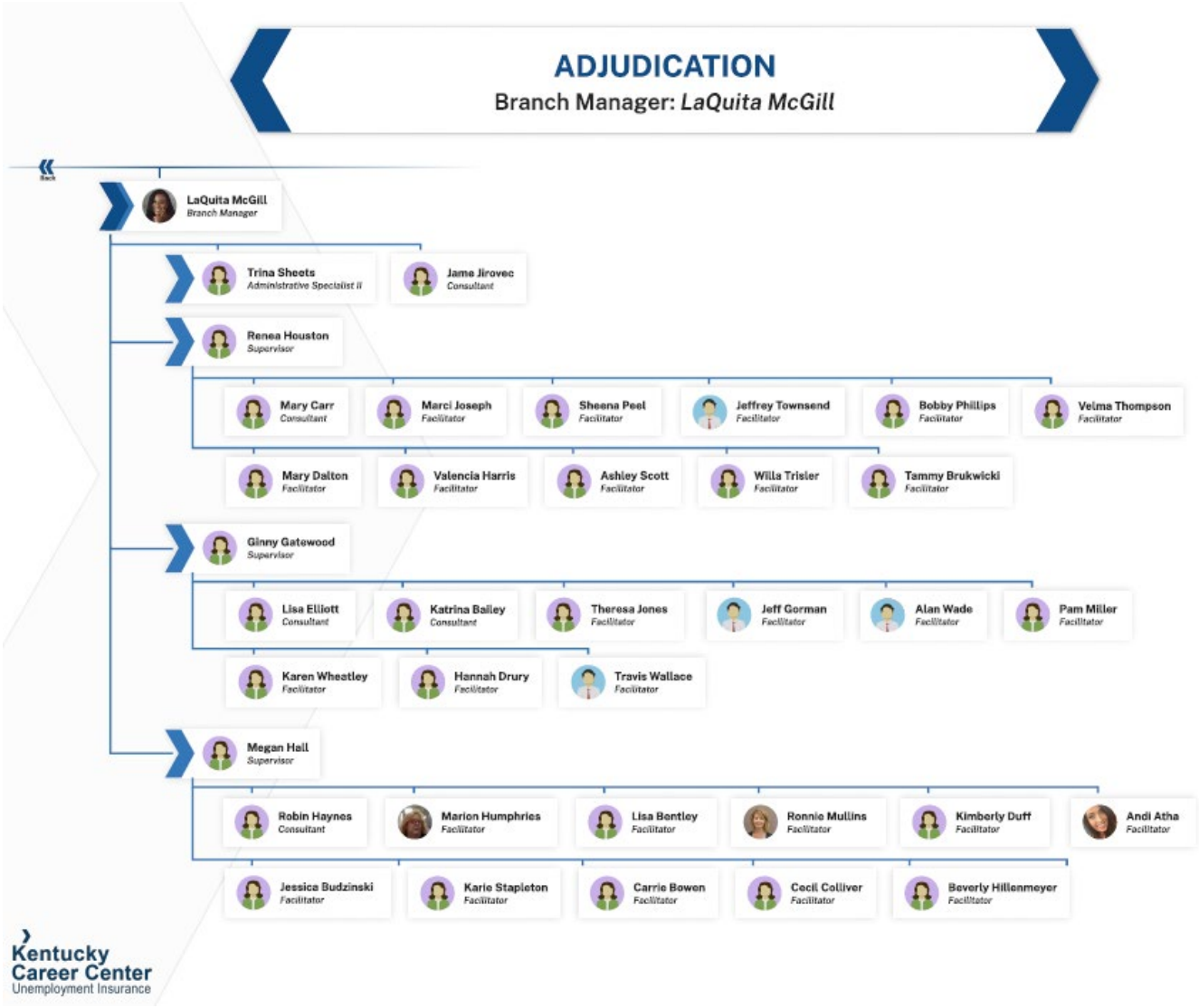
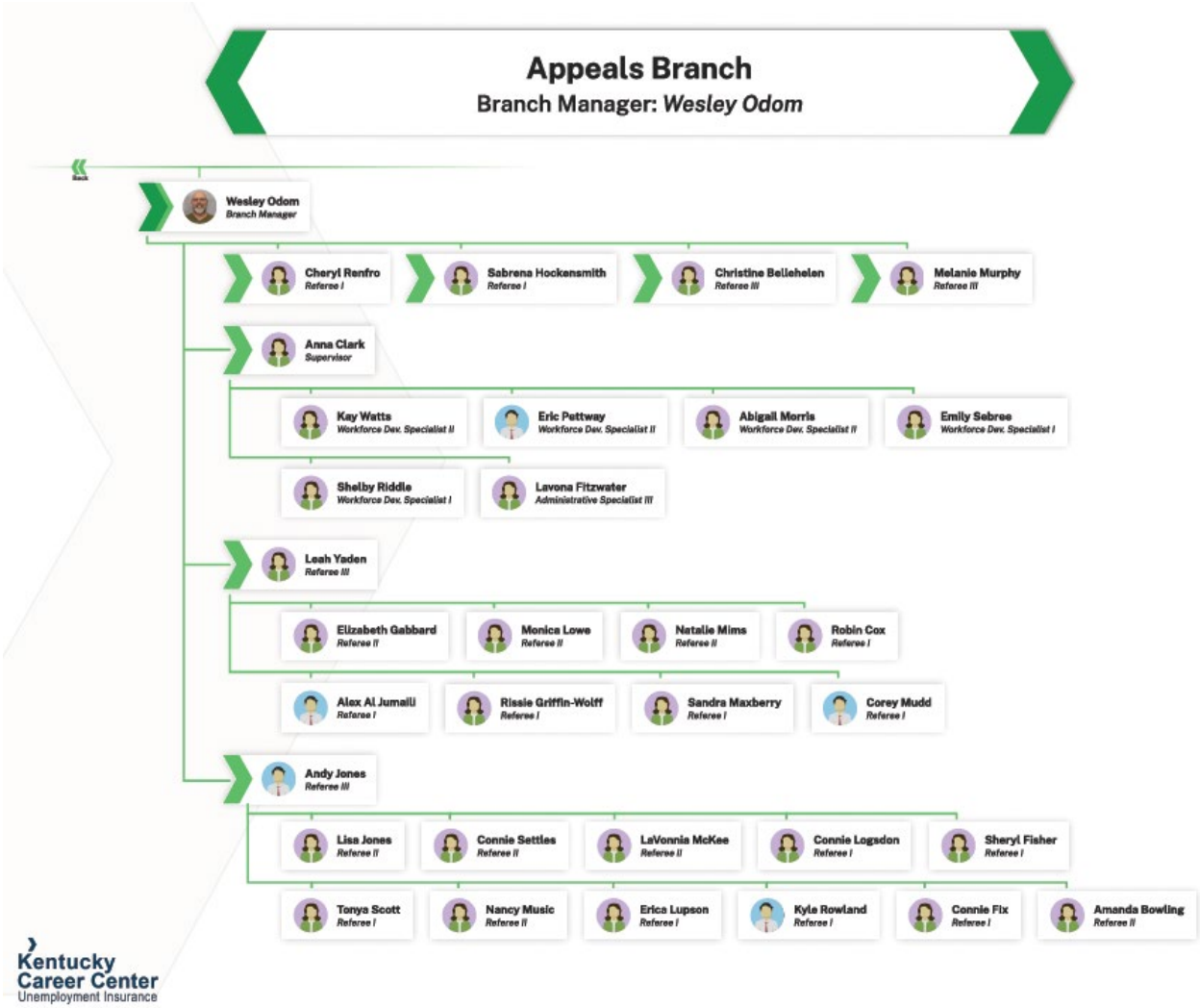
6. ORGANIZATIONAL CHART

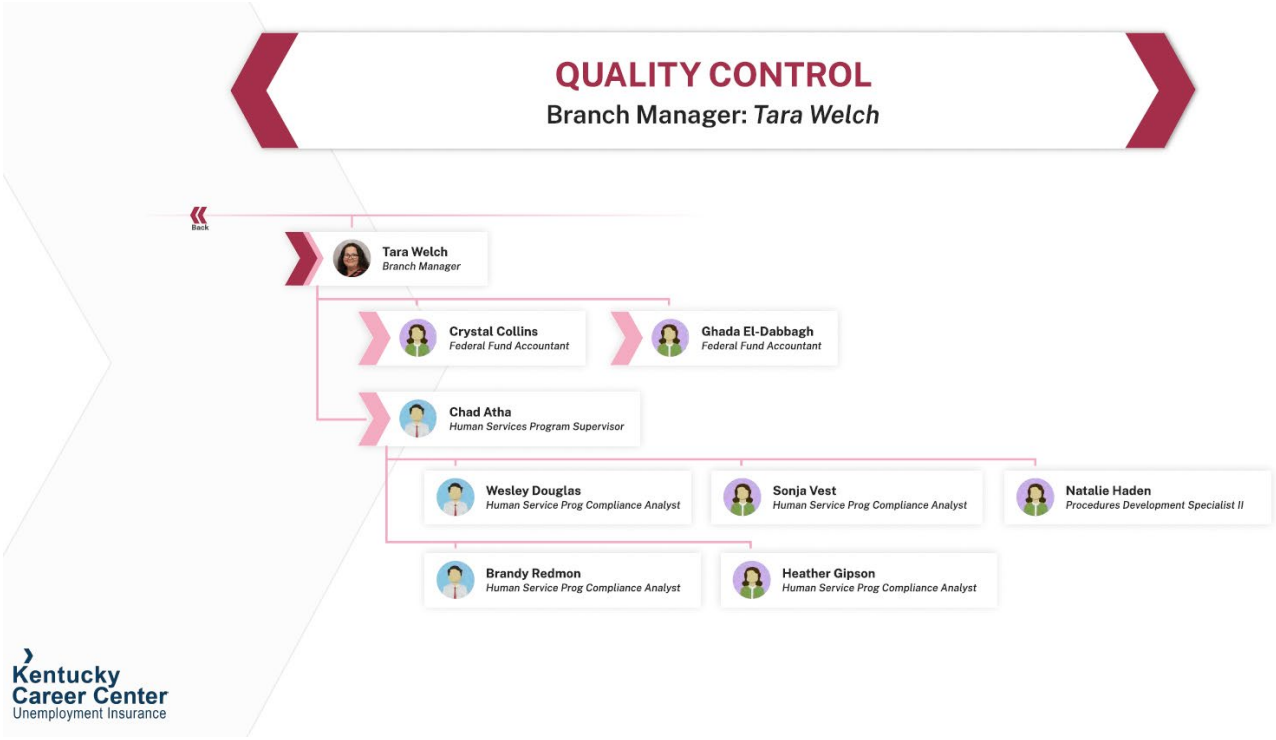
The organization chart must conform to the requirement for delivery of service through public employment offices, or such other designated providers as the Secretary may authorize; show the State's configuration from the Governor of the State down to the point of Employment Service and UI customer service delivery; and provide sufficient detail to show each organizational unit involved and the title of the unit manager.

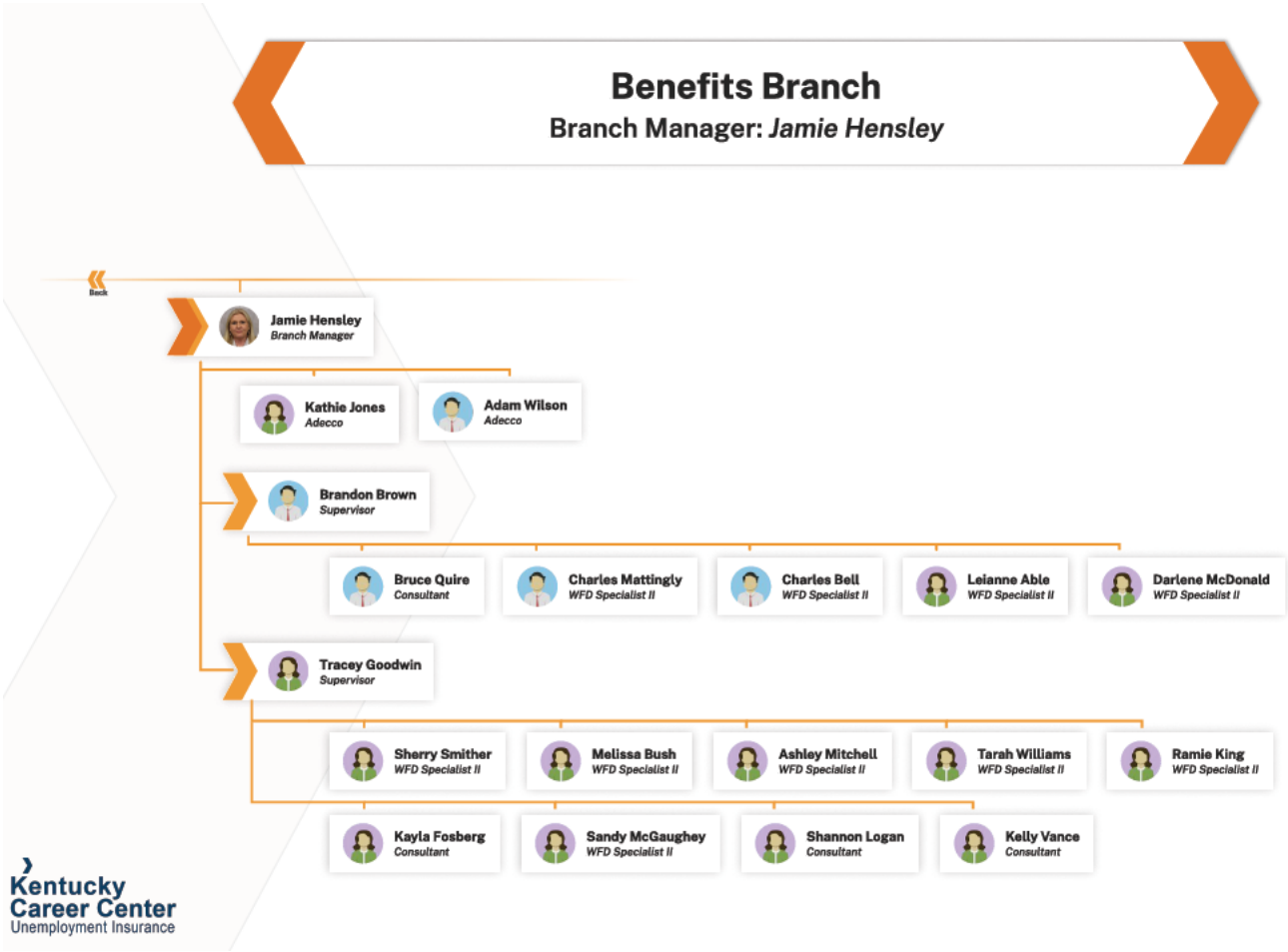
The Office of Unemployment Insurance falls within the Education and Labor Cabinet which reports to the Executive Administration of the Governor's Office. The Organization structure of the Office of Unemployment Insurance within the Education and Labor Cabinet is as follows:

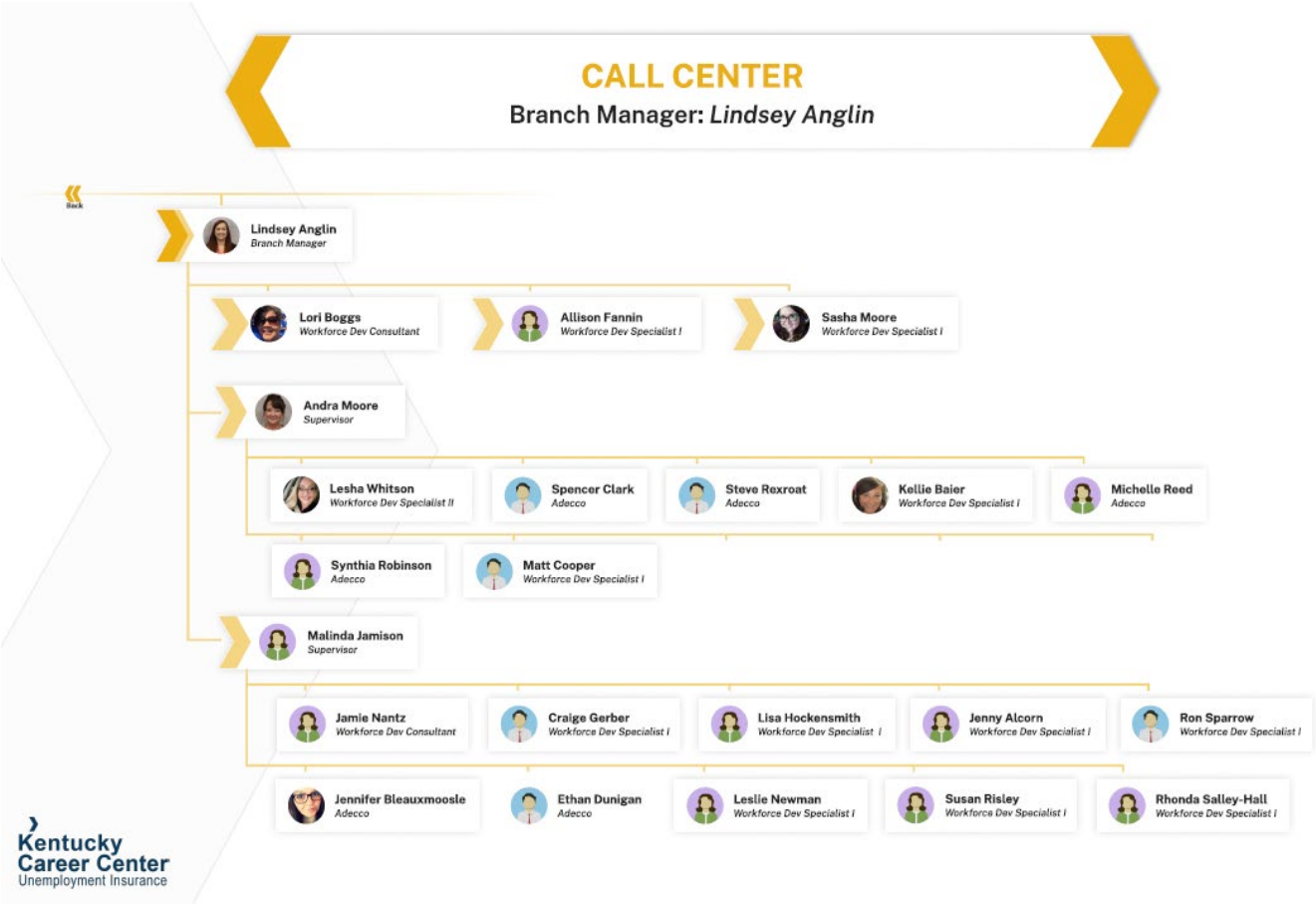

KY OFFICE OF UNEMPLOYMENT INSURANCE
Executive Director: Greg Higgins
Andy Beshear
Governor
Jamie Link
Secretary
Vickie Wise
Deputy Secretary
Greg Higgins
Executive Director
OUI
Haley Presley
Deputy Director
OUI
Meagan Mitchell
Staff Assistant
Casey Courtney
Administrative Specialist Senior
Kelly Kearns
Administrative Specialist III
LaQuita McGill
Branch Manager
Adjudication
Wesley Odom
Branch Manager
Appeals
Jamie Hensley
Branch Manager
Benefits
Joesph Trent
Branch Manager
Integrity
Lindsey Anglin
Branch Manager
Call Center
Tara Welch
Branch Manager
Quality Control
Mandy Jent
Branch Manager
Tax Audit
John Coleman
Branch Manager
Tax Enforcement
Kentucky
Career Center
Unemployment Insurance


ADJUDICATION
Branch Manager: LaQuita McGill
LaQuita McGill
Branch Manager
Trina Sheets
Administrative Specialist II
Jame Jirovec
Consultant
Renea Houston
Supervisor
Mary Carr
Consultant
Marci Joseph
Facilitator
Sheena Peel
Facilitator
Jeffrey Townsend
Facilitator
Bobby Phillips
Facilitator
Velma Thompson
Facilitator
Mary Dalton
Facilitator
Valencia Harris
Facilitator
Ashley Scott
Facilitator
Willa Trisler
Facilitator
Tammy Brukwicki
Facilitator
Ginny Gatewood
Supervisor
Lisa Elliott
Consultant
Katrina Bailey
Consultant
Theresa Jones
Facilitator
Jeff Gorman
Facilitator
Alan Wade
Facilitator
Pam Miller
Facilitator
Karen Wheatley
Facilitator
Hannah Drury
Facilitator
Travis Wallace
Facilitator
Megan Hall
Supervisor
Robin Haynes
Consultant
Marion Humphries
Facilitator
Lisa Bentley
Facilitator
Ronnie Mullins
Facilitator
Kimberly Duff
Facilitator
Andi Atha
Facilitator
Jessica Budzinski
Facilitator
Karie Stapleton
Facilitator
Carrie Bowen
Facilitator
Cecil Colliver
Facilitator
Beverly Hillenmeyer
Facilitator
Kentucky
Career Center
Unemployment Insurance

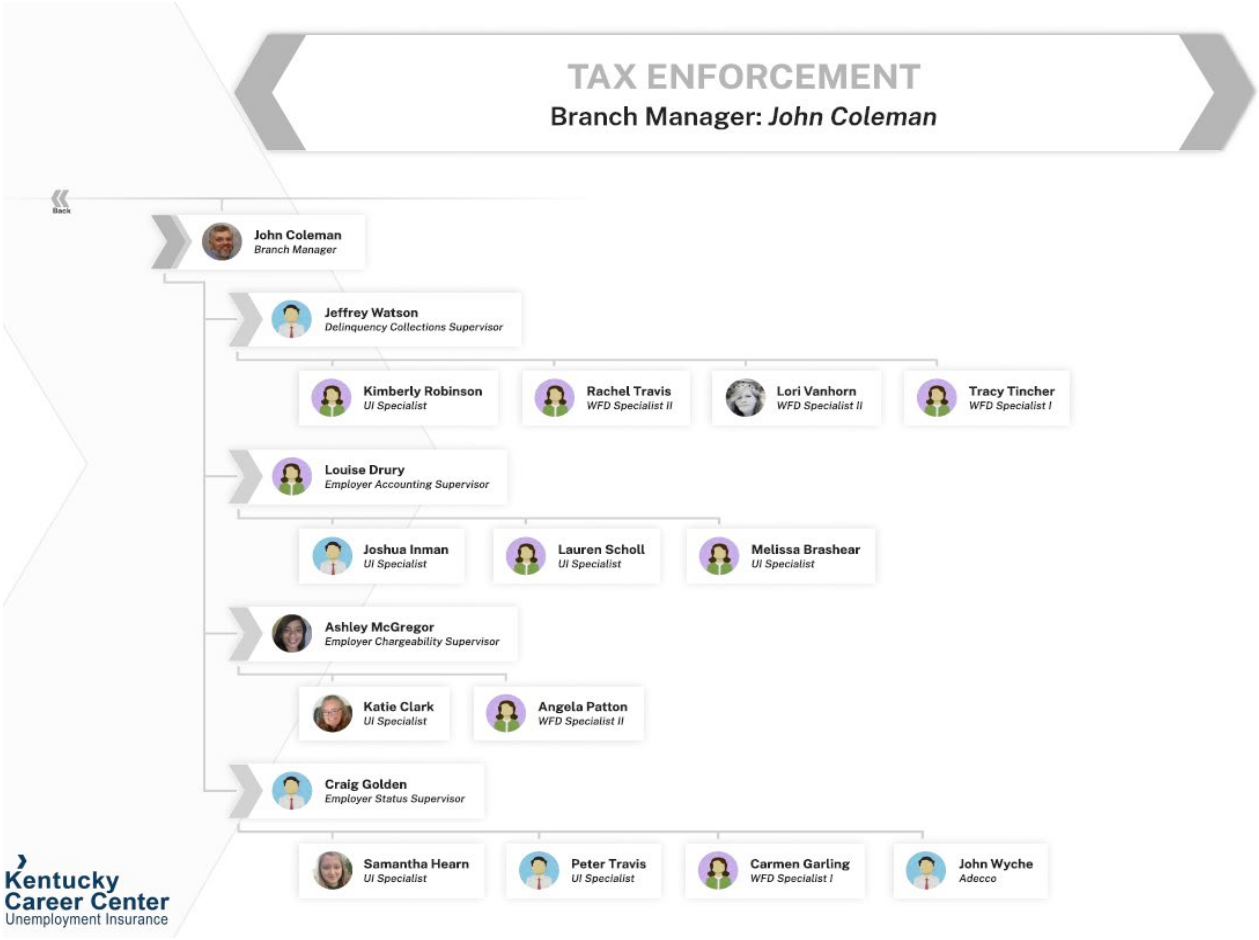

Appeals Branch
Branch Manager: Wesley Odom
Wesley Odom
Branch Manager
Cheryl Renfro
Referee I
Sabrena Hockensmith
Referee I
Christine Bellehelen
Referee III
Melanie Murphy
Referee III
Anna Clark
Supervisor
Kay Watts
Workforce Dev. Specialist II
Eric Pettway
Workforce Dev. Specialist II
Abigail Morris
Workforce Dev. Specialist II
Emily Sebree
Workforce Dev. Specialist I
Shelby Riddle
Workforce Dev. Specialist I
Lavona Fitzwater
Administrative Specialist III
Leah Yaden
Referee III
Elizabeth Gabbard
Referee II
Monica Lowe
Referee II
Natalie Mims
Referee II
Robin Cox
Referee I
Alex Al Jumaili
Referee I
Rissie Griffin-Wolff
Referee I
Sandra Maxberry
Referee I
Corey Mudd
Referee I
Andy Jones
Referee III
Lisa Jones
Referee II
Connie Settles
Referee II
LaVonnia McKee
Referee II
Connie Logsdon
Referee I
Sheryl Fisher
Referee I
Tonya Scott
Referee I
Nancy Music
Referee II
Erica Lupson
Referee I
Kyle Rowland
Referee I
Connie Fix
Referee I
Amanda Bowling
Referee II
Kentucky
Career Center
Unemployment Insurance

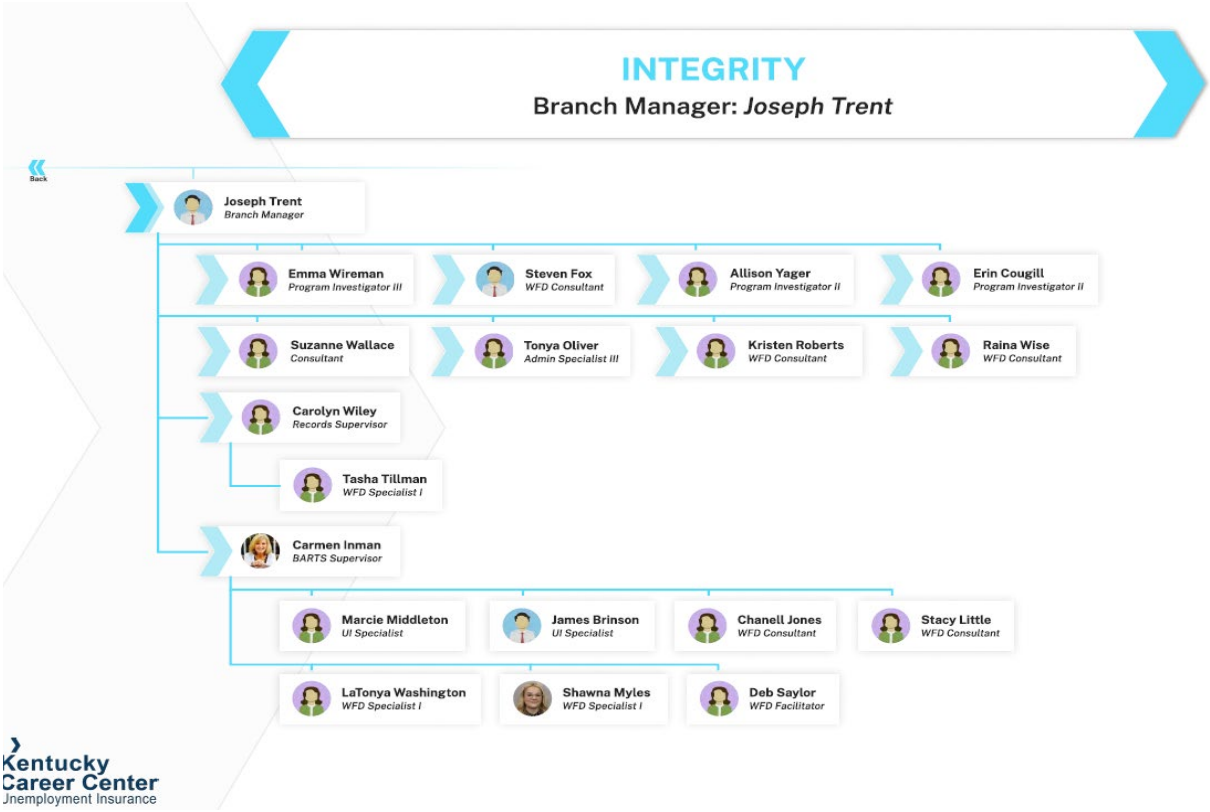

QUALITY CONTROL
Branch Manager: Tara Welch
Back
Tara Welch
Branch Manager
Crystal Collins
Federal Fund Accountant
Ghada El-Dabbagh
Federal Fund Accountant
Chad Atha
Human Services Program Supervisor
Wesley Douglas
Human Service Prog Compliance Analyst
Sonja Vest
Human Service Prog Compliance Analyst
Natalie Haden
Procedures Development Specialist II
Brandy Redmon
Human Service Prog Compliance Analyst
Heather Gipson
Human Service Prog Compliance Analyst
Kentucky
Career Center
Unemployment Insurance


Benefits Branch
Branch Manager: Jamie Hensley
Back
Jamie Hensley
Branch Manager
Kathie Jones
Adecco
Adam Wilson
Adecco
Brandon Brown
Supervisor
Bruce Quire
Consultant
Charles Mattingly
WFD Specialist II
Charles Bell
WFD Specialist II
Leianne Able
WFD Specialist II
Darlene McDonald
WFD Specialist II
Tracey Goodwin
Supervisor
Sherry Smither
WFD Specialist II
Melissa Bush
WFD Specialist II
Ashley Mitchell
WFD Specialist II
Tarah Williams
WFD Specialist II
Ramie King
WFD Specialist II
Kayla Fosberg
Consultant
Sandy McGaughey
WFD Specialist II
Shannon Logan
Consultant
Kelly Vance
Consultant
Kentucky
Career Center
Unemployment Insurance


CALL CENTER
Branch Manager: Lindsey Anglin
Back
Lindsey Anglin
Branch Manager
Lori Boggs
Workforce Dev Consultant
Allison Fannin
Workforce Dev Specialist I
Sasha Moore
Workforce Dev Specialist I
Andra Moore
Supervisor
Lesha Whitson
Workforce Dev Specialist II
Spencer Clark
Adecco
Steve Rexroat
Adecco
Kellie Baier
Workforce Dev Specialist I
Michelle Reed
Adecco
Synthia Robinson
Adecco
Matt Cooper
Workforce Dev Specialist I
Malinda Jamison
Supervisor
Jamie Nantz
Workforce Dev Consultant
Craige Gerber
Workforce Dev Specialist I
Lisa Hockensmith
Workforce Dev Specialist I
Jenny Alcorn
Workforce Dev Specialist I
Ron Sparrow
Workforce Dev Specialist I
Jennifer Bleauxmoosle
Adecco
Ethan Dunigan
Adecco
Leslie Newman
Workforce Dev Specialist I
Susan Risley
Workforce Dev Specialist I
Rhonda Salley-Hall
Workforce Dev Specialist I
Kentucky
Career Center
Unemployment Insurance

TAX AUDIT
Branch Manager: Mandy Jent
Back
Mandy Jent
Branch Manager
Jared Meadors
Area 1 Supervisor
Melissa Beasley
Auditor
Sydney Ewing
Auditor
Bryan Johnson
Auditor
Andrew Shaw
Auditor
Shauna Cannada
Auditor
Kaitlyn Fraley
Auditor
Cristy Broughton
Auditor
Jeff Brown
Auditor
Stuart Reed
Area 2 Supervisor
Neil Conkel
Auditor
Courtney Wills
Auditor
Angela Rice
Auditor
Anita Hopper
Auditor
Josiah Mullins
Auditor
Joe Meadors
Auditor
Jason Elam
Auditor
Larry Daniels
Auditor
Robyn Lee
Auditor
Jennifer Eaton
Auditor
Lorie Crowe
Area 3 Supervisor
Marlene Devito
Auditor
Whitney Turner
Auditor
Cristie Corum
Auditor
Rhonda Reynolds
Auditor
Dan Miller
Auditor
Nivia Griffin
Facilitator
Mary Couchman
Area 4 Supervisor
John Oliver
Auditor
Sherri Jones
Auditor
Michelle Bindas
Auditor
Anna Watkins
Auditor
Craig Higson
Auditor
Regina Sherwood
Administrative Specialist
Kentucky
Career Center
Unemployment Insurance


TAX ENFORCEMENT
Branch Manager: John Coleman
Back
John Coleman
Branch Manager
Jeffrey Watson
Delinquency Collections Supervisor
Kimberly Robinson
UI Specialist
Rachel Travis
WFD Specialist II
Lori Vanhorn
WFD Specialist II
Tracy Tincher
WFD Specialist I
Louise Drury
Employer Accounting Supervisor
Joshua Inman
UI Specialist
Lauren Scholl
UI Specialist
Melissa Brashear
UI Specialist
Ashley McGregor
Employer Chargeability Supervisor
Katie Clark
UI Specialist
Angela Patton
WFD Specialist II
Craig Golden
Employer Status Supervisor
Samantha Hearn
UI Specialist
Peter Travis
UI Specialist
Carmen Garling
WFD Specialist I
John Wyche
Adecco
Kentucky
Career Center
Unemployment Insurance



7. SQSP SIGNATURE PAGE

The State administrator must sign and date the SQSP Signature Page. By signing the Signature Page, the State administrator certifies that the State will comply with all the assurances and activities contained in the SQSP guidelines.

Though a State needs to submit the complete SQSP package on a 2-year cycle, there are certain documents contained in the SQSP package which are required to be submitted by States annually as part of the off-year submission. The documents which are required to be submitted annually are considered a modification to the complete SQSP submitted the previous year. Since funds for State UI operations are appropriated each year, each State is required to annually submit the transmittal letter, budget worksheets, organizational chart and the signature page. The modification may also include CAPs for new identified performance deficiencies, and any required modifications to existing CAPs.

Since the UI program is a required one-stop partner, States have the option of including UI in the Combined State Plan authorized by WIOA sec. 103.

UI Signature Page as follows:

U.S. Department of Labor
SQSP SIGNATURE PAGE

OMB Control No.: 1205-0132 Expiration Date: 06/30/2027

U.S. DEPARTMENT OF LABOR Employment and Training Administration	FEDERAL FISCAL YEAR 2026	STATE KY

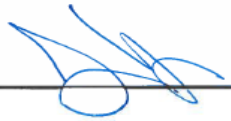
UNEMPLOYMENT INSURANCE
STATE QUALITY SERVICE PLAN
SIGNATURE PAGE

This Unemployment Insurance State Quality Service Plan (SQSP) is entered into between the Department of Labor, Employment and Training Administration, and

Kentucky Education and Labor Cabinet
(NAME OF STATE AGENCY)

The Unemployment Insurance SQSP is part of the State's overall operating plan, and, during this Federal fiscal year, the State agency will adhere to and carry out the standards set forth in Federal UI Law as interpreted by the DOL and adhere to the Federal requirements related to the use of granted funds.

All work performed under this agreement will be in accordance with the assurances and descriptions of activities as identified in the SQSP Handbook and will be subject to its terms.

TYPED NAME AND TITLE	SIGNATURE	DATE
STATE ADMINISTRATOR (Greg Higgins)		10/7/25
DOL – REGIONAL OFFICE APPROVING OFFICIAL (print name)		
DOL – NATIONAL OFFICE APPROVING OFFICIAL (print name) (if required)		

B. REQUIREMENTS FOR STATES ELECTING TO INCLUDE UI IN THE COMBINED STATE PLAN

States that elect to include UI in the Combined State Plan must:

1. SUBMIT AN SQSP IN THE FOLLOWING MANNER DEPENDING ON THEIR TIMING IN THE SQSP CYCLE:

A. IF A STATE IS IN THE FIRST YEAR OF THEIR 2-YEAR CYCLE, THE STATE IS REQUIRED TO SUBMIT THE MOST RECENTLY APPROVED COMPLETE SQSP PACKAGE. A COMPLETE SQSP PACKAGE WILL INCLUDE THE TRANSMITTAL LETTER, BUDGET WORKSHEETS/FORMS, STATE PLAN NARRATIVE, CAPS (INCLUDING THE MILESTONES

AND THE COMPLETION DATE FOR EACH MILESTONE), THE UI IAP, ORGANIZATIONAL CHART, AND THE SQSP SIGNATURE PAGE. ONE OF THE KEY GOALS FOR THE UI PROGRAM IS TO ENSURE THAT CLAIMANTS ARE ABLE TO SUCCESSFULLY RETURN TO WORK. AS SUCH, THE SQSP STATE PLAN NARRATIVE MUST PROVIDE A DISCUSSION OF THE PLAN COORDINATION WITH OTHER WIOA COMBINED PLAN PROGRAMS TO ENSURE A COORDINATED EFFORT AND INTEGRATED SERVICE DELIVERY.

We are in the 2nd year and have been providing annual information since 2021.

B. IF A STATE IS IN THE SECOND YEAR OF THE 2-YEAR CYCLE, THE STATE IS REQUIRED TO SUBMIT THE MOST RECENTLY APPROVED COMPLETE SQSP PACKAGE WITH A MODIFICATION THAT MUST INCLUDE THE TRANSMITTAL LETTER, BUDGET WORKSHEETS/FORMS, ORGANIZATIONAL CHART, AND THE SQSP SIGNATURE PAGE. THE MODIFICATION MAY ALSO INCLUDE CAPS FOR NEW IDENTIFIED PERFORMANCE DEFICIENCIES, AND ANY REQUIRED MODIFICATIONS TO EXISTING CAPS. THE CAP MUST LIST BOTH SPECIFIC MILESTONES FOR KEY CORRECTIVE ACTIONS OR IMPROVEMENT ACTIVITIES, AND THE COMPLETION DATE FOR EACH MILESTONE.

We are in the 2nd year and have been providing annual information since 2021.

2. SUBMIT THE REQUIRED OFF-YEAR SQSP COMPONENTS AS A MODIFICATION TO THE COMBINED STATE PLAN ON THE SAME CYCLE AS THE REGULAR SQSP PROCESS WHICH MUST BE APPROVED BY SEPTEMBER 30TH EACH YEAR

We are in the 2nd year and have been providing annual information since 2021.

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.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - 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 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	73.0%		75.0%	

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Fourth Quarter After Exit)	74.0%		76.0%	
Median Earnings (Second Quarter After Exit)	7,100.0		7,500.0	
Credential Attainment Rate	73.0%		75.0%	
Measurable Skill Gains	55.0%		60.0%	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - 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 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	76.0%		78.0%	
Employment (Fourth Quarter After Exit)	76.0%		78.0%	
Median Earnings (Second Quarter After Exit)	8,500.0		9,000.0	
Credential Attainment Rate	72.0%		74.0%	
Measurable Skill Gains	70.0%		72.0%	
Effectiveness in Serving Employers	Not Applicable 1	Not Applicable 1	Not Applicable 1	Not Applicable 1

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADULT, DISLOCATED WORKER, AND YOUTH ACTIVITIES - 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 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	67.0%		69.0%	
Employment (Fourth Quarter After Exit)	70.0%		72.0%	
Median Earnings (Second Quarter After Exit)	3,800.0		4,000.0	
Credential Attainment Rate	60.0%		62.0%	

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Measurable Skill Gains	50.0%		52.0%	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

WAGNER-PEYSER ACT - 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 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	63.0%		65.0%	
Employment (Fourth Quarter After Exit)	60.0%		62.0%	
Median Earnings (Second Quarter After Exit)	6,100.0		6,300.0	
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 [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

ADULT EDUCATION AND FAMILY LITERACY ACT PROGRAM - 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 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	43.50%		44.00%	

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Fourth Quarter After Exit)	47.00%		47.50%	
Median Earnings (Second Quarter After Exit)	$4,650.00		$4,700.00	
Credential Attainment Rate	41.60%		42.60%	
Measurable Skill Gains	52.50%		53.00%	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

VOCATIONAL REHABILITATION PROGRAM (COMBINED OR GENERAL) - VOCATIONAL REHABILITATION PROGRAM PERFORMANCE INDICATORS

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a % (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in

WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

Performance Indicators	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter After Exit)	65.0%		70.0%	
Employment (Fourth Quarter After Exit)	60.0%		63.0%	
Median Earnings (Second Quarter After Exit)	$9,500.00		$9,750.00	
Credential Attainment Rate	33.0%		35.0%	
Measurable Skill Gains	39.0%		40.0%	
Effectiveness in Serving Employers	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]	Not Applicable [1]

1

The Departments have not issued the final rule defining Effectiveness in Serving Employers. As a result, states will not submit expected levels of performance for this indicator and the Departments will not establish negotiated levels of performance for PYs 2024 and 2025.

Each State VR program must submit expected levels of performance in its Unified or Combined State Plan and in the two-year modification of that plan. Expected levels of performance for the first two years of a state plan must be submitted in the initial submission of the Unified or Combined State Plan and in the initial submission of the two-year modification of that Plan, for years three and four, as described in 34 CFR § 361.170(a). Expected levels of performance must be stated to the nearest tenth of a % (XX.X %) or to the nearest whole dollar for median earnings. State VR programs are reminded that the expected levels of performance must be published for public comment prior to plan submission in accordance with state law, regulation, and policy.

After the Unified or Combined State Plan submission, each State VR program must reach agreement with RSA on the negotiated levels of performance for the indicators for each of the first two years of the Unified or Combined State Plan (or for the third and fourth years of the Unified or Combined State Plan during the required two-year modification process) in accordance with WIOA section 116(b)(3)(A)(iv).

RSA will use its statistical adjustment model to derive pre-program year estimated levels of performance for each indicator. Each State VR program and RSA will consider the negotiation factors outlined in WIOA section 116(b)(3)(A)(v) during the negotiation process. Once negotiated levels of performance are agreed upon, each State VR program must incorporate the negotiated levels of performance into the Unified or Combined State Plan and the two-year modification of that plan prior to the plan's approval (section 116(b)(3)(A)(iv) of WIOA).

Effectiveness in Serving Employers

In the final rule implementing WIOA, the Departments indicated that they would initially implement this indicator in the form of a pilot to test the feasibility and rigor of three proposed approaches. During Program Year (PY) 2022, the Departments initiated the rulemaking process to establish a standard definition of Effectiveness in Serving Employers. States will continue to report two of three proposed approaches until the Departments issue the final rule and implement the indicator.

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
N/A

Additional Indicators of Performance

OTHER APPENDICES

Kentucky has identified expected levels of performance for each primary indicator of performance for the two years covered by the plan modification. We will reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education, on the negotiated levels of performance for the indicators for each of the two years of the plan modification.

The Adult, Dislocated Worker, Youth, Adult Education and Family Literacy Act and Vocational Rehabilitation programs have sufficient data available to make reasonable determinations of expected levels of performance for the following indicators for PYs 2026 and 2027:

- 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 has sufficient data available to make a reasonable determination of expected levels of performance for the following indicators for PYs 2026 and 2027:

- 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.

The Department of Labor has determined that the Effectiveness in Serving Employers (ESE) 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 approach to measuring ESE was defined in the Workforce Innovation and Opportunity Act Effectiveness in Serving Employers Performance Indicator final rule (89 FR 13814 (Feb. 23, 2024)) (Final Rule). This final rule took effect March 25, 2024, and defined the ESE primary indicator of performance, as required by WIOA section 116(b)(2), as Retention with the Same Employer.

For the PYs 2026-2027 plan modifications, the Departments used the transition authority under section 503(a) of WIOA to designate the ESE primary indicator of performance as a “baseline”

indicator. A "baseline" indicator is one for which states do not propose an expected level of performance and do not come to agreement with the Department of Labor on negotiated levels of performance because sufficient data are not available to establish such performance levels. As a result, "baseline" indicators are not used in the end of the year adjustment of performance levels and are not used to determine failure to meet adjusted levels of performance for purposes of sanctions. The Department of Labor 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.

Included below is Kentucky's expected levels of performance for the primary indicators of performance described in section 116(b)(2)(A) of WIOA. Kentucky will update its plan modification to include the agreed-upon negotiated levels of performance after final negotiation with the Department of Labor.

Title I – Adult Program

	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter after Exit)	73.0%		75%	
Employment (Fourth Quarter after Exit)	74.0%		76%	
Median Earnings (Second Quarter after Exit)	$7,100		$7,500	
Credential Attainment Rate	73.0%		75%	
Measurable Skill Gains	55.0%		60%	

Title I – Dislocated Worker Program

	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter after Exit)	76.0%		78%	
Employment (Fourth Quarter after Exit)	76.0%		78%	
Median Earnings (Second Quarter after Exit)	$8,500		$9,000	
Credential Attainment Rate	72.0%		74%	
Measurable Skill Gains	70.0%		72.00%	

Title I – Youth Program

	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter after Exit)	67.0%		69%	
Employment (Fourth Quarter after Exit)	70.0%		72%	
Median Earnings (Second Quarter after Exit)	$3,800		$4,000	
Credential Attainment Rate	60.0%		62%	
Measurable Skill Gains	50.0%		52%	

Title II – Adult Education and Family Literacy Act Program

	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter after Exit)	43.50%		44.00%	
Employment (Fourth Quarter after Exit)	47.00%		47.50%	
Median Earnings (Second Quarter after Exit)	$4,650.00		$4,700.00	
Credential Attainment Rate	41.60%		42.60%	
Measurable Skill Gains	52.50%		53.00%	

Title III – Wagner-Peyser Act Employment Service Program

	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter after Exit)	63.0%		65.0%	
Employment (Fourth Quarter after Exit)	60.0%		62.0%	
Median Earnings (Second Quarter after Exit)	$6,100		$6,300	

Title IV – Vocational Rehabilitation Program

	PY 2026 Expected Level	PY 2026 Negotiated Level	PY 2027 Expected Level	PY 2027 Negotiated Level
Employment (Second Quarter after Exit)	65.0%		70.0%	
Employment (Fourth Quarter after Exit)	60.0%		63.0%	
Median Earnings (Second Quarter after Exit)	$9,500.00		$9,750.00	
Credential Attainment Rate	33.0%		35.0%	
Measurable Skill Gains	39.0%		40.0%	

All WIOA Core Programs

	PY 2026 Expected Level	**PY 2026 Negotiated Level**	**PY 2027 Expected Level**	**PY 2027 Negotiated Level**
Effectiveness in Serving Employers	Baseline	Baseline	Baseline	Baseline

Kentucky's approved Strategic Plan can be found https://kwib.ky.gov/About/Documents/KWIB_Strategic_Plan_2020.pdf