

WIOA State Plan for the State of Vermont FY-2018

Overview

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

Options for Submitting a State Plan

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

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

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

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

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

How State Plan Requirements Are Organized

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

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

- The **Operational Planning Elements** section identifies the State's efforts to support the State's strategic vision and goals as identified in the Strategic Planning Elements section. This section ensures that the State has the necessary infrastructure, policies, and activities to meet its strategic goals, implement its alignment strategy, and support ongoing program development and coordination. Operational planning elements include:
 - State Strategy Implementation,
 - State Operating Systems and Policies,
 - Assurances, and
 - Program-Specific Requirements for the Core Programs, and
 - Program-Specific Requirements for the Combined State Plan partner programs. (These requirements are available in a separate supplemental document, Supplement to the Workforce and Innovation Act (WIOA) Unified and Combined State Plan Requirements. The Departments are not seeking comments on these particular requirements).

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

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

I. WIOA State Plan Type

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

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

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. No

Combined Plan partner program(s)

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

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

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

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

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

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

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

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

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

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

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

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

II. Strategic Elements

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

a. Economic, Workforce, and Workforce Development Activities Analysis

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

1. Economic and Workforce Analysis

A. Economic Analysis

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

i. Existing Demand Industry Sectors and Occupations

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

ii. Emerging Demand Industry Sectors and Occupation

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

iii. Employers' Employment Needs

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

Vermont is a rural state located between the large metropolitan areas of Boston, New York City and Montreal. The Vermont economy depends on a diversified mix of manufacturing, private education, healthcare, tourism, professional services and public-sector employers. Agriculture remains an important component of the state's economy and cultural image.

In northwestern Vermont, Chittenden County provides nearly one third of the state's jobs and serves as the economic hub of the Vermont economy. Burlington and South Burlington make up the core of the state's only Metropolitan Statistical Area (MSA). The area employs thousands of workers in retail, construction, manufacturing, education, healthcare and tourism industries. The MSA extends into parts of Franklin, Grand Isle and Addison counties.

Southern Vermont has worked to maintain a balance between economic development and preservation of the rural working landscape. Easy access from northeastern urban centers (Boston, New York City, etc) has put pressure on the region for second home development. In addition, ski resorts in the area have expanded to provide self-contained winter recreation facilities. The area along the Connecticut River has close ties to neighboring New Hampshire communities. The northern part of Windsor County benefits from its proximity to Hanover, New Hampshire, which employs many workers in education and health-care.

Bennington County, in the southwestern corner of the state, provides a wide range of recreation and tourist activities. It is a popular area with visitors from adjoining New York State. The county is also home to many manufacturing, retail and healthcare employers.

While central Vermont is well known because of the capital city, Montpelier, the region also contains a diverse economy with an interesting industrial history. Granite quarries provide stone for monuments and construction all over the world. Granite workers pass on a tradition of craftsmanship that turns granite slabs into works of art. In addition to its large public sector, the central Vermont area has strong insurance and financial services sectors, and many healthcare and social assistance employers.

Lamoille County in north central Vermont has a high concentration of service industry jobs related to seasonal recreation and tourism. Recent resort expansion and development has provided construction and retail jobs for the area.

Essex, Orleans and Caledonia counties in northeastern Vermont, known collectively as the Northeast Kingdom, contain some of the last remnants of a rural, undeveloped New England. The forests provide income for loggers and serve as a resource for furniture and other wood product manufacturing. Residents of the Kingdom report income levels among the lowest in the state and poverty rates among the highest. Large scale expansions at two nearby ski areas have provided a number of service-sector jobs in recent years.

GROSS STATE PRODUCT

Gross State Product (GSP) is the broadest measure of economic activity in the state. After increasing every year since 1993, GSP - the value of all final goods and services produced in Vermont - fell for three consecutive years between 2007 and 2009, during the national recession. Since this time, the over the year change in GSP has been positive. The most recent data (2016) reflects a 2.6% annual rate of growth. Service Providing industries grew by 3.5% in 2016, while Goods Producing industries contracted by 2.3%. The fastest growing industries were Educational Services (+10.6%), Administrative and Waste Services (+8.5%) and Arts, Entertainment and Recreation (+6.8%). Industries that experienced contraction were Agriculture, Forestry, Fishing and Hunting (-7.9%), Mining (-12.3%), Manufacturing (-3.3%) and Utilities (-16.2%). Private Ownership grew by 2.4%, while Government Ownership grew by 3.6%.

ECONOMIC TRENDS

Between 2010 and 2016 the Vermont economy added 14,881 jobs, an increase of 5.1%. Over this six-year period ten counties reported job gains, led by Chittenden which added 8,343 jobs or 8.9%. The largest percent increase was in Lamoille where the number of jobs increased by 10.9% or 1,163. Counties that saw a decline in jobs over the period include Caledonia (-2.1%), Essex (-11.5%), Grand Isle (-3.4%) and Rutland (-1.0%).

In 2016 the number of jobs in Vermont increased by 873 (0.3%) to 307,969 as the state and national economy continued to expand after the December 2007 recession. Statewide, the private ownership goods-producing sector of the economy declined by 811 jobs (-1.7%) while the service sector increased by 1,600. Government employment increased by 83 jobs or 0.2%.

The largest employment gains in 2016 were in Health Care & Social Assistance (+780) and Administrative & Waste Services (+368). On a percentage basis the largest gains were in Administrative & Waste Services (+3.2%) followed by Arts, Entertainment & Recreation (+2.8%).

Manufacturing employment continued to decline, losing 952 jobs or 3.2%. Durable Goods Manufacturing was responsible for 927 of those jobs, while nondurable goods contributed 25 jobs to the decline. Other sectors with significant employment declines included Utilities (-205) and Management of Companies & Enterprises (-135).

Construction continues to be an important part of the Vermont economy. This industry was hit hard during the December 2007 recession, but has slowly recovered in recent years. Between 2015 and 2016, construction employment increased by 96 jobs or 0.6% to a statewide level of 15,273. Despite this improvement, the state is still short of the industry peak level of employment reached in 2006 of 17,334.

The latest agriculture statistics come from the 2012 Census of Agriculture. The number of hired agricultural workers increased by 10.5% between 2007 and 2012. Over this same time period Vermont's farm acreage increased by 1.5%. Chittenden County experienced the greatest increase in hired workers - increasing by nearly two-thirds during the five-year period. Four of Vermont's fourteen counties experienced decreases in agricultural products sold, while milk from cows sold increased in all counties. Dairy farming still dominates the state's agricultural sector and contributes to its non-durable goods manufacturing sector.

Total Vermont wood production stood at 135,876,000 board feet in 2015, a decrease of 0.9% over 2014. Hardwood production increased by 10.5% statewide. This increase was offset by a 6.6% decrease in softwood production. Windham County is the largest producer of

wood forest products, accounting for 12.1% of all Vermont hardwood and 17.3% of softwood. Franklin and Grand Isle combined produce the smallest amount of wood product statewide.

Taxes

Personal Income taxes amounted to just over 655 million dollars in 2015, the latest available data at the time of this report. In 2016 the Sales & Use tax generated just over 287 million dollars. Rooms and Meals taxes generated 160.4 million dollars, while the Property Transfer tax generated 35.1 million dollars.

Local property taxes fund municipal expenses, road maintenance and local education. A statewide property tax is the foundation of education financing in the state. For the purposes of education funding, all real property is classified as either homestead or nonresidential. A statewide education tax is imposed on these two classes of property at different rates. The homestead education tax rate in each municipality depends upon the local per pupil spending. Both the homestead and nonresidential education tax rates are adjusted by the local common level of appraisal of the property.

HOUSING

The number of primary residences sold in Vermont in 2016 was 6,834, an increase of 361 from the previous year, but well below transaction activity in 2005 (9,312 units). The statewide median price of a primary residence was \$205,000 in 2016, an increase of 4.1% from the previous year. This figure includes all types of single-family dwellings including mobile homes. Chittenden County had the highest median price at \$275,000, up from \$230,000 in 2005 and \$270,000 in 2016. The three southernmost counties in the state - Bennington, Windham and Windsor - were the only three to report declines in median sale price between 2010 and 2016.

The number of annual vacation home sales stood at 1,418, in 2016, a slight decline from 2010's 1,493. The median sale price for these properties decreased by \$8,000 to \$205,000. Between 2010 and 2016, the median sale price of vacation homes increased in Chittenden, Essex, Franklin, Grand Isle, Lamoille, and Orange. It declined in all other counties.

B. Workforce Analysis

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

i. Employment and Unemployment

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

ii. Labor Market Trends

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

iii. Education and Skill Levels of the Workforce

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

iv. Skill Gaps

Describe apparent 'skill gaps'.

The Vermont labor force grew steadily at the start of the new millennium, culminating at an all-time high in April of 2009. For the early part of the decade (2000-06), job creation mirrored growth in the labor force. However, due to a global economic downturn starting in December of 2007, Vermont witnessed a divergence in job creation and labor force participation. The differential resulted in increased unemployment, in which Vermont's unemployment rate peaked at 7.0% in 2009.

LABOR FORCE

Resident Civilian Labor Force ¹	2016	2015
Civilian Labor Force	344,900	345,500
Employed	333,650	333,100
Unemployed	11,250	12,350
Unemployment Rate (%)	3.3%	3.6%

The statewide unemployment rate predominately followed a downward trend in the years after 2009. During 2016, the state unemployment rate improved slightly, falling by a tenth of a percentage point to a seasonally-adjusted 3.2% (December 2016). The comparable national rate fell by two tenths of a percentage point to 4.7%.

EMPLOYMENT BY INDUSTRY

Industry	% of		% of		Percent	
	2016	Total	2015	Total	Change	Change
Total Covered	307,969	100.0%	307,096	100.0%	873	0.3%
Private Ownership	254,927	82.8%	254,137	82.8%	790	0.3%
Goods Producing	49,129	16.0%	49,940	16.3%	-811	-1.7%
Agriculture, forestry, fishing & hunting	3,237	1.1%	3,185	1.0%	52	1.6%
Mining	639	0.2%	646	0.2%	-7	-1.1%
Construction	15,273	5.0%	15,177	4.9%	96	0.6%
Manufacturing	29,980	9.7%	30,932	10.1%	-952	-3.2%

		% of		% of		Percent
Durable Goods	18,753	6.1%	19,680	6.4%	-927	-4.9%
Non-Durable Goods	11,227	3.6%	11,252	3.7%	-25	-0.2%
Service Providing	205,797	66.8%	204,197	66.5%	1,600	0.8%
Wholesale trade	9,467	3.1%	9,298	3.0%	169	1.8%
Retail trade	38,115	12.4%	37,894	12.3%	221	0.6%
Transportation & warehousing	6,515	2.1%	6,564	2.1%	-49	-0.8%
Utilities	1,343	0.4%	1,548	0.5%	-205	-15.3%
Information	4,629	1.5%	4,630	1.5%	-1	0.0%
Finance and Insurance	8,705	2.8%	8,746	2.8%	-41	-0.5%
Real estate & rental & leasing	2,971	1.0%	2,962	1.0%	9	0.3%
Professional & technical services	14,316	4.6%	14,214	4.6%	102	0.7%
Management of companies & enterprises	2,083	0.7%	2,218	0.7%	-135	-6.5%
Administrative & waste services	11,357	3.7%	10,989	3.6%	368	3.2%
Educational services	10,197	3.3%	10,017	3.3%	180	1.8%
Health care & social assistance	50,869	16.5%	50,089	16.3%	780	1.5%
Arts, entertainment, & recreation	4,254	1.4%	4,134	1.3%	120	2.8%
Accommodation & food services	31,983	10.4%	31,938	10.4%	45	0.1%
Other services, except public administration	8,992	2.9%	8,955	2.9%	37	0.4%
Government Ownership	53,042	17.2%	52,959	17.2%	83	0.2%

POPULATION

The 2010 United States Census confirmed a slow rate of growth in the population of Vermont. Since 2000, Vermont's population grew by 2.8% over the ten-year period between censuses, an annual growth rate of less than 0.3%. Comparatively, the United States grew by 9.7% in nominal terms over the same ten-year period.

Vermont's population continues to show a slower rate of growth than the nation. According to the Vermont Department of Health, Vermont's population was 626,042 in 2015, a decline of 520 people over the year and an increase of just 301 people since the 2010 decennial census.

The stagnant population growth can be seen in more detail at the county level. From 2014 to 2015, half (7) of Vermont's counties experienced population gains. Population gains were primarily concentrated in the northwest corner of the state: Chittenden (+851), Franklin (+157), Lamoille (+153) and Addison (+26) all experienced growth. Orange (+40), Essex (+38) and Orleans (+18) also experienced growth. The largest population declines were concentrated in the southern half of the state where Washington county declined by 386, Rutland by 350, Windham by 328, Windsor by 277 and Bennington by 128. As a percentage of population, the largest increase between 2014 and 2015 was +0.6% in both Essex and Lamoille counties. The largest decline was -1.9% in Grand Isle.

Burlington is the state's largest city, with a 2015 population of 42,252. Burlington is also the center of the state's only Metropolitan Statistical area, the Burlington-South Burlington MSA.

The next three largest communities are also part of the Burlington - South Burlington MSA. Essex's population of 20,946 makes it the second largest town, followed by South Burlington (18,791) and Colchester (17,383). Rutland's population of 15,824 makes it the largest town outside of the MSA and outside of Chittenden County. It is followed by Bennington (15,345) and Brattleboro (11,679).

The most striking population statistics involve the aging of Vermont. The state has one of the oldest populations in the nation. Between 2014 and 2015, the age cohort with the largest increase was individuals 65+. This cohort increased by 3,694 people or 3.5%. The only other cohorts that grew over the year were 55-64 years of age (+521, 0.5%) and 20-34 years of age (+679, 0.6%).

The Northwest part of the state has a smaller percentage of older adults. Chittenden County has the lowest proportion of residents 65 years of age or older (11.3%). Franklin has the second lowest at 12.2%, followed by Lamoille (13.3%) and Grand Isle (14.0%). Essex (19.3%) and Bennington (18.8%) have the largest proportion of residents 65 years of age and over.

Unemployment

After increasing to 7.0% during the most recent recession, the unemployment rate fell steadily for many years. The annual statewide unemployment rate fell from 4.0% in 2014 to 3.6% in 2015. It fell again to 3.3% in 2016. This level consistently places Vermont among states with the lowest unemployment rates in the nation. Across the counties, unemployment in 2016 ranged from 2.5% in Chittenden County to 5.9% in Essex County. The unemployment rate fell in every Vermont county between 2015 and 2016.

Wages

The average annual wage in Vermont rose to \$45,059 in 2016, an increase of 1.9% over 2015 levels. Wages continue to be higher in Chittenden County, where the average annual wage was 14.2% higher than the statewide average. Washington County's average annual wage is 7.2% higher than the state average. The only other county to have an average wage above the statewide average was Addison at 0.2% higher.

Average annual wages ranged from a high of \$51,464 in Chittenden County to a low of \$32,779 in Grand Isle County. Average wages are influenced by the mix of industries and occupations in an area and other economic factors such as the proportion of part-time and seasonal jobs. Although they may pay a competitive hourly wage, part-time and seasonal jobs would lower the annual average compared to a full-time job, all else equal.

Vermont's per capita income stood at \$48,587 in 2015, a 4.7% increase from 2014. Per capita income is equal to total personal income divided by total resident population. It is a broader measure of financial well-being than wages because it includes various non-wage items such as dividends, rents and government transfer payments. Income is based on the resident population, while the average wage is reported by the employer paying the wages.

EDUCATION

Vermont school enrollment has been declining since 1997. In the 2015-2016 school year (SY), Vermont's high schools had a combined enrollment of 23,145, a decline of 114 students from 2014-15. High school enrollment figures by county reflect the school age population data by county. Dropout rates, an average over the latest four school years, vary widely across schools - from a 0.0% rate for Chelsea, Craftsbury, Danville, Black River and Rochester to a 35.6% rate for Winooski. Overall, the statewide dropout rate for high school students averaged 9.2% for the four-year period ending in SY 2015-6.

The average student-teacher ratio in Vermont was 10.4 in SY 2015-16. Student-teacher ratios ranged from 6.9:1 in Hartford to 15.1:1 in Bellows Falls.

Thirty-seven percent of students statewide were performing at a level of Proficient or above (Levels 3 & 4) in math in 2015-2016. An equal 37% were performing Substantially Below Proficient (Level 1).

In Science, 30% were Proficient or above, while 28% were Substantially Below Proficient. 58% of students performed at a level of Proficient or above in reading and 18% were Substantially Below Proficient.

2. Workforce Development, Education and Training Activities Analysis

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

A. The State's Workforce Development Activities

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

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

III. WORKFORCE DEVELOPMENT, EDUCATION AND TRAINING ACTIVITIES ANALYSIS

In Vermont, workforce development activities under the WIOA are performed by the Vermont Department of Labor (Title I & III), Agency of Education (Title II), and Agency of Human Services (Title IV).

Core Partner: VERMONT DEPARTMENT OF LABOR (VDOL)

VDOL's Workforce Development Division offers Vermont businesses and employees comprehensive services. For businesses, we offer job registration into our Vermont Job Link system, applicant searches, screening and job matching, hiring events, job fairs, current labor market information, programs for interns, apprentices and OJTs, tax credits, programs for layoff avoidance, rapid response services, short-term compensation programs, grants for job training for new and incumbent workers, and assistance with employment and labor law questions. For job seekers, services include skill assessment, skill training, labor market information, career counseling, and job placement assistance. VDOL serves all Vermonsters.

WIOA basic and career services are provided, with programs focusing on at-risk out-of-school youth, disadvantaged adults, and dislocated workers under Title I. The Wagner-Peyser Program under Title III provides all customers with employment services, labor market information, referrals to job opportunities, workshops and occupational skills development activities. Augmenting Title I and III services are the apprenticeship, migrant seasonal farm worker, Jobs for Veteran Services and SNAP and ABAWD employment programs.

All services are provided through the 12 American Job Centers (Career Resource Centers) operated by the VDOL throughout the State. VDOL also operates as the State's One-Stop Operator in addition to administering the following federal programs:

1. Youth. VDOL provides intensive case management, paid and unpaid support services, and follow-up services for one full year after a youth exits. Additionally, VDOL places youth in work experiences, summer employment opportunities, and on-the-job training, as appropriate. Work based activities that have academic and occupational education as a component are integral to VDOL's youth program design.
2. Adult. The adult program is open to all individuals 18 years of age and older with priority given to veterans and individuals who are low income, recipients of public assistance, and those who are basic skills deficient. The program provides career services to individuals ranging from basic labor exchange information to more individualized career coaching, occupational skills development and work based employment opportunities such as on-the-job training. The provision of a range of occupational skills pathways and employment based activities assists participants in gaining and/or retaining employment that will lead to economic self-sufficiency. VDOL will continue to identify specific labor market needs in order to create and expand occupational credentialing through stackable training opportunities with a variety of entrance points for adult participants.
3. Dislocated Worker. VDOL's dislocated worker program offers employment and training programs for eligible workers who are unemployed through no fault of their own or have received an official layoff notice. A description of the full range of services available through the one-stop system and how services can be accessed is made available to dislocated workers. An initial assessment including a basic review of the individual's work history, skills, training, education, career objective, and self-identified service needs is used to inform decisions on next steps such as scheduling additional career services. The program provides similar re-employment and training activities as the adult program. The driving emphasis is placed on providing timely intervention and immediate assistance to laid off individuals unlikely to return to the occupation they came from. Shepherding displaced workers through an assortment of timely and relevant training activities that lead to in demand occupations is paramount to the program's success.
4. Wagner-Peyser. The Wagner-Peyser funds support employment services for job seekers and business customers in the Vermont's American Job Center Network. The Vermont Network physically embodies the required coordination of core and local partner program services, as all programs are present at these locations across the State, and is operated under the concept of universal accessibility. Title III funds support State staff, facilities, and information technology needed for partner program delivery at the American Job Centers and for improving the overall capacity of the workforce development system to match labor demand with labor supply. These funds are directed as necessary to best support the system and to most efficiently fulfill Federal mandates. Vermont's AJC's provide activities that support the development of a competitive workforce, including appropriate recruitment services and special technical services for employers. Vermont's AJC's work with all individuals and other job seekers to obtain critical job search, assessment, and career guidance services that support them in obtaining and retaining employment. In addition, AJC's offer activities that assist employers with building skilled, competitive workforces through recruitment assistance, employment referrals, and other workforce solutions. AJC staff also

assist in developing and disseminating regional workforce information and related resources, which provide both job seekers and employers with comprehensive and accessible economic and industry data to inform workforce and economic development activities.

VDOL is working to establish more comprehensive "business needs" programs, teaming up with employers, chambers, regional workforce development and investment boards, trade associations, training and education partners, state agencies, SBDC, the Agency of Commerce/Department of Economic Development, and others to support small business and offer technical assistance and support for existing businesses. Assistance can range from providing technical assistance on programs, guiding them to resources, assisting with labor law explanation and compliance, helping with job development, advertising and recruitment for their vacancies, and assisting with specialized needs.

5. One-Stop Partnership. Vermont successfully executed its One-Stop MOU in July of 2017, amending it to include an infrastructure funding agreement in January 2018. All of the required programs are co-located, either physically or virtually, and staff have begun more locally-based cross-training between programs. VDOL has begun to a collaborative process to establish a joint referral system. The entire MOU will be renegotiated for July 1, 2018.

Core Partner: AGENCY OF EDUCATION

1. Adult Education and Literacy (AEL). AEL programs serve adults who are 16 years old or older and not enrolled in school, and who lack a high school diploma or an equivalent, or lack equivalent skills; or who are English language learners. Instruction is provided from the lowest skill level in adult basic education to adult secondary education, as well as English to speakers of other languages in the basic skills of reading, writing, math, and speaking/listening.

The purposes of the program are to assist individuals to increase their academic skills, to obtain a high school diploma or GED, to obtain employment, and to successfully enter post-secondary education or training. Services are funded by federal and state grants awarded to eligible agencies via open funding competitions.

Under WIOA, the Agency of Education funds four non-profit educational organizations to provide services in every county via full-service adult learning centers and additional satellite offices. AEL students develop and engage in a personalized learning plan, with career exploration included as a central component. Variable levels of instructional intensity are available to students, dependent on their skill level and specific educational needs. AEL instruction is offered in applied contexts and the programs are flexible to accommodate learners' barriers to persist in their studies (e.g., evening hours, group and individual instruction). Students are eligible to earn a regular high school diploma from their town of residence through the flexible and innovative Vermont High School Completion Program. Students who come to adult education with a 9th grade equivalent in skills take, on average, 18 months to earn their high school diploma. Alternatively, students have the option of preparing to earn a GED certificate, which has been revised to align with the Vermont Common Core State Standards. The GED is a useful educational option for some adult learners, as completing a computer-based test requires that they have developed basic technology skills.

Core Partner: VERMONT DIVISION OF VOCATIONAL REHABILITATION (DVR)

1. Vocational Rehabilitation. DVR provides employment services for individuals with disabilities in order to offset barriers to their employment. DVR serves individuals with any disability, with the exception of people with visual disabilities who are served by the Division for the Blind and Visually Impaired (DBVI). Services provided by DVR are highly individualized and can include a wide range of activities as long as they support an employment goal. After a determination of eligibility, DVR and the consumer develop an Individual Plan for Employment (IPE) which outlines the employment goal, the services to be provided, and the responsibilities of the consumer. A consumer is determined to have achieved an employment goal when they have been employed a minimum of 90 days and are stable on the job.

While all DVR services are highly individualized, DVR has developed some specific programs and initiatives to better meet workforce needs. Creative Workforce Solutions (CWS) DVR uses a dual customer approach that promotes meeting the needs of both employers and consumers. DVR's primary interface with the business community is through its business outreach program called Creative Workforce Solutions. CWS consists of 13 Business Account Managers housed in twelve Agency of Human Services' Districts, who coordinate with local employer outreach teams. DVR funds or partners with over 200 community non-profit staff who provide placement services for individuals with disabilities. Employer outreach by these providers is coordinated through the CWS Business Account Managers.

2. Pre-Employment Transition Services (PETS). In order to meet the requirements of PETS, DVR has established a cadre of fourteen VR counselors assigned to work exclusively with students in high school. Each counselor has an assigned Youth Employment Specialist to develop real work-based learning experiences. DVR has the capacity to provide PETS services for eligible students in all 60 supervisory unions. Supported Employment for Youth and Adults DVR partners with the Division of Developmental Services and the Department of Mental Health to provide supported employment services for adults with developmental disabilities and youth with emotional behavioral disabilities.

3. Rehabilitation Services for the Deaf (RCD). DVR has four Rehabilitation Counselors for the Deaf to provide specialized employment services to adults and students who are deaf or have hearing impairments.

4. Work Incentive and Benefits Planning. Approximately 30% of individuals in the DVR caseload receive Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI). Individuals on SSDI or SSI often need assistance understanding and managing the effects of earned income on their benefits. DVR Benefits Counselors provide this guidance to beneficiaries and assist them in taking advantage of available work incentives.

5. Short Term Industry Recognized Training. DVR data has indicated that consumers who complete industry recognized short-term certification programs achieve higher wage employment outcomes. DVR therefore sets aside a portion of the overall case service budget for consumers interested in these training programs

5. Progressive Employment. Progressive Employment allows individuals to make incremental steps towards employment through graduated experiences. These experiences range from job shadows and company tours to On the Job training agreements. DVR makes extensive use of work experiences in competitive settings to assist individuals in building their skills and gaining real work experience. Progressive Employment is also an excellent tool for employers to get to know potential employees before committing to a hire.

Core Partner: VERMONT DIVISION FOR THE BLIND AND VISUALLY IMPAIRED (DBVI)

1. Specialized Services. The DBVI provides specialized services for people who are blind or visually impaired using a rehabilitation model that starts when the person experiences vision loss. DBVI offers an array of services specifically designed for people who have lost visual function and independence. Given appropriate adaptive skills training and assistive technology instruction, many limitations due to

blindness can be overcome. Quality of life, employment, dignity, and full integration are the focus of the program. DBVI practices a rehabilitation model that takes a holistic approach to working with the individual at the time of vision loss.

The process begins with the individual and the DBVI Counselor working together to develop an Individualized Plan for Employment in order to achieve their highest level of independence and employment as possible. DBVI services help people reestablish control and ability to complete independent living tasks necessary to access employment and the community. The overall goal is to help individuals gain economic independence by obtaining satisfying, well-paying jobs. This is accomplished through specialized instruction to build adaptive skills related to blindness and by building employment skills through vocational training and higher education.

An individual has achieved an employment goal when they have been employed a minimum of 90 days and are stable on the job. Vocational Rehabilitation Services The goal of DBVI's vocational rehabilitation services is to help people with vision loss to retain, return, or secure employment. Each individual meets with a DBVI counselor to identify goals and develop a plan to reduce the limitations that result from a vision loss.

2. Transition Services. DBVI transition services provide high school students with opportunities for learning independent living and job skills. DBVI collaborates with several partners including the Division of Vocational Rehabilitation, Vermont Associates for the Blind and Visually Impaired (VABVI), Vermont Youth Conservation Corps, ReSource, and the Gibney Family Foundation. One specific transition program called LEAP (Learn, Earn, and Prosper) provides paid summer employment for youth in a residential setting. This program empowers students to take charge of their employment future by gaining early employment success that can be carried into future employment pursuits. The goal is for all graduates to enter college, obtain future training, or join the world of work. A new addition to the summer work experience is the requirement for students to secure internships in their local community. The goal of the internships is to make connections in the local community where jobs will eventually develop and to expand a summer experience into year-long career exploration. LEAP has completed its seventh successful year.

3. Technology. Maximizing the power of assistive technology is critical to people with vision loss. DBVI invests significant effort in staying current about new assistive technology, which will revolutionize employment access and eliminate other barriers caused by vision loss. Assistive technology plays a critical role in allowing an individual with a visual impairment to be connected with society, continue employment, and pursue a tremendous range of careers in mainstream society.

DBVI's customer satisfaction is its strength. These ratings consistently exceed 90% each year. Staff are described as responsive, easy to reach, and helping people meet their goals. Comments at each of the four Town Meetings acknowledged that DBVI staff and services "gave them hope." Individuals who experience vision loss need to learn new adaptive skills, and DBVI strategies are designed to help people build these skills. In most situations, assistive technology is the key to opening the door for employment. Specialized software and hardware are often needed to access print, and specialized skills, including the use of specialized magnification and lighting, are needed to use the technology successfully. The combination of technology and the skills to use the technology helps individuals return to their jobs and community activities. Our customers have used work experiences as a way to show employers that they can do the job. Many employers cannot conceive of how a blind person can do a particular job, until they learn that some simple, low cost accommodations make it possible. This is also a great opportunity for people to build employment skills and to learn about jobs they like or don't like. DBVI also makes a strong commitment to help individuals succeed in post-secondary and vocational training programs. These degrees and certificates usually lead to better paying jobs. For students, DBVI's process involves strong communication with a team including the student, family, school staff, and teachers of people with visual impairments. Each DBVI counselor guides students and teams to develop specific action steps depending on the path they will take toward either more training or directly into work. Our role is to help students make a smooth individual transition into the world of work.

One-Stop delivery system partners provide services through the Burlington American Job Center (AJC) as follows: All of the required career services and programs and activities carried out by one-stop partners are available at the Burlington AJC through walk-in appointments, scheduled one-on-one appointments, group orientations, and self-service resources. Where appropriate, partners who provide the same career services deliver those services in a coordinated manner and involve the One-Stop Operator in the design of the process as needed. At least one Title I staff person is physically present during regular business hours and customers have access to all programs, services, and activities described in this section. "Access" means that a program staff member or a staff member from a different program who is appropriately trained, is physically present at the Burlington AJC, or a direct connection via phone or real-time Web-based communication is available at the Burlington AJC to connect a customer with a program staff member who can provide information or services to the customer, within a reasonable time. In addition, some programs are coordinating delivery of services both in and outside of the Burlington AJC. The following list provides some examples of inter-program service delivery collaboration: • Local adult education staff attend AJC group orientations and other information sharing meetings with job seekers and other clients, as appropriate, to describe services available through adult education. Adult education staff meets with individual clients at the AJC by appointment to facilitate access to services. Local adult education centers also make space available on at least a bi-weekly, half-day basis for partner staff to meet with co-enrolled clients. • DBVI provides vocational rehabilitation services to individuals who are blind or visually impaired through Blind Services Counselors in four regional offices, available by referral and appointment. • Participants in the Senior Community Service Employment Program (SCSEP) receive eligibility determination, supportive service referrals, and enrollment assistance at local Mature Worker Resource Centers (several of which are co-located with American Job Centers in VT). "On-site" training services are received at nonprofit partner locations in the general community, and "off-site" training services are received either virtually or at the facilities local training providers (community colleges, local libraries, etc.). • The Unemployment Insurance (UI) program offers virtual services through a direct connection to the VDOL UI Claims Center for initial claims and online access to file additional claims. RESEA services are offered directly through the Burlington AJC through a dedicated full-time staff member. • Burlington AJC intake specialists are trained by CVOEO on their Micro-Business Program and Community Kitchen Academy. Staff can assist customers in connecting with these programs through a specially arranged referral system. • The Vermont Educational Opportunity Center program is a Federal TRIO program at VSAC with full statewide reach for adults looking to improve their employability. Through individual counseling and group workshops in the Burlington AJC, other career resource centers, and other community locations, participants receive assistance through career exploration activities, financial aid and admission applications, and postsecondary enrollment. Staff are available at the Burlington AJC and co-located at many other career resource centers. • Economic Services staff trains VDOL staff to screen for Reach Up/3SquaresVT eligibility and makes off-site Economic Services staff available to accommodate an immediate referral via Skype. • AJC staff are oriented to the CCV and VTC brochures and degree/certificate program listings; websites; contact information for admissions personnel so that they may assist customers in appropriate outreach. • A VR counselor is on-site in the Burlington AJC part time on a regular basis. When a counselor isn't present, referrals are made via Skype where customers are provided with an overview of services and given the date of the next orientation to VR 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) above.

Strengths of Workforce Development Activities Vermont sees the following as strengths to the workforce development system in the state:

- **Intimate, Individualized Services** — core partner programs are highly accessible to individuals and program participants would rarely encounter wait times in program centers across the state. Additionally, the state has highly ranked education and training programs. For example, DVR has been ranked number one nationally in per capita individuals served, in employment per capita outcomes achieved, and in access to services for individuals with the most severe disabilities and determined eligible for Social Security disability benefits based on Ticket to Work participation rates.
- **Strong Employer Engagement** — The state workforce programs have a strong emphasis on the employer as a customer. These business services come through engagement with businesses, economic development partners, and community organizations and leaders. The DVR, through CWS has over 2,500 active employer accounts in a Salesforce Strong database. Additionally, the core partners have successful employer engagement opportunities such as the Vermont Tech Jam, an annual career fair/tech expo showcasing the state's most tech and bioscience companies, which provides a unique matchmaking opportunity for tech-based employers and job seekers.
- **Program Accessibility** — Core partner programs are already available statewide. Additionally, many required one-stop partners are already collocated within the twelve state career resource centers, including the following programs: unemployment, trade adjustment, jobs for veterans, wagner peyser, and registered apprenticeship. Because of the collocation of wagner-peyser services, all career resource center staff receive labor market information training that enables better informed services to program participants and information seeking customers.
- **Education Opportunities** — There are 27 colleges and universities in Vermont, including one research university, five universities conferring master's degrees, an art school, a culinary school, a law school, and 14 undergraduate colleges conferring associate's and bachelor's degrees. These colleges are considered national leaders and this has resulted in a net positive migration of college-age people into Vermont.

B. Challenges of Workforce Development Activities Vermont sees the following as challenges to the workforce development system in the state:

- **Rural Landscape** — although workforce programs are highly accessible, some areas of the state still suffer from a lack of physical and technological infrastructure that makes serving these populations more difficult. Additionally, outside of the larger municipalities, it can be difficult to amass populations with a common need and focus. Economic variable and job opportunities differ in each small region. The question of going to scale becomes a challenge.
- **Population Demographics** — As mentioned above, Vermont's population is aging and in some estimates declining. Although Vermont has one of the highest high school graduation rates, U.S. Census reports about 55,000 residents, over the age of 25, without a high school diploma. Additionally, many participants are seeking entry level employment.
- **Coordination and Collaboration** — Communication largely stems from personal relationships. However, state agencies and private sector organizations largely administer workforce development programs without coordination, common standards, or adequate measures of success.
- **Maintaining a Skilled Workforce** — According the Vermont's 2014 CEDS report, many employers in the state have difficulty recruiting individuals from outside the state due to: (1) a narrow range of employment alternatives; (2) a shortage of satisfactory employment opportunities for spouses; (3) a shortage of available and affordable housing; and (4) a relatively high cost of living compared with wages. Additionally, many graduates of the state's colleges move to other states to take advantage of job opportunities and, in some cases, to return to their home state or region.

C. State Workforce Development Capacity

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

Vermont core partners have been successful in providing their individual services to Vermonters. This is evidenced by the recognition of our programs and the positive customer feedback from program participants. Examples include the national rankings of the DVR program services, the 95 percent overall customer satisfaction of the DBVI participants.

Despite the individual successes of Vermont's core partner programs, the State faces demographic shifts and funding constraints that constrain the Vermont workforce development system in further meeting the needs of Vermont businesses, employers, employees, and job seekers.

While the Vermont workforce development system still has silos, our small size and status as a single-region state has helped improve connections between the partner programs under WIOA. We've expanded coordination and collaboration and are coming together to ensure every Vermonter has the chance to be economically successful.

Vermont is still looking to expand capacity to develop and implement innovative partnerships that better leverage the offerings of each program. As we mature into the operation of our one-stop centers and network, we expect to discover opportunities to do this, that aren't apparent at this point in time.

b. State Strategic Vision and Goals

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

1. Vision

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

The State's strategic vision is to create a workforce development system that is a highly visible and accessible network of programs and strategies designed to increase employment, retention, and earnings for all Vermonters.

This system will meet the skill requirements of employers, enhance the productivity, competitiveness and life circumstances for all Vermonters, and result in an improved, diverse, and quality economy.

The State's guiding principles in administering this vision are:

- 1) The workforce system will support the workforce needs of all Vermonters, recognizing and addressing the unique needs of those with barriers to employment. The system will operate on the premise that any individual who wants to work, can work, given the right support.
- 2) Employers will be both leaders and partners in the design, development and implementation of the workforce development system. The workforce development system must be sufficiently flexible and responsive to meet the workforce needs of Vermont employers.
- 3) Sustained employment is the only viable route out of poverty for low income Vermonters. Therefore, the workforce development system will support pathways that lead to and can exceed a livable wage.
- 4) Partners within the workforce development system will rely on the best available labor market information when making policy decisions, in order to ensure that Vermonters are being placed in the best position possible to succeed in the Vermont economy.

2. Goals

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

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

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

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

WIOA UNIFIED STATE PLAN: GOALS AND STRATEGIES

Goal 1: Maximize equitable access to workforce development services through a seamless, coordinated delivery system that provides a quality, consistent experience for any jobseeker or Vermont employer.

Strategy A: Maintain an inventory of all workforce and education training opportunities across state government and community partners.

- Identify areas of duplication and potential inefficiencies across all partners to focus efforts and message effectively.
- Maximize the successful participation of all Vermonters in available education and training programs leading to employment or advancement in employment.

Strategy B: Align core programs and develop cross training of staff at all levels, including:

- Inter-agency training to ensure all staff are familiar with each other's programs.
- Training to recognize, address, and resolve implicit bias and stereotypes to ensure access to all Vermonters.

Strategy C: Increase focused communication among all service delivery points and partners. This will include:

- Development of common intake and joint referral processes.
- Exploring strategies for further co-location, driven by local needs.

Strategy D: Hold a regular series of workforce development summits or conferences, at least once per year, in order to:

- Foster existing statewide network relationships.
- Discuss best practices happening statewide and nationally.

—Identify areas of improvement and create action plans to assess gaps and leverage resources.

Goal 2: Connect individuals to the training and supports they need to enter an occupation and progress on career pathways resulting in a livable wage.

Strategy A: Develop effective approaches to connect those living in poverty to the workforce development system. This will include:

- The expansion of existing, and development of new, partnerships with state agencies and community programs serving those with the highest economic need and those individuals with barriers to employment, including people with disabilities, new Americans, women in poverty, displaced homemakers, people who are homeless, offenders, lower-skilled adult learners, and Vermonters in recovery.
- Partnership with the Department for Children and Families (DCF) to provide adult education and workforce services for Temporary Assistance to Needy Families (TANF) beneficiaries, non-custodial parents who owe child support, and Able-Bodied Adults Without Dependents (ABAWDs).
- Partnerships with state agencies and community programs serving youth who are at-risk and living in poverty, including youth with emotional behavioral disabilities served through the JOBS program.

Strategy B: Expand workforce development and training initiatives and programs for Vermonters in high-demand and high-wage jobs. This will include:

- The development and expansion of sector-based training programs.
- The development and expansion of apprenticeships training, certification programs, and industry recognized credentials in high demand sectors.
- The development and expansion of state-endorsed Career Pathways in target sectors, beginning in middle school and culminating in a variety of credentials, degrees and employment outcomes at both the secondary and postsecondary levels.
- Ensuring Career Pathways have entrance points for lower-skilled adults that connect to adult education programs with outreach specific to this population.

Strategy C: Explore opportunities to address disincentives to work built into state and federal benefits programs, such as Social Security Disability Insurance (SSDI) or TANF.

- Seek federal waivers to test alternative benefit structures and work incentives to make work pay.
- Promote state policy adjustments designed to incentivize employment for individuals who receive public benefits.

Strategy D: Utilize the Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) grant as comprehensive pilot to experiment on how the workforce system can serve beneficiaries effectively.

- The SNAP E&T grant is a partnership between Vermont DCF, Vermont Department of Labor (VDOL), Division of Vocational Rehabilitation (DVR) and Community College of Vermont to provide comprehensive return to work services for beneficiaries who are recent offenders, have substance abuse disorders, and/or are homeless. The partnership will test new strategies to support return to work for these populations who have significant barriers to employment.

Goal 3: Strengthen the Vermont economy by working with state and private partners to make data-driven changes that increase the number of workers employed in the skilled trades, STEM fields, advanced manufacturing and other Vermont priority sectors, including non-traditional or under-represented populations.

Strategy A: Regularly collect, analyze, and report on labor market, workforce development, and training data by gender.

Strategy B: Work with Vermont State agencies, departments and community partners to identify and support education, training, or economic development initiatives to reduce occupational segregation in priority sectors.

Strategy C: Support employer efforts to improve gender balance in priority sectors.

Strategy D: Work with 7-12 education, Career Technical Education (CTE), postsecondary education and employer sectors to ensure that student personalized learning plans are informed by broad exposure to a full range of careers, including non-traditional careers for women.

Goal 4: Ensure all students who graduate from high school are able to pursue and complete post-secondary education, training, apprenticeships or career opportunities, with the education and skills necessary to keep Vermonters competitive in the economic sectors critical to the Vermont economy.

Strategy A: Support emergent partnerships among K-12, including Career and Technical Education, adult education, higher education, employers, state agencies and other workforce development partners, in order to:

- Establish and promote Career Pathways, focusing on priority pathways and in-demand industries and occupations.
- Establish transition to post-secondary education and training programs in all regions to prepare underskilled out-of-school youth and adult learners for successful entry into and progress within post-secondary education and training programs within a career pathway.
- Connect skills learned in school with their application in the workplaces of the future; become a resource for students and schools in addressing Personalized Learning Plans and other career aspirations.
- Reach out to youth who are leaving school to engage them in workforce development opportunities, specifically WIOA youth and adult activities.
- Maximize effectiveness of the Pre-Employment Transitions Services (PETS).

Goal 5: Align the workforce development system to the needs of employers, as well as job seekers, through systematic and ongoing engagement and partnership.

Strategy A: Establishment of protocols for VDOL and DVR to coordinate outreach and candidate referral to employers.

Strategy B: Promote the coordination of services from VDOL and DVR offered to employers to support a successful placement.

Strategy C: Expand existing and develop new joint VDOL and DVR marketing and outreach efforts to the employer community. This may include:

- Jointly sponsored career fairs and business recognition events.
- Regular meetings between VDOL and DVR employment staff to share contacts and local outreach activities.

Strategy D: Expand partnerships with the local workforce development leaders to identify skill gaps and develop training programs to meet the staffing needs of local businesses.

Strategy E: Expand the use of work experiences (progressive employment; on-the-job-training (OJT), internships, pre-apprenticeship, etc.) to help job seekers build skills that meet the local employer workforce demand.

Strategy F: Ensure that K-12 and Adult Education and Literacy providers are aware of State workforce needs, high-priority industries and employment sectors, and sectors with high employer demand so that they may incorporate this information into their ongoing work on personalized learning plans and career development with adult learners.

 **Text Box:** GOAL 6: Expand Vermont's labor force by helping more Vermonters enter the labor market and relocating out-of-state workers to meet employer's needs.&10;&10;

Strategy A: Education and employment service delivery providers will increase attention to at-risk youth, ex-offenders, individuals in recovery, and other individuals with barriers to employment to support their initial, continuing, and extended participation in the labor market.

Strategy B: Work to retrain and retain older workers in the labor force after traditional retirement or temporary exit from the workforce.

Strategy C: Working with VDOL, ACCD and Tourism and Marketing to create strategies to convert visitors, tourists, out of state college students and Vermonters living outside of the state to full time residents and workers.

3. Performance Goals

Using the table provided in Appendix 1, include the State's expected levels of performance relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) of WIOA. (This Strategic Planning element only applies to core programs.)

4. Assessment

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

The State Workforce Development Board (SWDB) and its Operating Committee will assess and monitor the effectiveness of Vermont's workforce development system in addressing the State's vision and goals. The SWDB will carry out its assessment by requiring the core partners to provide frequent updates on their programs' progress in implementing the specific strategies for realizing Vermont's vision and goals. The required frequency and the content of these updates is determined by the SWDB, taking into account any potential duplication with other performance reporting obligations for programs, given that Vermont is a single-area state and the SWDB also functions as the Local WDB. The SWDB may develop and maintain a reporting dashboard tool to optimize the collection and analysis of the data.

The VDOL's Economic and Labor Market Information Division will provide labor market information to the SWDB, so that they may evaluate the larger and longer-term impacts of the plan. On a smaller, more immediate scale, a customer-centered survey will be developed, administered, and collected so that the effectiveness of the one-stop delivery system from the perspective of its participants may be taken into account. The Committees that carry out the monitoring will include business representatives in order to ensure that the business and industry community's perspective is also reflected in the assessment.

Based on these various reports and updates, the SWDB will identify opportunities for improvement, and convene partners and stakeholders to share information and develop strategies to remedy the identified challenges. The core partners will then realign their approaches to implementing the State's vision and goals, and in turn contribute to ameliorating the overall effectiveness of Vermont's workforce development system.

The actual measures to assess the effectiveness of Vermont's workforce system will be established by the SWDB in order to address the State's strategic vision to create a workforce development system that is a highly visible and accessible network of programs and strategies designed to increase employment, retention, and earnings for all Vermonters. This system will meet the skill requirements of employers, enhance the productivity, competitiveness and life circumstances for all Vermonters, and result in an improved, diverse, and quality economy.

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).

Vermont's workforce system is intentionally inclusive, providing education & training opportunities, services, and supports that lead to secure employment for all Vermonters. Leaders in government, business, education, workforce training and social programs are committed to ensuring equal and greater opportunity for all Vermonters. To advance the goal of an equitable and inclusive workforce and economy, Vermont prioritizes programs and initiatives that close gender, employment and education gaps, and build pathways to employment for women, minorities, persons with disabilities, low-income and at-risk youth and adults, mature workers, persons with barriers to employment and those who have been marginalized or under-valued through biases in the system or its administration. Jobseekers need the skills and training that will enable them to achieve their personal career goals as well as sustain employment during periods of economic downturn.

The workforce development system directs its resources to support programs that align with the business community's hiring needs and the state's occupational projections and priority sectors. Vermont's current priority sectors are (1) manufacturing (2) health care (3) construction and (4) tourism. These were identified in Vermont's CEDS report. The Agency of Education, Department of Labor, and Department of Economic Development align their grant opportunities with these sectors to maximize return on investment. Further the Agency of Education sequences the development of career pathways with these priority sectors as well.

Vermont's WIOA plan is in clear alignment with the postsecondary attainment goal and strategy discussions taking place over the past two years with support from a Lumina Foundation State Policy Academy Grant. A diverse group of stakeholder representatives including Vermont's Agency of Commerce and Community Development, Department of Labor, Agency of Education, employer representatives, K-12 and higher education leaders recommended the goal that by 2025, 70% of Vermont's working age adults will possess postsecondary degrees or credentials of value.

Among the populations identified by the working group as in need of additional state strategies to support attainment are the over 60,000 working-age Vermonters with some college education but no degree or credential of value, and first-generation, low-income Vermont high school students. Only 37.3% of economically disadvantaged high school graduates continue on to college, and the gap in postsecondary continuation rates between first-generation and non-first-generation students exceeds 20% in 8 of Vermont's 14 counties, with overall rates for male first-generation youth the lowest of any subpopulation.

Developing clear career pathways from technical education programs through credentials and degrees in Vermont's priority economic development sectors, and awarding credit for prior knowledge and employment-based education, are two of the top strategies identified by the working group for further development. The Agency of Education is taking the lead on career pathway development and is entering its second year with a high-level position coordinating this work from middle-school through post-secondary.

Vermont's Labor Market Information Division (LMI) is currently preparing region-specific reports for each of Vermont's 16 regional technical education centers, supplying localized data and analysis about industry, occupational trends and projections, labor force supply, and training information. This information will be shared at regional meetings across the state where the data will be presented, and businesses, industry, education, adult training, higher education, and adult learning stakeholders will have an opportunity to respond, prioritize, and begin planning their updated approaches to meeting localized or community need.

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 Core Partners and the One-Stop required and non-required partners are committed to providing comprehensive, high-quality, customer-centered services to Vermonters. Vermont is committed to, a comprehensive one-stop delivery system and is in the process of developing a work group to focus on a Customer-Centered Design (CCD) of the One Stop to deliver services to meet the needs of all customers and maximize seamless accessibility and availability of services. This requires each partner to become familiar with each other's programs and services to ensure that a customer has all tools available to him or her, regardless of where he or she enters the workforce development system. In order to facilitate this, the partners are committed to the following activities to align services to individuals:

1. cross training,
2. common referral, and
3. better communication.

In order to ensure Vermonters have access to all available services, each partner participating in cross training opportunities to familiarize staff with individual department program services. Cross training of staff will occur annually and on a regional basis. For new staff, orientation will include an introduction to all core partner programs and services. This cross training will help to facilitate a transition of customers from program to program for better education and training outcomes for individuals. This should also include training to identify, address, and resolve implicit bias and stereotypes to help expand access to all Vermonters.

Additionally, the core partners are committed to developing a universal referral process for common customers to be used for expanded and coordinated case management. There are areas of overlap in service that will be better coordinated with a common referral process. This common referral will follow the customer from program to program, identifying the services provided by each partner. As each partner becomes more familiar with each other's services, individuals will be able to access each program's services regardless of where they enter the workforce development system. Finally, in order to facilitate coordinated service to individuals, each partner is committed to more effective communication among the partner programs. The partners are committed to a concentrated effort to share information and resources amongst each other.

The partners plan to explore joint case management strategies similar to what is used with postsecondary education plans developed under the economic services department. The programs work in collaboration to ensure the participant's educational plan will provide the participant with the best opportunity to succeed. Additionally, each program must sign off of the plan in order for the participant to get final approval and funding. This type of collaboration must be expanded to other areas of the workforce development system in order to ensure the success of Vermont participants and avoid the duplication of services.

III. Operational Planning Elements

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

A. State Strategy Implementation

The Unified or Combined State Plan must include—

1. State Board Functions

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

The Vermont State Workforce Development Board (SWDB) advises the Governor on the development and implementation of a comprehensive, coordinated, and responsive workforce education and training system. Vermont is designated as a Single State Local Area, and the SWDB is designated as the State and Local Workforce Development Board under the federal Workforce Innovation and Opportunity Act. Under Section 101(d) of the WIOA, the SWDB assists the Governor in the following functions:

- The development, implementation, and modification of the State plan.
- Review of statewide policies, statewide programs, and of recommendations on actions that should be taken to align workforce development programs in a manner that supports a comprehensive and streamlined workforce development system, including the review and provision of comments on the State plan, if any, for programs and activities of one-stop partners that are not WIOA core programs;
- The development and continuous improvement of the workforce development system, including:
 - o Identification of barriers and means for removing barriers to better coordinate, align, and avoid duplication among the programs and activities carried out through the system.
 - o Development of strategies to support the use of career pathways for the purpose of providing individuals, including low-skilled adults, youth, and individuals with barriers to employment (including individuals with disabilities), with workforce investment activities, education, and supportive services to enter or retain employment.
 - o Development of strategies for providing effective outreach to and improve access for individuals and employers who could benefit from services provided through the workforce development system.
 - o Development and expansion of strategies for meeting the needs of employers, workers, and job seekers, particularly through industry or sector partnerships related to in-demand industry sectors and occupations.

- o Development and continuous improvement of the One-Stop Center delivery system, including providing assistance to the One-Stop Operator, One-Stop Partners, and providers with planning and delivery services, including training services and supportive services, to support effective delivery of service to workers, job seekers, and employers.
- o Development of strategies to support staff training and awareness across programs supported under the workforce development system.
 - Development and updating of comprehensive state performance accountability measures, including state adjusted levels of performance, to assess the effectiveness of the core programs in the state.
 - Identification and dissemination of information on best practices, including best practice for:
 - o 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.
 - o Effective training programs that respond to real-time labor market analysis and effectively use of direct assessment and prior learning assessment to measure an individual's prior knowledge, skills, competencies, and experiences and evaluate such skills, and competencies for adaptability, to support efficient placement into employment or career pathways.
 - Development and review of statewide policies affecting the coordinated provision of services through the state's One-Stop delivery system, including the development of:
 - o Objective criteria and procedures for use in assessing the effectiveness and continuous improvement of One-Stop Centers.
 - o Guidance for the allocation of One-Stop Center infrastructure funds.
- o 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.
 - Development of strategies for technological improvements to facilities access to, and improve the quality of, services and activities provided through the One-Stop delivery system, including such improvement to:
 - o Enhance digital literacy skills.
 - o Accelerate the acquisition of skills and recognized post-secondary credentials by participants.
 - o Strengthen the professional development of providers and workforce professionals.
 - o Ensure such technology is accessible to individuals with disabilities and individuals residing in remote areas.
 - Development of strategies for aligning technology and data systems across One-Stop partner programs to enhance service delivery and improve efficiencies in reporting on performance accountability measures, including the design and implementation of common intake, data collection, case management information, 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.
 - Preparation of required annual reports.
 - Development of the statewide workforce and labor market information system.
 - Development of other policies that may promote statewide objectives for, and enhance the performance of, the workforce development system in the state.

In addition to the functions required under section 101(d) of the WIOA, the SWDB is tasked with the following duties:

- Conduct an ongoing public engagement process throughout the State that brings together employers and potential employees, including students, the unemployed, and incumbent employees seeking further training, to provide feedback and information concerning their workforce education and training needs; and
- Maintain familiarity with the federal Comprehensive Economic Development Strategy (CEDS) and other economic development planning processes, and coordinate workforce and education activities in the State, including the development and implementation of the State plan required under the Workforce Investment Act of 1998, with economic development planning processes occurring in the State, as appropriate.

The SWDB operates as a public board in Vermont enacted through 10 V.S.A. chapter 22A (Workforce Education and Training). The board meets at a minimum three times annually, with additional work groups called when necessary. A majority of members is required to constitute a quorum and action taken requires a majority of the members present. The SWDB maintains official minutes and abides by sunshine and conflict of interest provisions.

The SWDB Chair and the Commissioner of the VDOL are authorized to establish work groups to facilitate the work of the Board. These smaller, targeted work groups are instrumental to implementing the functions of the SWDB, because they allow for flexible decision-making and more intimate monitoring of progress. The work groups meet as frequently as needed to consider and recommend policies to the SWDB to implement the SWDB's functions. Additionally, they allow the full SWDB to focus on developing statewide policies, such as career pathways, at their meetings

Currently, there are two standing committees of the SWDB: the Operating Committee and the Standing Youth Committee. The Operating Committee is a business-majority committee that also includes members from government, including the core partner agencies. The Operating Committee is tasked with the day-to-day operations of the SWDB, and is required to report in writing to the SWDB on all Committee decisions. The activities that the Operating Committee may engage in, on behalf of the Board, include:

- Participating in meetings and activities that promote the work of the Board, such as marketing and advocating for the goals of the Board, WIOA and Vermont's workforce system;
- Reviewing and responding to state and federal legislative proposals that impact Vermont's workforce system, as necessary;
- Overseeing the performance of the WIOA core partners relative to their state and federal performance measures, and when necessary, providing necessary approval for the submission of documents or reports;
- Approve the draw-down of federal funding, if necessary; and
- Addressing urgent and/or time-sensitive business when a regular or special meeting cannot occur in time to meet the deadline.

Specific policies regarding the functions of the SWDB that are under currently consideration by the Operating Committee include the selection, certification, and evaluation of the one-stop operator, as well as developing strategies for aligning technology and data systems across one-stop partner programs.

The Youth Committee is tasked with providing information to the SWDB and assisting with the planning, operational and other issues related to services for youth. Particular policies regarding the functions of the SWDB that are currently under consideration by the Youth Committee include the selection of youth service providers, and the effective provision of services to out-of-school youth.

2. Implementation of State Strategy

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

A. Core Program Activities to Implement the State's Strategy

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

In order for Vermont's workforce development system to succeed, and to ensure the accomplishment of the State's goals, the core partner must increase their communication and coordination in providing services to Vermonters. Specifically, the core partners must share resources, expertise, and information to better integrate and avoid the duplication of services. The core partners both understand this obligation and are committed to taking the steps necessary to improve the workforce development system in Vermont and expand access and services to Vermonters. A. CORE PROGRAM ACTIVITIES TO IMPLEMENT STATE STRATEGY The VDOL, AOE, and DVR will work in partnership to carry out the goals of this State Plan. Most important to a successful implementation is the continued communication among the core partners at all levels of administration. In order to keep the communication lines open and to facilitate the implementation of this plan the partners will meet on a quarterly basis. Concurrently, the regional managers of each core program will schedule to meet on a regular basis to develop professional relationships, discuss best practices, and review compliance with the State Plan. The core partners will be responsible to ensure the regional offices are implementing the policies and procedures developed by the SWDB. Additionally, the partners are committed to the following: • Development of workforce training and education programs clearinghouse. • Inter-agency training. • Universal intake and referral. • Co-enrollment of customers. • Collaborative outreach and business services. These activities are described in detail below.

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.

Once established, the core partners intend to expand the coordination and alignment of State strategies to include other workforce development partners, ensuring that all services are available to Vermonters, especially those with barriers to employment. This will take the form of MOUs between the core partners and other State programs, including required one-stop partners. Additionally, the core partners hope to expand the use of a unified referral process with other partner programs to better facilitate co-case management. Furthermore, the core partners intend to utilize the Supplemental Nutrition Assistance Program, Education and Training grant to test new strategies to support return to work for the chronically underserved populations. This grant is a partnership between DCF, VDOL, DVR, and the Community College of Vermont to provide comprehensive return to work services for beneficiaries who are recent offenders, have substance abuse disorders, or are homeless. The VDOL will partner with the Learning Works partner programs to increase success for registered apprenticeship program candidates in the State. This will include jointly establishing a minimum basic skills requirement for success in the apprenticeship and pre-apprenticeship programs, and aligning this to approved standardized basic skills assessment instruments in use. Candidates can be advised of the importance of surpassing this skill level, and introduced to adult education and literacy programs for basic skills assessment and the accompanying instructional support to improve skills. For example, it is noted that basic mathematics concepts represent barriers to completion for some participants enrolled in pre-apprenticeship and apprenticeship programs. VDOL and Learning Works partners can work together to establish that all program participants have a certain minimum TABE math score for success in the program. When a candidate tests below the level, he or she can take advantage of relevant instructional support to build basic math skills through the adult education and literacy programs while they are engaged in the pre-apprenticeship or apprenticeship program; thus addressing a barrier to completion.

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 Core Partners are each committed to providing comprehensive, high-quality, customer-centered services to Vermonters. This will require each partner to become familiar with each other's programs and services to ensure that a customer has all tools available to him or her, regardless of where he or she enters the workforce development system. In order to facilitate this, the partners are committed to the following activities to align services to individuals: cross training, common referral, and better communication. The WIOA requires, and Vermont is committed to, a comprehensive one-stop delivery system. However, not all Vermonters engage the workforce development system through the American Job Centers. In order to ensure Vermonters have access to all available services, each partner is committed to a cross training program to familiarize staff with individual department program services. Cross training of staff will occur annually and on a regional basis. For new staff, orientation will include an introduction to all core partner programs and services. This cross training will help to facilitate a transition of customers from program to program for better education and training outcomes for individuals. This should also include training to identify, address, and resolve implicit bias and stereotypes to help expand access to all Vermonters. Additionally, the core partners are committed to developing a universal referral process for common customers to be used for expanded and coordinated case

management. There are areas of overlap in service that will be better coordinated with a common referral process. This common referral will follow the customer from program to program, identifying the services provided by each partner. As each partner becomes more familiar with each other's services, individuals will be able to access each program's services regardless of where they enter the workforce development system. Finally, in order to facilitate coordinated service to individuals, each partner is committed to more effective communication among the partner programs. The partners are committed to a concentrated effort to share information and resources amongst each other. The partners plan to explore joint case management strategies similar to what is used with postsecondary education plans developed under the economic services department. In developing a plan, the customer must visit and discuss the plan with multiple state programs, i.e., Vermont Student Assistance Corporation, the VDOL, the DVR, and state educational institutions. The programs work in collaboration to ensure the participant's educational plan will provide the participant with the best opportunity to succeed. Additionally, each program must sign off of the plan in order for the participant to get final approval and funding. This type of collaboration must be expanded to other areas of the workforce development system in order to ensure the success of Vermont participants and avoid the duplication of services.

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 engagement is just as important to the success of the Vermont workforce development system as are individual services. Both the VDOL and the DVR engage Vermont employers to meet their workforce needs. These activities must be better aligned and coordinated to ensure Vermont employers are getting the most out of Vermont's workforce development system. The VDOL and DVR are committed to coordinated employer outreach and marketing to ensure the needs of employers are being met. Arguably the most important aspect of employer services is knowing the employer needs within the State. The mismatch in workforce skills was acknowledged as a major issue in the Economic Development Strategy produced by the Vermont Agency of Commerce and Community Development in 2014.

The VDOL and ACCD, in consultation with other workforce development partners, are currently developing a workforce needs assessment to survey Vermont businesses to better understand the needs of employers in the State. This outreach should be conducted in consultation with the DVR in order to ensure the workforce needs of all employers are identified, including those employers who employ individuals with disabilities. Additionally, both the VDOL and DVR will conduct job fairs, hiring events, and provide job seeker referrals in coordination. The VDOL and DVR will develop protocols to ensure that employer outreach is jointly conducted. Included among these protocols are joint job fairs and business recognition events, as well as holding regular meetings between the partner employment representatives to share contacts and local outreach activities. The VDOL and DVR will further expand partnerships with local workforce development leaders.

Although Vermont is a Single State Area with one SWDB, there are numerous local partners with extensive knowledge of local employers. The core partners intend to engage these local leaders to help in identifying skill gaps and developing training pipelines to meet the needs of local businesses.

E. Partner Engagement with Educational Institutions

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

Although Vermont's high school graduation rate is one of the best in the country, increasing college and career readiness, and learning and skill development among Vermonters remains a State priority. The core partners must continue to engage our educational institutions to ensure that a skilled and ready workforce is available for the high-demand occupations and industries. Schools must develop courses of study and work-based learning opportunities that align with real career and job opportunities. The partners are committed to the use of accurate labor market information in order to promote a job-driven education and training system. Vermont's labor market information is developed by the VDOL Economic and Labor Market Division and has increase outreach to secondary and postsecondary institutions, including career and technical education programs and eligible training providers, to help them focus on current, accurate labor market information, as opposed to relying on anecdotal information when determining program offerings. This will help to ensure that skills being taught are those relevant to the needs of the business community and necessary for Vermonters to succeed in the workforce. This job-driven system should focus on high-demand, high-wage jobs. In order to identify and develop these career pathways, the core partners will collaborate on sector based training programs. This will require partnerships with educational providers throughout the state to ensure the education and training is available to those who seek it.

In 2015, the Vermont Legislature passed Act 51 which requires the VDOL, ACCD, AOE, and the Vermont State Colleges to collaborate more closely to develop high school career and technical education programs of study, including adult and technical education programs, aligned with the needs of Vermont employers. The core partners will work with local educational institutions, specifically secondary schools and adult education centers, to ensure that individuals who are leaving school are engaged in the workforce system as soon as possible. As opposed to waiting on individuals to enter the workforce system later, the core partners want to engage these individuals as soon as they leave school in order to ensure the continuity of career development.

F. Partner Engagement with Other Education and Training Providers.

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

Vermont has many key stakeholders involved in the workforce development system to create a comprehensive and effective system. The SWDB The Vermont Legislature in 2014 the Vermont Legislature passed Act 199 requiring the Commissioner of Labor to develop "an integrated system of workforce education and training in Vermont." Since that time, the VDOL has conducted comprehensive data collection on training and education programs throughout Vermont; engaged with other state agencies in collaborative reviews of state grant awards for training of new and incumbent workers; updated or written MOUs for data exchange and sharing; enhanced existing and supported new internship and apprenticeship programs; helped support and participate in a nationally-recognized program of registered apprenticeship that includes college credits attainment; upgraded the ETPL; led the work on the unified state plan; and successfully achieved \$6M in federal grants dedicated to workforce education, training,

reemployment and apprenticeship. In addition, VDOL has helped ACCD, VTC and CCV, UVM, AHS and AoE with their grant applications and other work projects relating to workforce education and training. In June, 2014, the Vermont Agency of Commerce and Community Development successfully authored a statewide comprehensive economic development strategy (CEDS) plan, thus propelling Vermont to be one of the few states in the nation to complete and have an approved CEDS. It was approved by Governor Shumlin and accepted by the EDA in July 2014. Participants in the CEDS outreach meetings repeatedly spoke of the challenge many Vermont entrepreneurs face in finding enough workers with the right skills to help businesses thrive. The state's current investments of more than \$1.6 billion in public education and additional tens of millions of dollars for workforce training are only partially succeeding in filling the skills gap. The Agency identified, among the workforce and education priorities, the need for a workforce needs assessment. The SWDB Chair and members (particularly the business members), with the Vermont Department of Labor, the Vermont agencies of Commerce and Community Development and Education, are collaborating on an extensive on-line and in-person survey of Vermont business to better understand the needs of employers with respect to specific skills that are currently lacking in the Vermont workforce. Vermont education and workforce development partners have been working to increase participation in education, stackable and industry-recognized credentials, and other measurable skill gains. According to the CEDS report, "While there is a growing sentiment that not all high school students benefit to the same extent from higher education, and that its associated costs and debt burdens exceed resulting benefits, the general trend of greater college participation is driven by the reality that a college degree—associate's, bachelor's, or graduate—opens doors for higher-wage opportunities which are closed to those without those credentials. As a particular sub-goal, Vermont should place an emphasis on expanding higher education opportunities for students from lower income backgrounds".

Another focus area for Vermont is to improve career technical education and adult technical education. It is clear that technical education can provide effective and low-cost career training, and can open a wide array of work opportunities. In Vermont, there is a great demand for skilled persons in building and construction trades, advanced manufacturing, information technology, and health care related fields, as well as other sectors. The business community is in need of workers at all levels, from entry to professional. The Vermont Agency of Education is leading the efforts, and funding the work, for personal learning plans, career pathways, and cooperative learning and direction from its professional educators, in the K-12 system. The Vermont Department of Labor, Agency of Commerce, Vermont State College system (including Community College of Vermont), the Adult Technical Education Centers and their directors and staff, local workforce boards, non-profits, and workforce education and training providers, including those on the List of Eligible Training Providers, are working together to construct new and enhance existing skill-specific trainings that will lead to credentials, degrees, and/or direct unsubsidized employment opportunities. Vermont state government, through both state and federal funding, currently spends more than \$60 million a year to deliver training to Vermonters, including, but not limited to, targeted populations such as veterans, dislocated workers, at-risk youth, trade adjusted workers, persons with disabilities, unemployed, under-employed, mature workers, persons with significant barriers to employment, low-income persons (including SNAP and ABAWD), corrections offender population, refugees and new Americans, and incumbent workers. Vermont core partners are committed to implementing a comprehensive workforce training system with:

- Assessment of individual participant's skills
- Coordination with the business community to align training to existing and future vacancies
- An information and referral network for workforce training opportunities
- Credentials that are recognized and trusted by the employer community
- Continued evaluation of all training to ensure relevancy and continued improvements
- Targeted recruitment to bring more workers into Vermont's labor market
- Assist entrepreneurial efforts that help start and grow business ventures, since Vermont is a state of small businesses (only 3% of the Vermont businesses have more than 50 employees).

G. Leveraging Resources to Increase Educational Access

Describe how the State's strategies will enable the State to leverage other Federal, State, and local investments that have enhanced access to workforce development programs at the above institutions, described in section (E).

Vermont is committed to increasing access to education to all Vermonters and using every available resource to do so. The core partners intend to leverage WIOA, TAA, Vocational Rehabilitation, Pell Grants, public and private grants, and other resources to assist participants in their educational goals. Additionally, the core partners coordinate with the Vermont Students Assistance Corporation, which provides grants, loans, scholarships, career and education planning, and general information for those seeking educational opportunities in Vermont. The core partners will take advantage of the Vermont High School Completion Program that provides a flexible pathway to a high school diploma or equivalent to all Vermonters aged 16 and older with the use of State funding.

H. Improving Access to Postsecondary Credentials

Describe how the State's strategies will improve access to activities leading to recognized postsecondary credentials, including Registered Apprenticeship certificates. This includes credentials that are industry-recognized certificates, licenses or certifications, and that are portable and stackable.

The Vermont General Assembly recently legislation requiring flexible pathways toward college and career readiness for all Vermont public students (Act 77, 2013). Several components of this legislation are directly relevant to improving access to post-secondary credentials for Vermonters. First, personalized learning plans for all middle and high school students are mandated to be in place. As of November 2015, all seventh and ninth grade students have a personalized learning plan in place. A core component of these learning plans, typically crafted with school advisee-advisor periods, will be discussion of relevant workforce opportunities for students along with educational pathways that are necessary to obtain such opportunities. The core partners will work together to ensure that relevant employment information, including the findings from the workforce assessment work, are made available to middle and high school educators so they may use this information to better inform students. Ensuring that graduating students have a clearer sense of exactly what type of post-high school educational credentials or high-quality certifications are necessary for specific jobs is critical to ensuring workforce success statewide.

Vermont also offers a robust, state-funded dual enrollment system to all high school students. Students are eligible to take two courses for college credit while they are still enrolled in high school, using these experiences to get a jump start, both experientially and financially, on their post-secondary endeavors. Some students leverage these dual enrollment opportunities with work-based learning in apprenticeships and industry shadowing opportunities to develop quite sophisticated personalized learning plans that have them on their way to college completion and workforce success upon high school graduation.

These models will be shared among the WIOA network in order to increase knowledge and logistics information regarding opportunities for students. Another component of Act 77 fosters increased use of Career and Technical Education (CTE) coursework for all students, in an effort to enhance the technical and practical skills of Vermont's high school students and ultimate workforce. Discussed previously, our CTE system is working closely with the VDOL, Vermont Agency of Commerce and Community Development, and Vermont Vocational Rehabilitation Services to better map CTE programmatic offerings with the Career Pathways

designated as “high priority” for Vermont. This work involves developing non-duplicative sequences of secondary and postsecondary courses within a CTE program of study to ensure that students transition to postsecondary education without duplicating classes or requiring remedial coursework. It also involves developing clear, easy to understand systems of stackable credentials for students to learn and strive for. The AOE will regularly share with WIOA partners its list of industry-recognized certificates available via secondary and postsecondary CTE programs statewide.

I. Coordinating with Economic Development Strategies.

Describe how the activities identified in (A) will be coordinated with economic development entities, strategies and activities in the State.

At the State level, the Agency of Commerce and Community Development is represented on both the State Workforce Development Board and the SWDB Operating Committee through the Secretary of Commerce and Community Development. This ensures that policies and decisions regarding the State’s workforce development system are taking into account the strategies and expertise of the Agency. The core partners will be working with the ACCD to develop the training and universal referral process described in (A). Additionally, the ACCD administers one-stop partner programs that are included in the one-stop delivery system. The policies and strategies developed by the core partners will be expanded to include these additional programs. Finally, in developing this State Plan, the core partners incorporated provisions of the Vermont 2020 Comprehensive Economic Development Strategy produced by the ACCD.

b. State Operating Systems and Policies

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

1. The State operating systems that will support the implementation of the State’s strategies. This must include a description of—

A. State operating systems that support coordinated implementation of State strategies (e.g., labor market information systems, data systems, communication systems, case-management systems, job banks, etc.).

Currently, the three core partners under the WIOA Unified Plan, the VDOL, the AOE, and the DVR, each use different operating and data systems for their respective programs. These systems do not have the capacity to exchange real-time data.

However, certain information is already collected and shared between the core partners through data sharing MOUs that address co-enrollment, data collection, and reporting.

Communication at the State level includes core partner program representation on the SWDB and its Operating Committee, and regular strategic meetings between the heads of the core partner programs. In order to advance the specific discussions around operating systems and policies, the core partner programs have identified key priorities, and instated monthly subgroup meetings to work on those priority issues. The meeting participants include staff and directors from the VDOL, the AOE, the DVR, and as appropriate, the TANF program administrator from the Vermont Department for Children and Families (DCF). The subgroup meetings focus notably on issues of cross training, colocation and common intake, data sharing, and common performance measures. The recommendations of these subgroups will be presented to the heads of the core partner programs to enable policy decisions at a statewide level. Once these policy decisions have been made, they will be operationalized through the training of local management teams and staff, including cross training that is uniform across partners, to further enhance communication on a local level. The vision for the cross training is to address core partner programs’ use of shared labor market information, communications, and case-management systems, among others.

Moreover, the VDOL’s Economic and Labor Market Information Division provides labor market information through a variety of avenues. VDOL staff are available to provide labor market information presentations, workshops, products, and other services to the SWDB, one-stop centers, core partners, one-stop partners, community partners, and employers. Labor market information is available online on Vermont Job Link (VJL) through the American Job Link Alliance, and on the website www.vtlni.info. This website is Vermont’s online resource for labor market information as supported by the Employment and Training Administration (ETA). All core partners have real-time access to this information, and receive technical assistance regarding the optimal use of the website. Core partners are also all members of Vermont’s Economic and Labor Market Information Division data listserv, which circulates news and other updates, in particular regarding new labor market information data products.

In order to bring their operating systems into alignment with the purposes of WIOA, and to support the implementation of the State’s strategies to improve service for individuals, the core partner programs will continue discussions to identify cost-effective approaches to connecting their data systems. The long-term goal is to facilitate interconnection and alignment between the data systems involved in case-management, job banks, performance reporting, and labor market information, among others, so that the information is shared in real time.

The VDOL received the Reemployment & System Integration (RSI) Dislocated Worker Grant (RSI-DWG) as an approach to realizing future interconnection and alignment. These grants are awarded to support high quality service delivery and improve employment outcomes for dislocated workers, through investment in technology solutions that support connectivity across programs and services provided to dislocated workers. The funds received from this grant would be used by Vermont to improve and expand integration and communication between its UI, Wagner-Peyser employment services, and WIOA workforce information technology systems, including systems for the DW program, to provide a seamless experience for dislocated workers and to assist dislocated workers in accessing services. While the purpose of this project is to improve assistance provided to dislocated workers, this project could also benefit other jobseekers. The services whose systems must be integrated must include, at a minimum, UI, ES, and WIOA title I DW programs. These programs are all currently administered by the VDOL. This unified administration will allow for more flexibility and efficiency in improving and expanding interconnection and communication. As part of the design and implementation of its own interconnected technology infrastructure, the VDOL is planning to include other core partner programs that also serve dislocated workers and other WIOA participants. By aligning its internal data system integration with the existing systems used by other core partner programs, the VDOL is looking ahead to achieve longer-term data system interconnection and alignment across core partner programs.

DEPARTMENT OF LABOR The VDOL's workforce development programs are predominantly administered by the Workforce Development Division. The VDOL operates the 12 Career Resource Centers located throughout the State. Additionally, VDOL manages Vermont's Labor Exchange System. Both labor exchange and workforce development programs are managed using VJL as a case management system. VJL is the VDOL's primary data collection and information exchange system.

VJL provides client tracking, case management support, and federal reporting services. The system operates through a Citrix interface that provides the user with the flexibility to conduct job searches and receive referrals to open positions. Program participants including UI, WIOA, Wagner-Peyser, ABAWD, and JFI are all required to register on VJL in order to receive services. VDOL employees can access the system through any VDOL office or while on the road through a secure portal. VJL collects and tracks data for the following programs: WIOA Title I youth, adult, and dislocated worker programs, including Vermont's Rapid Response activities; Trade Adjustment activities; Jobs for Veterans Program; Migrant Seasonal Farmworker activities; and employment assistance services such as Re-Employment Services and Eligibility Assessment. VJL provides system support to Vermont's National Emergency Grants. The VDOL's Apprenticeship program currently uses a portion of our legacy system (IDEM) in anticipation of moving to a new system called Rapid, along with VJL to track and register apprenticeships.

AGENCY OF EDUCATION

The AOE tracks the skill gains and secondary school graduation rates of participants through a web-based, relational database called DataWorks. DataWorks houses each AEL participant's engagement in postsecondary education and employment outcomes obtained through data matches with service provider partners.

Using Data Works, the AOE also tracks adult education and literacy provider training and activities. Providers are responsible for real-time data entry and are able to pull a range of reports to support program monitoring and improvement efforts. Data Works is aligned to the reporting parameters of the National Reporting System of the U.S. Department of Education and meets its assurances for data quality.

The AOE has an electronic communication system in place with the AEL field in the form of an e-mail distribution list. Similarly, distribution lists of principals, superintendents, and other key stakeholders are maintained by the AOE.

The Statewide Longitudinal Data System based out of the AOE is a possible future mechanism that could serve to support coordinated implementation of Vermont's workforce development strategies. It is a data system that will house student information from the early (elementary) years through secondary education and beyond. Currently, this system is in a development phase with piloting implementation occurring in 2016.

VOCATIONAL REHABILITATION DVR and DBVI track all consumer services through the 911 case tracking system. This system collects demographic, service, expenditure, and case-flow data. The system is used for all required federal reporting for both the DVR and DBVI programs. The system is managed by the DVR Program Evaluation Unit. This Unit matches 911 data to other administrative data sources such as the State Unemployment Insurance Wage Reporting System and the TANF system to coordinate and evaluate services across programs. DVR and DBVI are in the process of developing data sharing agreements with our core partners to allow matching of data for reporting outcomes under the WIOA common performance measures. The agreement hopes to allow the core partners to track co-enrollment across programs and coordination of services.

B. Data-collection and reporting processes used for all programs and activities, including those present in one-stop centers*.

Currently, the three core partners under the WIOA Unified Plan operate using different operating and data systems for their respective programs. These systems do not exchange real-time data and it is neither practical nor economically feasible, at this time, for the programs to integrate to a unified system. However, open lines of communication exist between the partner programs at the State level through representation on the SWDB and its Operating Committee, as well as at the local level. The core partners are committed to developing local management teams and/or local partner meetings to further develop the communication on a local level. This includes the development of cross training of core partner staff. Additionally, information is shared between the core partners through data sharing MOUs between and among workforce development partners to address co-enrollment and data collection and reporting. The VDOL's Economic & Labor Market Information Division provides labor market information to all partners. Staff is available to provide labor market information, including presentations, workshops, products, and other services, to the SWDB, one-stop center, core partners, and community partners and employers. Department of Labor The VDOL's workforce development programs are predominantly administered by the Workforce Development Division. The VDOL operates the 12 Career Resource Centers located throughout the State. Additionally, VDOL manages Vermont's Labor Exchange System. Both labor exchange and case management are managed using the Vermont Job Link (VJL) through the American Job Link Alliance. VJL is VDOL's primary data collection and information exchange system. VJL provides client tracking, case management support, as well as providing federal reporting services. The system operates through a Citrix interface that provides the user with the flexibility to conduct job searches and receive referral to open positions. VDOL employees can access the system through any VDOL office as well as on the road through a secure portal. VJL collects and tracks data for the following programs: WIOA Title I youth, adult, and dislocated worker programs, including Vermont's Rapid Response activities; Trade Adjustment activities; Jobs for Veterans program; Migrant Seasonal Farmworker activities; and employment assistance services such as Re-Employment Services and Eligibility Assessment. Finally, VJL provides system support to Vermont's National Emergency Grants. VDOL's Apprenticeship program utilizes a portion of our legacy system (IDEM) along with VJL to track and register apprenticeships. Agency of Education The AOE tracks the skill gains and secondary school graduation rates of participants through a web-based, relational database called DataWorks. DataWorks houses each AEL participant's engagement in postsecondary education and employment outcomes obtained through data matches with service provider partners. Using Data Works, the AOE also tracks adult education and literacy provider training and activities. Providers are responsible for real-time data entry and are able to pull a range of reports to support program monitoring and improvement efforts. DataWorks is aligned to the reporting parameters of the National Reporting System of the U.S. Department of Education and meets its assurances for data quality. The AOE has an electronic communication system in place with the AEL field in the form of an e-mail distribution list. Similarly, distribution lists of principals, superintendents, and other key stakeholders are maintained by the AOE. The Statewide Longitudinal Data System based out of the AOE is a possible future mechanism that could serve to support coordinated implementation of Vermont's workforce development strategies. It is a data system that will house student information from the early (elementary) years through secondary education and beyond. Currently, this system is in a development phase with piloting implementation to occur in 2016.

Vocational Rehabilitation DVR and DBVI track all consumer services through the 911 case tracking system. This system collects demographic, service, expenditure, and case-flow data. The system is used for all required federal reporting for both the DVR and DBVI programs. The system is managed by the DVR Program Evaluation Unit. This Unit matches 911 data to other administrative

data sources such as the State Unemployment Insurance Wage Reporting System and the TANF system to coordinate and evaluate services across programs. DVR and DBVI are in the process of developing data sharing agreements with our core partners to allow matching of data for reporting outcomes under the WIOA common performance measures. The agreement hopes to allow the core partners to track co-enrollment across programs and coordination of services.

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

2. The State policies that will support the implementation of the State's strategies (e.g., co-enrollment policies and universal intake processes where appropriate). In addition, provide the State's guidelines for State-administered one-stop partner programs' contributions to a one-stop delivery system.

An MOU outlining the agreement between Vermont's One-Stop Partners and the SWDB regarding coordination and accessibility of services and infrastructure cost-sharing agreements is included in Attachment II.

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.

State Agency Overview Department of Labor The VDOL is an independent department within the State government. The VDOL is led by a commissioner that reports directly to the governor. The VDOL has roughly 290 employees, with approximately 150 staff working from the central office located in Montpelier. Within the Department are the following divisions: Unemployment Insurance; Workforce Development; Worker's Compensation; VDOL Safety Division (VOSHA & Project Work-SAFE); Economic and Labor Market Information; and Wage and Hour and Employment Practices. The VDOL administers multiple one-stop partner programs, including: the WIOA Title I youth, adult, and dislocated worker programs; Employment Services authorized under the Wagner-Peyser Act; Trade Adjustment Assistance activities authorized under the Trade Act; Jobs for Veterans State Grants programs; and Vermont's Unemployment Compensation programs. VDOL maintains a central office located in Montpelier and oversees 12 regional offices offering job seekers and businesses recruitment and placement assistance. These American Job Centers (called Career Resource Centers) provide workforce development assistance to Vermonters. Agency of Education The Agency of Education is a standalone agency within the State government structure. The Agency is administered by a Secretary that reports to both the Governor and the State Board of Education. The AOE is authorized to manage the adult education and literacy system and receives federal and state funds for that purpose. Grants or contracts are awarded to eligible provider organizations, via an open Request for Proposal process, with funds distributed on the basis of county needs. The AOE Financial Services unit monitors all expenditures and billing, as well as other relevant financial operations for funding AEL services. Currently, the AOE staff work with and supervise funding for four direct service providers, with ten full-service centers and several satellite locations statewide. The State Board of Education and AOE provide leadership, support, and oversight to ensure that Vermont public education system enables all students, including adult learners, to be successful. The Agency's vision is that every learner in Vermont completes his or her public education with the knowledge and skills necessary for success in college, continuing education, careers, and citizenship. Vocational Rehabilitation DVR and DBVI operate within the Vermont State Government. DVR and DBVI are housed under the umbrella of the Agency of Human Services (AHS). AHS oversees the Department of Disabilities, Aging and Independent Living (DAIL). DVR and DBVI are divisional units within DAIL. The DAIL Business Office provides the financial operations for both Divisions and is responsible for all federal finance reporting. DAIL also provides overall operational support to the Divisions, including IT support and legal services. DVR has a central office and twelve offices statewide. The DVR Director supervises six regional managers, each managing two district offices. DVR has 70 VR counselors who operate through the 12 district offices. The DVR central office house program and operational managers and support staff for the Division. The Program Evaluation Unit is based in the DVR central office and is responsible for all DVR and DBVI reporting. DBVI has a central office and four district offices. The DBVI Director oversees four VR counselors and four rehabilitation associates located in the four district offices. This chart is only intended to reflect workforce development partners at the state level. There are numerous other Vermont workforce development partners at both the state and local level consisting of various other programs and services that help Vermonters through education and training. It is the intent of the Vermont core partners to engage and work with these other partners to ensure that Vermonters have access to all education and training services available throughout the state.

B. State Board

Provide a description of the State Board, including—

The SWDB is a business majority council, appointed by the Governor, with members representing all sectors of the economy and all geographic regions of the State. In addition, council membership includes top officials from State agencies and higher education institutions, representatives of labor and the low-income community, and members of the Vermont Legislature. The Chair is appointed by the Governor from the business membership.

i. Membership roster

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

1. Governor Phil Scott
2. Chair (Business) Frank Cioffi
3. Vice-Chair (Business) Jen Kimmich
4. Business Kiersten Bourgeois
5. Business Lynn Vera
6. Business Zach Hatch
7. Business Margueritte Dibble
8. Business John Russell

9. Business Steve Bryant
10. Business Geoff Glaspie
11. Business Ellen Kahler
12. Business Adam Grinold
13. Business Grant Spates
14. Business Brenan Riehl
15. Business Laurie Gunn
16. Business Greg Maguire
17. Business Don George
18. Business Cathy Lamberton
19. Business Kent Eldridge
20. Business Chris Loso
21. Business Carol Paquette
22. Business Scott Johnstone
23. Business Richard Marron
24. Business Janette Bombardier
25. Business Brian Kerns
26. Business Nate Beach
27. Business Paul Biebel
28. Business Jostein Solheim
29. Business Judy Geiger
30. State Representative Kathy Keenan
31. State Representative Tristan Toleno
32. State Senator Alison Clarkson
33. State Senator Dick Sears
34. Government: CEO (Mayor) David Allaire
35. Government: CEO (Mayor) Paul Monnette
36. Workforce: Labor Dennis Labounty
37. Workforce: Labor Jeff Wimette
38. Workforce: President of UVM Tom Sullivan
39. Workforce: Chancellor of VSC Jeb Spaulding
40. Workforce: VSAC Scott Giles
41. Workforce: Independent College [VACANT]
42. Workforce: Regional Tech Center Eileen Illuzzi
43. Workforce: High School Principal [VACANT]
44. Workforce: Youth Lisa Menard
45. Workforce: Youth Tom Longstreth
46. Workforce: Training Joyce Judy
47. Workforce: Training Gerry Ghazi
48. Workforce: Com. Economic Dev. Joan Goldstein
49. Workforce: Sec. ACCD Michael Schirling
50. Workforce: Sec. AHS Al Gobeille
51. Workforce: Underemployed Dave Wheel
52. Workforce: Underemployed Pat Elmer
53. Government: Core Program Lindsay Kurrle
54. Government: Core Program Rebecca Holcombe
55. Government: Core Program Diane Dalmasse

ii. Board Activities

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

The SWDB meets a minimum of three times per year. The SWDB Chair and the Commissioner of the VDOL are authorized to establish work groups to facilitate the work of the Board. These smaller, targeted work groups are instrumental to implementing the functions of the SWDB, because they allow for flexible decision-making and more intimate monitoring of progress. The work groups meet as frequently as needed to consider and recommend policies to the SWDB to implement the SWDB's functions. Additionally, they allow the full SWDB to focus on developing statewide policies, such as career pathways, at their meetings.

There are also five standing committees of the SWDB: the Operating Committee, Youth Committee, Policy Committee, Career Pathways Committee, and Training and Credentialing Committee. The Operating Committee was established to oversee the day-to-day operations of the SWDB. The Operating Committee is required to report in writing to the SWDB on all Committee decisions. The activities that the Operating Committee may engage in, on behalf of the Board, include:

- Participating in meetings and activities that promote the work of the Board, such as marketing and advocating for the goals of the Board, WIOA and Vermont's workforce system;
- Reviewing and responding to state and federal legislative proposals that impact Vermont's workforce system, as necessary;
- Overseeing the performance of the WIOA Core Partners relative to their state and federal performance measures, and when necessary, providing necessary approval for the submission of documents or reports;
- Approve the draw-down of federal funding, if necessary; and
- Addressing urgent and/or time-sensitive business when a regular or special meeting cannot occur in time to meet the deadline.

The Youth Committee is tasked with providing information to the SWDB and assisting with the planning, operational and other issues related to services for youth. Particular policies regarding the functions of the SWDB that are currently under consideration by the Youth Committee include the selection of youth service providers, and the effective provision of services to out-of-school youth.

Ad-hoc committees are established, as needed, and have included: state plan modification committee, credentialing committee, and adult education grant review committee.

The VDOL provides administrative and fiscal support to the SWDB, through its WIOA and State General Fund appropriations. This includes workforce and labor market information from the Economic & Labor Market Information Division of the VDOL. The USDOL, region 1 provides federal oversight and technical assistance to the VDOL, which in turn assists the State Board members and their VDOL staff in carrying out State Board functions effectively.

4. Assessment and Evaluation of Programs and One-Stop Program Partners

A. Assessment of Core Programs

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

Core partners will be assessed by the SWDB and its Operating Committee based on their performance accountability measures described in section 116(b) of WIOA. Vermont has not set any additional indicators of performance referenced in section 116(b)(2) (B) as part of this Unified State Plan. Assessment of the core programs in Vermont will include a review of whether each core partner program is exceeding, meeting, or failing in their performance accountability measures. The SWDB will look at whether the State is meeting the common performance accountability measures across all programs for each indicator and across all indicators for each program. The required frequency of the reviews will be determined by the SWDB, taking into account any potential duplication with other performance reporting obligations for programs, given that Vermont is a single-area state and the SWDB also functions as the Local WDB. The SWDB may develop and maintain a reporting dashboard tool to optimize the collection and analysis of performance data. In instances where a core partner is failing to meet their performance accountability measures, the SWDB Operating Committee will work to provide technical assistance to improve the proficiency of the program as well as adjusting the program strategies as necessary. Additionally, the SWDB Operating Committee will develop customer satisfaction surveys to assess the effectiveness of the one-stop delivery system, including the programs offered through the system, to better understand the system's strengths and weaknesses and identify areas of improvement.

B. Assessment of One-Stop Program Partner Programs

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

The SWDB and its Operating Committee will work to develop plans and tools on how to assess other workforce development programs that are offered through the Vermont one-stop delivery system. This may include a requirement that the one-stop partner programs submit their performance accountability reports to the SWDB, as well as looking at customer satisfaction survey results to examine applicable partner program services. The required frequency and the content of the reports will be determined by the SWDB, taking into account any potential duplication with other performance reporting obligations for programs, given that Vermont is a single-area state and the SWDB also functions as the Local WDB. The SWDB may develop and maintain a reporting dashboard tool to optimize the collection and analysis of the performance data.

C. Previous Assessment Results

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

D. Evaluation

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

The State Workforce Development Board (SWDB) will engage with the WIOA funded programs and any program's sub-contractor(s) to discuss and/or review (or help establish, as appropriate) evaluation metrics and methods, including, but not limited to: regular quality assurance checks and reviews; customer satisfaction surveys; review of all program compliance audits and reviews by the federal granting/oversight agencies; review of any audits or reports issued by a Vermont state government or legislative entity relating to the division, department or agency in relationship to WIOA funded programs and/or workforce training and education; effective data collection, including, but not limited to, specifically disaggregated data for gender that enables an analysis of the data with a lens of gender equity; and ensure that the WIOA funded program staff members are well trained and evaluated for helping to achieve performance and program goals. The SWDB Chair and SWDB Operating Committee determine projects for the Board, including, but not limited to, research projects, youth engagement, mature workers initiatives, veterans hiring, and other projects that further the goals of a well-trained and engaged workforce. These projects will substantially involve the SWDB, the Vermont employer community, local workforce investment boards and regional development corporations, the unified and core partners, other state agencies and departments, the education community, and training providers.

5. Distribution of Funds for Core Programs

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

A. For Title I programs

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

i. Youth activities in accordance with WIOA section 128(b)(2) or (b)(3),

As a single-area State, the Vermont SWDB carries out many of the local board functions, and as a result, has the authority to select providers of youth workforce investment activities. Youth service providers have not previously been selected on a competitive basis in Vermont, because the VDOL has operated the Youth program under a waiver of the competitive selection requirement since 2001. The purpose of this waiver has always been to accommodate the unique and challenging characteristics of a rural state, notably a lack of formal statewide service infrastructures commonly present in more heavily populated states.

Under WIOA § 123(a) and 20 CFR § 681.400(b), the general rule is that youth service providers must be selected on a competitive basis. However, the final rule provides new flexibility. In addition to a sole source option, there is also expanded scope for the grant recipient/fiscal agent to provide directly some or all of the youth workforce investment activities under 20 CFR § 681.400(a). As the Youth program grant recipient/fiscal agent in Vermont, the VDOL could be designated as the youth service provider, and the competitive selection requirement would not apply to those youth services provided by the VDOL. These three options (competitive procurement, sole source procurement, and direct provision of services by the grant recipient/fiscal agent) are currently under consideration by the Vermont SWDB.

The Standing Youth Committee made the recommendation to the Operating committee, that VDOL be designated as the youth service provider for youth workforce investment activities including; performance measures. The SWDB accepted and approved the recommendation for VDOL to be the designated youth service provider for youth workforce investment activities.

In any grant award, VDOL's process is transparent and involves representation from appropriate parties. For example, in our WIOA Summer Youth Employment Opportunity grants, VDOL has (1) a formal application process; (2) public notice through the State's bidding website; email notification to prior recipients; email notification to stakeholders and partners in the Youth services arena; (3) newspaper ads, as deemed appropriate; (4) review of the grant application by the WIOA Youth Committee members, and representatives of partner agencies; (5) consistent scoring sheets; (6) review of applicant's labor law compliance before finalizing any award.

ii. Adult and training activities in accordance with WIOA section 133(b)(2) or (b)(3),

Vermont as a single state workforce area has followed the federal requirements for distribution of funds. In TEGL 14-15 (March 04, 2016) USDOL advised that it was "exercising its transition authority provided in WIOA sec.503 to delay the requirement that Single-Area States include a local plan with their initial four-year State Plan submission until DOL provides guidance to those specific States."

Therefore, the Vermont Department of Labor, which operates as a Single-Area State and as the State Workforce Administrator for WIOA title I funds, has been authorized by the Governor and the SWDB as the WIOA Title I fiscal agent responsible for the following duties:

- Receiving, transferring and drawing down of federal WIOA title I funds;
- Ensuring sustained fiscal integrity and accountability for expenditures of the funds;
- Responding to federal and state audit financial findings;
- Maintaining proper accounting records and adequate documentation; and
- Preparing required federal and state financial reports. In any grant award, VDOL's process is transparent and involves representation from appropriate parties.

In WIOA Adult and Dislocated Worker Program, VDOL works with the individual worker to identify skill or education gaps and support that person in training, education, credentialing, OJT, apprenticeship, and other measurable skill gains leading to unsubsidized employment. Those programs have traditionally engaged Vermont's educational institutions, technical education systems, eligible training providers, private training providers, and our Vermont employer community to make available to the individual the training and work experiences s/he needs. In some cases, grant awards have been made, and grant partnerships have been forged, to achieve these goals. For example, VDOL has funded career readiness programs with our community college system; construction training for at-risk youth with Youth Build and for women with Vermont Works for Women; and many other trainings and programs to provide key skills needed to be successful in the Vermont workforce.

In considering whether to fund a grant to an entity, or an individual's training request, VDOL considers the following: (1) the degree to which the provider has been successful in responding to individual customer needs and to the needs of the Vermont employers in that region (or statewide, if appropriate); (2) the ability and willingness of the provider to serve all VDOL's customers, clients and all populations, including those with significant barriers to employment; (3) the past effectiveness of the provider in complying with

prior grant awards' criteria and in helping the person(s) achieve the skill, credential or unsubsidized employment, as applicable; (4) the extent to which the provider utilizes effective technology and training methods to increase the quality of the learning and the enhancement of the client's familiarity and proficiency with technology; (5) whether the grant proposal will duplicate services already existing in that region; and (6) the degree to which the grant proposal assists in furthering the goals set forth by the Governor, the SWDB's workforce development goals, and the needs of Vermont employers, VDOL customers and the workforce system.

iii. Dislocated worker employment and training activities in accordance with WIOA section 133(b)(2) and based on data and weights assigned.

Vermont as a single state workforce area has followed the federal requirements for distribution of funds. In TEGL 14-15 (March 04, 2016) USDOL advised that it was "exercising its transition authority provided in WIOA sec.503 to delay the requirement that Single-Area States include a local plan with their initial four-year State Plan submission until DOL provides guidance to those specific States."

Therefore, the Vermont Department of Labor, which operates as a Single-Area State and as the State Workforce Administrator for WIOA title I funds, has been authorized by the Governor and the SWDB as the WIOA Title I fiscal agent responsible for the following duties:

- Receiving, transferring and drawing down of federal WIOA title I funds;
- Ensuring sustained fiscal integrity and accountability for expenditures of the funds;
- Responding to federal and state audit financial findings;
- Maintaining proper accounting records and adequate documentation; and
- Preparing required federal and state financial reports. In any grant award, VDOL's process is transparent and involves representation from appropriate parties.

In WIOA Adult and Dislocated Worker Program, VDOL works with the individual worker to identify skill or education gaps and support that person in training, education, credentialing, OJT, apprenticeship, and other measurable skill gains leading to unsubsidized employment. Those programs have traditionally engaged Vermont's educational institutions, technical education systems, eligible training providers, private training providers, and our Vermont employer community to make available to the individual the training and work experiences s/he needs. In some cases, grant awards have been made, and grant partnerships have been forged, to achieve these goals. For example, VDOL has funded career readiness programs with our community college system; construction training for at-risk youth with Youth Build and for women with Vermont Works for Women; and many other trainings and programs to provide key skills needed to be successful in the Vermont workforce.

In considering whether to fund a grant to an entity, or an individual's training request, VDOL considers the following: (1) the degree to which the provider has been successful in responding to individual customer needs and to the needs of the Vermont employers in that region (or statewide, if appropriate); (2) the ability and willingness of the provider to serve all VDOL's customers, clients and all populations, including those with significant barriers to employment; (3) the past effectiveness of the provider in complying with prior grant awards' criteria and in helping the person(s) achieve the skill, credential or unsubsidized employment, as applicable; (4) the extent to which the provider utilizes effective technology and training methods to increase the quality of the learning and the enhancement of the client's familiarity and proficiency with technology; (5) whether the grant proposal will duplicate services already existing in that region; and (6) the degree to which the grant proposal assists in furthering the goals set forth by the Governor, the SWDB's workforce development goals, and the needs of Vermont employers, VDOL customers and the workforce system.

B. For Title II:

i. Multi-year grants or contracts

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

The Vermont AOE will run competitions for its funds under WIOA Title II using the procedures established by the State of Vermont for awarding grants or contracts and the guidance available from WIOA regulations. The application to apply will be made available to all eligible providers on the Vermont AOE Website. The grant opportunity and availability of the application will be widely announced through AOE and other network list serves.

An eligible provider is an organization that has demonstrated effectiveness in providing adult education and literacy activities and is eligible to apply for funds under WIOA Title II. An eligible provider may include, but is not limited to: a local educational agency; a community-based organization or faith-based organization; a volunteer literacy organization; an institution of higher education; a public or private nonprofit agency; a library; a public housing authority; a nonprofit institution with the ability to provide adult education and literacy activities to eligible individuals; a consortium or coalition of the agencies, organizations, institutions, libraries, or authorities described above; and a partnership between an employer and an entity described above.

The AOE will determine an organization's status as an eligible provider by obtaining performance data from the organization on its record of improving skills of eligible individuals, particularly those who have low levels of literacy. Prior to accepting full proposals, the Vermont AOE will request a letter of intent from interested organizations. The AOE will take questions and provide technical assistance to eligible providers preparing proposals. All full proposals will be submitted directly to the AOE exclusively. Each eligible provider will submit a single proposal to the AOE to fund one or more of sections 225, 231, and 243 and to serve one or more counties. As required by WIOA Title I B, local adult education and literacy activity proposals will be reviewed by the State Workforce Development Board (SWDB) for alignment with the State plan using a procedure and rubric established by the SWDB and the Vermont AOE. Because Vermont operates as a Single State Local Area, local proposals will be reviewed by the SWDB for alignment.

The AOE will score responses from eligible providers using a rubric based on these considerations for awarding grants or contracts as described in WIOA as pertinent to the proposed scope of work:

1. The degree to which the provider would be responsive to regional needs of the workforce and serving individuals most in need of adult education and literacy activities.
2. The ability of the provider to serve individuals with disabilities, including learning disabilities.

3. Past effectiveness of the provider in improving literacy of individuals, especially those who have low levels of literacy, and past effectiveness in meeting established performance targets.
4. The extent of alignment between proposed services and the regional strategies and goals of the workforce development system, and alignment with the services of the other one-stop partners.
5. Whether the provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains, and uses instructional practices that include the essential components of reading instruction.
6. Whether the provider's activities, including reading, writing, speaking, math, and English language acquisition instruction are based upon best practices and the most rigorous research available and appropriate.
7. Whether the provider's activities effectively use technology, services, and delivery systems possibly to include distance education in a manner sufficient to increase the amount and quality of the learning and how such technology, services, and systems lead to improved performance.
8. Whether the provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship.
9. Whether the provider's activities are delivered by well training instructors and program staff who access high quality professional development opportunities, including via the Literacy Information and Communications System (LINCS).
10. Whether the provider's activities, for the development of career pathways, coordinate with other available education, training, and social service resources in the community and other One-Stop Center partners.
11. Whether the provider's activities offer flexible schedules and coordination with federal, state, and local support services that are necessary to enable individuals to attend and complete programs.
12. Whether the provider maintains student records in Data Works, which has the capacity to report measurable participant outcomes and to monitor program performance.
13. Whether the local areas served by the provider have a demonstrated need for additional English language acquisition and civics education programs.

AEFLA funds will be distributed in compliance with the Vermont State Board of Education's FUNDING FORMULA RULE. The formula links adult education and literacy funding to the need for services at the county level, is responsive to the needs of adults, and gives weight to populations most likely to demand services. The formula consists of three parts:

- 1) Base of \$30,000 to each county;
- 2) 70% of balance for allocation on basis of statewide need - the need of the county relative to all counties in the state (State Need);
- 3) 30% of balance allocated on basis of comparative density of need within each county (County Burden). Indicators of need for services, used in both the State Need and County Burden sections of the formula are:
 - 15% ... un- or under-employed persons without a high school diploma;
 - 50% ... persons 18 or older without a high school diploma;
 - 20% ... persons living at 125% of poverty
 - 15% ... persons in categories of offenders, mothers without high school diplomas, and for whom English is a second language.

Data for indicators are updated annually with the most current information available.

- 1) Population: census data or most recent population estimates published by the Vermont Department of Health.
- 2) Several data categories are based on census and therefore not updated annually:
 - persons 18 or older without a high school diploma;
 - persons living at 125% of poverty;
 - persons for whom English is a second language.
- 3) Data for three indicators is available on a more regular basis from other State agencies:
 - un- or under-employed persons without a high school diploma;
 - offenders;
 - mothers without high school diplomas.

Funds will be awarded to eligible providers of adult education and literacy services on a basis of three or more years beginning July 1, 2017 for the purpose of establishing and operating programs that provide adult education and literacy activities within the service area of one or more particular counties. Providers will apply for continuing funding under Title II annually and all providers will be subject to the same funding cycle. Providers will function as a required and valued partner in the regional One-Stop Center (also known in Vermont as Career Resource Centers) including as a partner in the development of regionally-relevant career pathways with specific entrance points for lower skilled adults.

ii. Ensure direct and equitable access

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

Direct and equitable access to all eligible providers to apply and compete for AEFLA funds is ensured through public announcements that drive eligible providers to the agency's ADA compliant Website. Each eligible provider will use the one application provided on the Vermont AOE's Website and all applications will adhere to the same timeline for submission without exception or extensions.

The application will clarify that no other application will be made available to eligible providers and all applications must be submitted to AOE in order to compete for funds under Title II of WIOA. All eligible providers will be subject to the same competition process, i.e., the same procedures and rubric as described above. Each eligible provider will submit a single proposal to the agency to fund one or more of sections 225, 231, and 243 and to serve one or more counties.

C. Title IV Vocational Rehabilitation

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

The State of Vermont distributes Title IV funding for Vocational Rehabilitation as follows: 78% to the Division of Vocational Rehabilitation and 12% to the Division for the Blind and Visually Impaired. The funding distribution was established in the 1970s. Since then, the State has not been provided compelling data to alter the allocation in any way. The Division for the Blind is currently not in an Order of Selection and has funds to serve all eligible individuals. The Division of Vocational Rehabilitation is in an Order of Selection, but has had resources to routinely open the order in the last five years. Given the ability of both programs to serve eligible applicants, at this time the State is not considering any reallocation of Title IV funds.

6. Program Data

A. Data Alignment and Integration

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

i. Describe the State's plans to make the management information systems for the core programs interoperable to maximize the efficient exchange of common data elements to support assessment and evaluation.

The 12 career resource centers are operated by the VDOL. All VDOL programs, which includes WIOA Title I adult, dislocated worker, and youth programs, Title III Wagner Peyser and other one-stop partner programs, operate using the Vermont Job Link (VJL) intake and case management system. This system is an integrated, technology-enabled system that provides individuals with access to labor market information and job training opportunities. The core partners are working together to develop data sharing MOUs to help facilitate and explore data collection and sharing opportunities for assessment and evaluation purposes. Vermont has also advocated for data alignment and integration resolution at the federal level.

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.

The 12 career resource centers are operated by the VDOL. All VDOL programs, which includes WIOA Title I adult, dislocated worker, and youth programs, Title III Wagner Peyser and other one-stop partner programs, operate using the Vermont Job Link (VJL) intake and case management system. This system is an integrated, technology-enabled system that provides individuals with access to labor market information and job training opportunities. The core partners are working together to develop a universal referral process and data sharing MOUs to help facilitate and explore data collection and sharing opportunities for participation tracking purposes. Vermont has also advocated for data alignment and integration resolution at the federal level.

The VDOL has received the Reemployment & System Integration (RSI) Dislocated Worker Grant (RSI-DWG) as an approach to realizing future interconnection and alignment. These grants are awarded to support high quality service delivery and improve employment outcomes for dislocated workers, through investment in technology solutions that support connectivity across programs and services provided to dislocated workers. The funds received from this grant would be used by Vermont to improve and expand integration and communication between its UI, Wagner-Peyser employment services, and WIOA workforce information technology systems, including systems for the DW program, to provide a seamless experience for dislocated workers and to assist dislocated workers in accessing services.

While the purpose of this project is to improve assistance provided to dislocated workers, this project could also benefit other jobseekers. The services whose systems must be integrated must include, at a minimum, UI, ES, and WIOA title I DW programs. These programs are all currently administered by the VDOL. This unified administration will allow for more flexibility and efficiency in improving and expanding interconnection and communication. As part of the design and implementation of this interconnected technology infrastructure, the VDOL is planning to include other core partner programs that also serve dislocated workers and other WIOA participants, notably the Agency of Education for WIOA title II, and the Division of Vocational Rehabilitation for WIOA title IV. By aligning its internal data system integration with the existing systems used by other core partner programs, the VDOL is looking ahead to achieve longer-term data system interconnection and alignment across core partner programs, including for improving participation through streamlined intake and improved service delivery.

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.

Currently, the three core partners under the WIOA Unified Plan, the VDOL, the AOE, and the DVR, and the various one-stop partners, each use different operating and data systems for their respective programs. These systems do not have the capacity to exchange real-time data.

However, certain information is already collected and shared between the core partners through data sharing MOUs that address co-enrollment, data collection, and reporting.

Communication at the State level includes core partner program representation on the SWDB and its Operating Committee, and regular strategic meetings between the heads of the core partner programs. In order to advance the specific discussions around operating systems and policies, the core partner programs, with the participation of the TANF program administrator from the Vermont Department for Children and Families (DCF), have identified key priorities, and instated bi-monthly subgroup meetings to work on those priority issues. The meeting participants include staff and directors from the VDOL, the AOE, the DVR, and as appropriate, the Vermont DCF TANF program. The subgroup meetings focus notably on issues of cross training, colocation and

common intake, data sharing, and common performance measures. The recommendations of these subgroups will be presented to the heads of the core partner programs and as appropriate, the Vermont DCF TANF program to enable policy decisions at a statewide level. Once these policy decisions have been made, they will be operationalized through the training of local management teams and staff, including cross training that is uniform across partners, to further enhance communication on a local level. The vision for the cross training is to address core partner and TANF programs' use of labor market information, communications, and case-management systems, among others.

Moreover, the VDOL's Economic and Labor Market Information Division provides labor market information through a variety of avenues. VDOL staff are available to provide labor market information presentations, workshops, products, and other services to the SWDB, one-stop centers, core partners, one-stop partners, community partners, and employers. Labor market information is available online on Vermont Job Link (VJL) through the American Job Link Alliance, and on www.vtlmi.info. www.vtlmi.info is Vermont's online resource for labor market information as supported by the ETA. All core partners have real-time access to this information, and receive training on the optimal use of the website. Core partners and the Vermont DCF TANF program partner are also all members of Vermont's Economic and Labor Market Information Division data listserv, which circulates news and other updates, in particular regarding new labor market information data products.

The SWDB will engage with the core and one-stop partners to develop strategies to improve the quality of services and activities provided through the One-Stop delivery system. The strategies will target certain key areas for improvement, including:

- alignment of technology used to deliver one-stop services;
- ensuring that such technology is accessible to individuals with disabilities and individuals residing in remote areas;
- enhancing participants' digital literacy skills;
- accelerating participants' acquisition of skills and recognized post-secondary or industry recognized credentials; and
- strengthening the professional development of providers and workforce professionals.

iv. Describe the State's plans to develop and produce the reports required under section 116, performance accountability system. (WIOA section 116(d)(2)).

The VDOL will be responsible for coordinating the core partners' annual performance report. Each core partner will be responsible for their own reports as required by WIOA and their federal funding source. Based upon the WIOA requirements to utilize wage record data for performance review and evaluation, the VDOL will lead a process to discuss the WIOA wage record matching needs of partner agencies, and to design MOUs with the partners to match core partner program participants' wage records in order to develop baseline data for the WIOA Plan. The SWDB will work with each of the core partners to enable them to continue to meet their performance accountability reporting requirements. The drafting of specific MOUs for ongoing wage matching are in progress.

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

B. Assessment of Participants' Post-Program Success

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

The Vermont core partners will work with the SWDB and its Operating Committee to use the workforce development system to assess participants' post-program success. This may include frequent reporting to the Operating Committee on the common performance data reported by the core programs in compliance with WIOA § 116 and 20 C.F.R. § 677.155, as that data pertain to participants' success after exit from the programs. The required frequency of the reports will be determined by the SWDB, taking into account any potential duplication with other performance reporting obligations for programs, given that Vermont is a single-area state and the SWDB also functions as the Local WDB. The specific performance measures that will be considered in assessing participants' success will depend on the individual program and its reporting requirements, which may include:

- the percentage of participants who are in education or training activities, or unsubsidized employment during the second and fourth quarters after program exit,
- the percentage of participants enrolled in an education or training program (excluding those in OJT and customized training) who attained a recognized postsecondary credential or a secondary school diploma, or its recognized equivalent, during participation in or within one year after program exit.

Additionally, the core partner programs will provide post-program follow-up services as appropriate and in accordance with the particular program's requirements. As part of the follow-up services, customer satisfaction will be monitored through the use of business and participant satisfaction surveys in order to help in analyzing participants' post-program success.

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.)

Vermont's Unemployment Insurance Division is located within the Vermont Department of Labor. The VDOL, UI Division provides employee wage data through MOUs with partner agencies. The proposed WIOA regulations specifically require quarterly wage record information for reporting on WIOA performance accountability measures. As mentioned, the partners are in discussion to develop WIOA specific MOUs that will cover the sharing of data in order to comply with state and federal performance reporting.

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 protection of privacy is of the utmost importance to the state of Vermont. In order to ensure to protection of participant privacy, the core partner programs agree to secure handling of data sharing information. Relevant MOUs between the core program partners shall require the security of all sensitive information and each partner shall ensure that the collection and use of information will be in compliance with all applicable federal and state laws. Each partner shall ensure that relevant information is only made available to authorized staff and information is only made available for the limited purpose necessary to perform a required responsibility.

7. Priority of Service for Veterans

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

Vermont is dedicated to serving all veterans throughout the state by connecting them to the education and training that they need to be successful in post-military life. The State is committed to providing opportunities to veterans regardless of where they enter the workforce development system.

Veterans under WIOA § 3(63)(A) and 38 U.S.C. § 101 receive priority of service in all U.S. Department of Labor-funded employment and training programs, as set out in 38 U.S.C. § 4215 and described in 20 C.F.R. part 1010. 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. 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, nor does it include full-time active duty performed by National Guard personnel who are mobilized by State rather than Federal authorities.

Priority of service is defined under federal law as the right of covered persons to take precedence over non-covered persons in obtaining services. Taking precedence means that the covered person receives access to the service or resource earlier in time than the non-covered person; or if the service or resource is limited, the covered person receives access to the service or resource instead of the non-covered person. Furthermore, to be entitled to receive priority of service under any qualified employment and training program, including WIOA programs, a veteran still must meet each program's eligibility criteria.

WIOA § 134(c)(3)(E) also establishes a distinct statutory requirement to provide priority of service to a particular group of persons. With respect to funds for adult employment and training activities (adult formula funds), WIOA § 134(c)(3)(E) directs one-stop operators to give priority to recipients of public assistance, other low income individuals, and individuals who are basic skills deficient for the receipt of career service and training services. The interaction between veterans and these other priority populations requires a specific order to be followed in the provision of services. As described in TEGL 3-15 and TEGL 10-09, the order of priority for services that must be provided is the following:

- First, to veterans and eligible spouses, including surviving spouses, who are also given statutory priority for WIOA adult formula funds. This means that veterans and eligible spouses who are also recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient receive first priority for services provided with WIOA adult formula funds. This priority must be provided regardless of the level of funds allocated.
- Second, to non-covered persons (individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.
- Third, to veterans and eligible spouses who are not given statutory priority for WIOA adult formula funds
- Last, to non-covered persons outside all of the groups given priority under WIOA.

As the administrator of the DOL-funded job training programs in Vermont, the VDOL is mandated to provide priority of service to veterans. As part of this mandate, the VDOL will continue to monitor the priority of service provided to veterans throughout the Vermont workforce system. Each American Job Center manager reviews the priority of service provided in the cases managed by their office. The VDOL central office also performs on-site visits to the American Job Centers, and reviews managers' quarterly reports. The VDOL central office moreover reviews the American Job Centers' internal policies and procedures to ensure that they comply with the priority of service requirements. The VDOL employs a veterans coordinator who is responsible for the day-to-day monitoring of veterans' priority of service.

The priority of service provided to Vermont's veterans includes preference in job placement activities and the job referral process. The automated Labor Exchange System, Vermont Job Link (VJL), identifies veterans at their point of entry into the system. Point of entry not only includes physical locations, such as the American Job Centers, but also websites and other virtual service delivery resources provided to or by the One-Stop Delivery System. Job placement activities and resume searches are coded for veteran's priority of service. Veterans and other covered persons have a two-day advance on new job orders, and see job postings on the same day they are processed. Additionally, only veterans and other covered persons have resumes presented to self-service employers on the same day they post a job. Within the VJL system, an American flag symbol is displayed beside a veteran account for employers to easily identify and match veterans to open positions. VJL also provides queries that enable staff to search for newly registered veterans to ensure follow up to make these veterans aware of the services and programs available to them, and their priority of service within those programs. A non-exhaustive list of services that Vermont provides to veterans includes:

- Veterans Preference
- Initial Assessment
- Career Guidance
- Personalized Job Search Assistance
- Job Referrals
- Labor Market Information
- Referrals to Training Programs
- Resume Preparation
- Interviewing Skills

- Employment Search Workshops
- Career Assessment Workshops
- Electronic Job Banks/Computer Access
- Financial Aid Information

Local Veterans Employment Representatives (LVER) conduct outreach to employers and engage in advocacy efforts with hiring executives to increase employment opportunities for veterans. These representatives also monitor all job listings from federal contractors and agencies to ensure veterans receive priority of service in referrals to these positions. LVER staff conduct seminars for employers and job search workshops for veterans seeking employment. LVER staff facilitate priority of service in regards to employment, training, and placement services furnished to veterans by all staff members.

The referral process for veterans starts at their first point of contact with the workforce development system. Individuals are prompted at their point of entry to self-identify their veteran status, in order to ensure that they are able to take full advantage of the available services. Whether the individual or their spouse has ever served in the U.S. military is asked either by staff at physical locations, or through the online VJL registration system, depending on how the individual enters the system. Once veterans or eligible spouses self-identify their status, they are asked to provide more detailed information on an intake and intensive services determination form. If the individual does not indicate that they have a significant barrier to employment, then they are referred for assessment with the first available case manager to determine their eligibility for programs. If they check any of the factors that indicate a significant barrier to employment, then AJC staff attempt to connect them immediately with a Disabled Veteran's Outreach Program (DVOP) specialist from the Jobs for Veterans State Grants program (JSVG). If a DVOP is unavailable to see the individual immediately, then AJC staff make a referral to ensure that the veteran or eligible person is seen by a DVOP specialist.

Upon referral, DVOP specialists provide intensive services and facilitate placements in order to meet the employment needs of Vermont's eligible veterans and eligible persons. This intensive case-management approach individually tailors training and job placement opportunities, with the maximum emphasis placed on assisting those who are economically or educationally disadvantaged. In accordance with 38 U.S.C. § 4103A, priority of service is given first to special disabled veterans, and then to other disabled veterans. The DVOP helps to identify job opportunities that are appropriate for the veteran's employment goals, and assists the veteran in developing a cover letter and a resume that target those particular jobs. Vermont has two full-time and one half-time DVOP specialists who serve Vermont's eligible veterans and eligible persons.

8. Addressing the Accessibility of the One-Stop Delivery System for Individuals with Disabilities

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

The Vermont workforce development partners have evaluated the one-stop delivery system to ensure that all employment education and training programs are available and accessible. Collectively, partners are providing resources to individuals in need of specific and specialized assistance in overcoming barriers to employment. In Vermont's comprehensive one-stop location, in Burlington, all services are provided through a combination of physical and virtual colocation.

Vermont's career resource centers are fully accessible for individuals with disabilities and have access to a variety of specialized equipment to help these individuals. The State's One-Stop certification process for the career resource centers includes a review using the American's with Disabilities Act checklist for Readily Achievable Barrier Removal. Furthermore, all of the partner programs require accessibility in both rented and state-owned properties.

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 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.

The Vermont Department of Labor as the SWDB—designated operator for the One—Stop System, will continue to support the needs of English Language Learners (ELL), through the following methods: 1. Continue to diversify our own workforce in the One Stops by hiring people of diverse ethnic, racial, cultural and socio—economic backgrounds. 2. Continue to provide no—cost (to the customer) translation services, in person and online, to our customers in all services. 3. Continue to require all VDOL staff to attend the mandated, annual staff training in non—discrimination/non—harassment and diversity, presented by the State's Human Rights Commission and the VDOL's EEO Officer. 4. Continue to develop an effective outreach strategy to Vermont's agricultural workers (migrant and seasonal, H2A, and others) in conjunction with our current partnership with UVM Extension program, Migrant Justice, Vermont Housing and Community Development, VDOL Wage and Hour, VDOL MSFW and SWA, VDOL Legal Division, and others, and update the outreach and education materials that assist developed in partnership with the aforementioned organizations. 5. Continue to support our staff members' participation, including during regular work hours and non—work hours, in community organizations and events that engage with and support the needs, goals and awareness of the new American and ELL communities. 6. Continue to be a funding—sponsor of cultural events in the community. 7. Offer new trainings (in person and online) in topics such as cultural competency, white privilege, gender bias, and other relevant topics. 8. Continue to develop a New American Workforce strategy built on, but not limited to: a. New American/ELL webpage on our website, with resources to assist with skill assessment, job search and placement; b. Enhance the VDOL's outreach and education materials (see 4, above); c. Identify and disseminate the training providers and classes for ESL educational opportunities; d. Enhance VDOL's wage, hour and employment practices materials and services to help ELL ensure their rights in the workplace; e. Train VDOL staff and partner agencies' staff to assist ELL in utilizing the programs and services of the state workforce system and other education, training and workforce

development programs. VDOL's and its partner's goal in serving the ELL (New Americans) population is to provide a career pathway that is rewarding and improves the lives of ELL residents.

IV. Coordination with State Plan Programs

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

The VDOL, AOE, and DVR will work in partnership to carry out the goals of this State Plan. Most important to a successful implementation is the continued communication among the core partners at all levels of administration. In order to keep the communication lines open and to facilitate the implementation of this plan the partners will meet on a quarterly basis. Concurrently, the regional managers of each core program will schedule to meet on a regular basis to develop professional relationships, discuss best practices, and review compliance with the State Plan. The core partners will be responsible to ensure the regional offices are implementing the policies and procedures developed by the SWDB. Additionally, the partners are committed to the following:

- Development of workforce training and education programs clearinghouse.
- Inter-agency training.
- Universal intake and referral.
- Co-enrollment of customers.
- Collaborative outreach and business services.

These activities are described in detail below.

Once established, the core partners intend to expand the coordination and alignment of State strategies to include other workforce development partners, ensuring that all services are available to Vermonters, especially those with barriers to employment. This will take the form of MOUs between the core partners and other State programs, including required one-stop partners. Additionally, the core partners hope to expand the use of a unified referral process with other partner programs to better facilitate co-case management. Furthermore, the core partners intend to utilize the Supplemental Nutrition Assistance Program, Education and Training grant to test new strategies to support return to work for the chronically underserved populations. This grant is a partnership between DCF, VDOL, DVR, and the Community College of Vermont to provide comprehensive return to work services for beneficiaries who are recent offenders, have substance abuse disorders, or are homeless. The VDOL will partner with the Learning Works partner programs to increase success for registered apprenticeship program candidates in the State. This will include jointly establishing a minimum basic skills requirement for success in the apprenticeship and pre-apprenticeship programs, and aligning this to approved standardized basic skills assessment instruments in use. Candidates can be advised of the importance of surpassing this skill level, and introduced to adult education and literacy programs for basic skills assessment and the accompanying instructional support to improve skills. For example, it is noted that basic mathematics concepts represent barriers to completion for some participants enrolled in pre-apprenticeship and apprenticeship programs. VDOL and Learning Works partners can work together to establish that all program participants have a certain minimum TABE math score for success in the program. When a candidate tests below the level, he or she can take advantage of relevant instructional support to build basic math skills through the adult education and literacy programs while they are engaged in the pre-apprenticeship or apprenticeship program; thus addressing a barrier to completion.

The Core Partners are each committed to providing comprehensive, high-quality, customer-centered services to Vermonters. This will require each partner to become familiar with each other's programs and services to ensure that a customer has all tools available to him or her, regardless of where he or she enters the workforce development system. In order to facilitate this, the partners are committed to the following activities to align services to individuals: cross training, common referral, and better communication. The WIOA requires, and Vermont is committed to, a comprehensive one-stop delivery system. However, not all Vermonters engage the workforce development system through the American Job Centers. In order to ensure Vermonters have access to all available services, each partner is committed to a cross training program to familiarize staff with individual department program services. Cross training of staff will occur annually and on a regional basis. For new staff, orientation will include an introduction to all core partner programs and services. This cross training will help to facilitate a transition of customers from program to program for better education and training outcomes for individuals. This should also include training to identify, address, and resolve implicit bias and stereotypes to help expand access to all Vermonters. Additionally, the core partners are committed to developing a universal referral process for common customers to be used for expanded and coordinated case management. There are areas of overlap in service that will be better coordinated with a common referral process. This common referral will follow the customer from program to program, identifying the services provided by each partner. As each partner becomes more familiar with each other's services, individuals will be able to access each program's services regardless of where they enter the workforce development system. Finally, in order to facilitate coordinated service to individuals, each partner is committed to more effective communication among the partner programs. The partners are committed to a concentrated effort to share information and resources amongst each other. The partners plan to explore joint case management strategies similar to what is used with postsecondary education plans developed under the economic services department. In developing a plan, the customer must visit and discuss the plan with multiple state programs, i.e., Vermont Student Assistance Corporation, the VDOL, the DVR, and state educational institutions. The programs work in collaboration to ensure the participant's educational plan will provide the participant with the best opportunity to succeed. Additionally, each program must sign off of the plan in order for the participant to get final approval and funding. This type of collaboration must be expanded to other areas of the workforce development system in order to ensure the success of Vermont participants and avoid the duplication of services.

Employer engagement is just as important to the success of the Vermont workforce development system as are individual services. Both the VDOL and the DVR engage Vermont employers to meet their workforce needs. These activities must be better aligned and coordinated to ensure Vermont employers are getting the most out of Vermont's workforce development system. The VDOL and DVR are committed to coordinated employer outreach and marketing to ensure the needs of employers are being met. Arguably the most important aspect of employer services is knowing the employer needs within the State. The mismatch in workforce skills was acknowledged as a major issue in the Economic Development Strategy produced by the Vermont Agency of Commerce and Community Development in 2014. The VDOL and ACCD, in consultation with other workforce development partners, are currently developing a workforce needs assessment to survey Vermont businesses to better understand the needs of employers in the State. This outreach should be conducted in consultation with the DVR in order to ensure the workforce needs of all employers are identified, including those employers who employ individuals with disabilities. Additionally, both the VDOL and DVR will conduct job fairs, hiring events, and provide job seeker referrals in coordination. The VDOL and DVR will develop protocols to ensure that employer outreach is jointly conducted. Included among these protocols are joint job fairs and business recognition events, as well as holding regular meetings between the partner employment representatives to share contacts and local outreach activities. The VDOL and DVR will further expand partnerships with local workforce development leaders. Although Vermont is a Single State Area with one SWDB, there are numerous local partners with extensive knowledge of local employers. The core partners intend to engage these local leaders to help in identifying skill gaps and developing training pipelines to meet the needs of local businesses.

V. Common Assurances (for all core programs)

The Unified or Combined State Plan must include assurances that—

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

VI. Program-Specific Requirements for Core Programs

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

Program-Specific Requirements for Adult, Dislocated Worker, and Youth Activities under Title I-B

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

a. Adult, Dislocated Worker, and Youth Activities General Requirements

1. Regions and Local Workforce Development Areas

A. Identify the regions and the local workforce development areas designated in the State.

Vermont operates as a Single State Local Area under the WIOA. Because of its size and population, the State does not designate regions or local workforce development areas. It is more efficient and equitable for Vermonters to have a similar statewide workforce development system. The SWDB ensures this system is available to all Vermonters throughout the State through the 12 job centers located in the following areas: Barre, Bennington, Brattleboro, Burlington, Hartford/White River Junction, Middlebury, Morrisville, Newport, Rutland, St. Albans, Springfield, and St. Johnsbury.

B. Describe the process used for designating local areas, including procedures for determining whether the local area met the criteria for "performed successfully" and "sustained fiscal integrity" in accordance with 106(b)(2) and (3) of WIOA. Describe the process used for identifying regions and planning regions under section 106(a) of WIOA. This must include a description of how the State consulted with the local boards and chief elected officials in identifying the regions.

Because of Vermont's size, it is a single-region state and does not designate separate local areas.

C. Provide the appeals process referred to in section 106(b)(5) of WIOA relating to designation of local areas.

Vermont is a single-region state.

D. Provide the appeals process referred to in section 121(h)(2)(E) of WIOA relating to determinations for infrastructure funding.

Section VI of "Guidance in Negotiating Costs and Services of Vermont's Comprehensive One Stop Service Delivery System under the Workforce Innovation and Opportunity Act of 2014 (WIOA)" issued by Governor Scott on June 30, 2017 states:

If a required one-stop partner disagrees with the Governor's decision about the partner program's contribution to the one-stop infrastructure funding, it may appeal the decision within 10 business days. Appeals shall be made in writing to the SWDB and shall describe the basis for objection, propose an agreeable contribution amount, and supply relevant information for the SWDB to make an informed decision. The SWDB shall consider the appeal and, at the Chair's discretion, may make a determination by action of the Operating Committee or majority of the entire board. The appealing partner shall be notified in writing of the SWDB's decision to uphold the Governor's determination or otherwise alter the partner's required contribution amount within two weeks. The SWDB's determination shall be final.

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.

The State shall follow all applicable federal and state regulations and guidance pertaining to the use of each individual funding source for workforce investment activities.

B. Describe how the State intends to use Governor's set aside funding. Describe how the State will utilize Rapid Response funds to respond to layoffs and plant closings and coordinate services to quickly aid companies and their affected workers. States also should describe any layoff aversion strategies they have implemented to address at risk companies and workers

Governor's Set Aside Funding Vermont supports the following activities:

- o Assist state entities, one-stop partners and other stakeholders with the development, coordination implementation and alignment of services for statewide employment and training activities, including: data systems, common intake forms and procedures; case management; information and services referrals; industry or sector partnerships; coordination of staff training; program development, technical assistance, fiscal and management accountability, monitoring and oversight of activities;
- o Ensure effective service delivery strategies for workers and job seekers through career services including job counseling, job development, skill and aptitude assessment; education; job training; job search and placement assistance; support services; follow up services;
- o Coordinate and provide job training programs and activities for persons with significant barriers to employment including, but not limited to, persons with disabilities, unemployed, under-employed, veterans, persons on public assistance programs, women, minorities, at-risk youth, dislocated and trade adjusted workers and ex-offenders;
- o Implement programs to increase the number of individuals training for and placed in non-traditional employment, including internships, work experiences, workforce preparation activities, pre-apprenticeship and apprenticeship opportunities;
- o Coordinate activities with state and regional economic development and regional planning activities;
- o Coordinate and provide business services for Vermont employers; develop plans for effective outreach to and partnerships with Vermont businesses;
- o Disseminate the list of eligible training providers, and information on OJT, customized training, incumbent worker training, internships, work experience or transitional jobs, providing information on the costs, performance, physical and programmatic accessibility of training programs; and
- o Implement programs to increase the number of women training for and placed in nontraditional, high-demand, high-paying fields.

Vermont may utilize some reserve funds for additional statewide employment and training activities including;

- o Implementing innovative programs and strategies that align with real-time labor market analysis to meet employer needs, including worker-training programs;
- o Career pathway programs;
- o Developing remote access to services through the use of technology;
- o Financial literacy programs; and
- o Supporting job training through adult education system or through agricultural cooperative extension programs.

The VDOL has Rapid Response teams that is committed to a swift and inclusive response to any layoff or business closure in the State. The VDOL finds out about business downsizes and closure in different ways, whether it's through public notifications or WARN notices, or simply employees walking in to a career resource center indicating they were displaced from their employment. In addition, because the VDOL houses both the UI compensation and workforce development divisions, the VDOL is able to get information regarding layoffs through UI claims filings. This information is communicated to the WDD in a timely manner. Then, the WDD begins an inquiry into whether there has been a layoff and whether there is a need for a rapid response event. Regardless of how the VDOL discovers a layoff or closing, the Rapid Response team immediately mobilizes and begins planning rapid response activities. The local career resource center staff contact the employer to discuss relevant separation information and begin communication with the effected employees. Whether or not an employer is willing to work with the VDOL on their displaced employees does not have any impact on the timeliness or effectiveness of the rapid response team. For every closure or layoff, the VDOL holds a rapid response outreach event. Depending on the number of effected workers, the outreach event can be held in the local office or, when necessary, at a location more accommodating. The VDOL coordinates with a system of partners to ensure the effected workers have quality information to quickly transition to new employment. This service delivery presentation includes the following: unemployment information, labor market information, workforce development information, as well as information from the community partners, healthcare, and the state college system. Using Rapid Response funds, the VDOL holds specialized hiring events and provides customized employment service plans to address the needs of affected workers and the long term unemployed. These specialized events are connection points to gather employers, job seekers, and community partners, such as

educational providers, in the same location. These events are usually for specific sector employers to help affected workers quickly transition into new employment but also allow the VDOL to incorporate layoff aversion strategies by targeting employers who need workers and connecting them with individuals who can take advantage of the workforce development system to transition into new employment.

Rapid Response funds will be used to prevent layoff aversion, and provide aid to companies and their affected workers in the event of disaster, mass layoff, plant closings, or other events that result in increased unemployed individual in the state or local area. In these cases, the Department of Labor uses funds for the following purposes:

- Orientation and meetings for displaced workers, which include unemployment compensation, veteran's services, and training and labor exchange resources;
- Provide layoff aversion;
- Space for service delivery presentation;
- Publications, announcements, and resource materials;
- Customized job fairs for long term unemployed;
- Specialized hiring events; and
- Customized workshops.

C. In addition, describe the State policies and procedures to provide Rapid Responses in cases of natural disasters including coordination with FEMA and other entities.

NATURAL DISASTER COORDINATION The most important aspect to providing an effective response during a disaster event is broad-based coordination with local and national partners. Local partners in Vermont include municipalities, town organizations like the Vermont League of Cities and Towns, and State agencies. The State agencies involved in natural disaster relief efforts are notably the Department of Public Safety, which is the lead Vermont agency for statewide disaster response activities, the Agency of Transportation, and the Agency of Human Services. The national partners include the National Guard and the Federal Emergency Management Agency (FEMA), particularly in regards to National Dislocated Worker Grants (DWGs). The VDOL Rapid Response Team coordinates with these partners in order to determine the needs of those affected and the resources available.

When responding to a natural disaster, the State follows the WIOA dislocated worker and DWG guidelines. Disaster DWG funds are sought to provide funding to create temporary employment opportunities to assist with clean-up, recovery, and other humanitarian efforts in one of three situations. First, when an area impacted by disaster is declared eligible for public assistance by FEMA; second, when another federal agency with jurisdiction recognizes the disaster as one of national significance that could result in a potentially large loss of employment; and third, when a substantial number of individuals, defined as 50 or more, relocate to another area from a disaster area. The VDOL is the agency eligible to apply for a Disaster DWG in Vermont, because it is designated to receive Dislocated Worker formula funds. In addition, the VDOL is also the fiscal agent responsible for the appropriate allocation of funding to the affected areas. As such, the VDOL Rapid Response Team carries out its disaster response within the parameters of the Disaster DWG guidelines, and in coordination with state and national entities such as FEMA.

Vermont has recent experience in responding to a major natural disaster, on account of Hurricane Irene in 2011. During Irene, the VDOL reached out to coordinate with local disaster relief centers, municipalities, and local businesses to identify both needs and available resources. As part of its outreach and coordination efforts, the VDOL provided the information regarding the services available, and the filing timelines for the following programs:

- disaster unemployment insurance;
- national disaster grant funding; and
- programs administered by the VDOL.

Additionally, the VDOL recruited unemployed Vermonters to create work crews that were placed around the State to provide anything from clean-up services and equipment to administrative services such as payroll. In the event of another natural disaster, the VDOL would implement a similar playbook regarding VDOL Rapid Response and Disaster DWG services.

D. Describe how the State provides early intervention (e.g., Rapid Response) to worker groups on whose behalf a Trade Adjustment Assistance (TAA) petition has been filed. (Section 134(a)(2)(A).) This description must include how the State disseminates benefit information to provide trade-affected workers in the groups identified in the TAA petitions with an accurate understanding of the provision of TAA benefits and services in such a way that they are transparent to the trade-affected dislocated worker applying for them (Trade Act Sec. 221(a)(2)(A) and Sec. 225; Governor-Secretary Agreement). Describe how the State will use funds that have been reserved for Rapid Response to provide services for every worker group that files a TAA petition.

As the administrator of Trade Adjustment Assistance Act services, the VDOL is able to quickly address the needs of trade-affected workers. When the VDOL becomes aware of a layoff event, either through an individual or upon notification by a company, several actions are taken. VDOL staff immediately contacts the business to investigate the information. Then VDOL staff schedule a Rapid Response presentation in order to inform the affected workers of the services available to them through the American Job Centers, including Wagner-Peyser, WIOA employment and training, education and unemployment insurance. VDOL staff reach out to the employer implicated in the layoffs to determine if the employer is willing to hold the presentation on the employer's premises and how best to schedule the session. If it is not feasible to hold the presentation at the employer's worksite, the VDOL schedules the presentation at AJCs or elsewhere, depending on the size of the event and the number of affected workers. The VDOL uses Rapid Response funds to carry out these pre-certification activities for worker groups.

VDOL staff gather information from the workers and employers to determine whether Trade Adjustment Assistance may be applicable. If that is the case, then the VDOL files a petition on behalf of the trade-affected workers to request an eligibility verification from USDOL, and receives either a certification or denial. When a federal TAA petition certification is granted, the VDOL notifies workers in writing of the federal certification of the TAA petition, and informs the workers of the services to which they are entitled. The VDOL also organizes public informational presentations on the workforce development services available to workers, and the ability of the AJC staff to assist them with re-employment. The VDOL publicizes the schedule of the presentations by directly contacting workers by letter, email, or phone, by issuing press releases, and posting notices on the VDOL website. At the informational presentations, VDOL staff engage with workers to schedule individual meetings with case managers. Staff from the

VDOL's unemployment insurance division are also present to present the services available, and inform workers the filing dates and deadlines.

The VDOL works to ensure that TAA workers are informed of and receive every service available, including co-enrollment in the WIOA dislocated worker and other programs. These services include case management through the provision of basic and individualized career services in the AJCs. The focus is on skill-assessment and retraining workers who need further skills in order to obtain employment in emerging, in-demand occupations. As the WIOA Title I administrator, the VDOL is especially well placed to ensure the alignment and coordination of funds and activities between WIOA adult and dislocated worker programs, and the statewide Rapid Response activities. This is due to the administration of the Rapid Response outreach events, including job fairs or hiring events, by the same division responsible for administering the WIOA adult and dislocated worker programs. The VDOL is consequently able to leverage WIOA Title I program resource in response to a layoff or facility closure. This dual-program role enables the VDOL to combine dislocated worker activities with TAA activities for trade-affected workers, helping to avoid duplication of services.

b. Adult and Dislocated Worker Program Requirements

1. Work-Based Training Models

If the State is utilizing work-based training models (e.g. On-the-job training, Incumbent Worker training, Transitional Jobs, and Customized Training) as part of its training strategy and these strategies are not already discussed in other sections of the plan, describe the State's strategies for how these models ensure high quality training for both the participant and the employer.

There are various types of work based training in Vermont, which include on-the-job training (OJT), transitional jobs, apprenticeships, and customized training. Transitional jobs are a type of work based learning that are time-limited, subsidized work experiences in private, public or non-profit sectors. They are intended for individuals with barriers to employment who are chronically unemployed or have an inconsistent work history. The goal of this model is to establish a work history for the individual in order to demonstrate their success in the workplace, and to develop skills that will lead to their entry into and retention in unsubsidized employment.

The VDOL utilizes alternative training models as part of its job training strategy. However, there is no one model that fits every training situation. As a result, Vermont utilizes these strategies based on the current needs of employers and based on the workforce industry. For these alternative models, the VDOL works with the employer to develop a training contract to ensure the needs of the employer and employee(s) are met. The contract document is intended to be comprehensive to ensure that both the employee receives high-quality training and the employer receives a highly qualified employee. This includes case management of the participant, including frequent communication with the participant and monthly on-site visits to ensure the grant document is being implemented.

The Vermont Department of Labor was also awarded a \$2.9 million American Apprenticeship Initiative grant to lead the Accelerate ApprenticeshipVT (AAVT) Initiative. AAVT partners include Dartmouth-Hitchcock and the Vermont SWDB, who will collaborate to expand on the success of the Vermont HITEC apprenticeship model. HITEC conducts accelerated pre-apprenticeship education programs at no cost to participants, leading directly to immediate employment in a Registered Apprenticeship. Through this public-private partnership, 300 unemployed and underemployed participants will enter Registered Apprenticeships and career pathways in the H-1B target industries of healthcare, information technology, advanced manufacturing and business services throughout Vermont.

2. Registered Apprenticeship

Describe how the State will incorporate Registered Apprenticeship into its strategy for service design and delivery (e.g., job center staff taking applications and conducting assessments).

The VDOL is the registration agency of the VT Registered Apprenticeship program. The goal of the Registered Apprenticeship program is to develop and expand training for high-demand and high-wage jobs. We must also maintain the integrity and support of the current Registered Apprenticeship programs.

The Vermont Registered Apprenticeship program is one of the VDOL's most effective workforce training models. The combination of paid, hands-on-training under a qualified employer/sponsor and the related technical instruction ensures that the training is relevant, current and directly tied into employment. All Registered Apprentices are employed full-time in their occupation. A progressive wage scale is written into the formal apprenticeship agreement. As the apprentice gains more skills and knowledge of the occupation, they are more valuable to the employer and this results in a higher wage for the apprentice. The VDOL is able to use WIOA funds to develop on-the-job training contracts as a tool to place eligible workers into Registered Apprenticeship programs.

The Vermont Registered Apprenticeship program is supported by a combination of State general funds and "special" funds that consist of employer-funded tuition for classroom instruction. Related instruction may be delivered in a variety of formats. In the plumbing and electrical trades, the VDOL contracts with VT Technical College to deliver the related instruction. Most apprentices attend their classes at a local CTE or at VTC in Williston or Randolph. In other occupations, students may attend classes delivered by their employer. The Plumbers & Pipefitters Union delivers their classes at their union training center. The VT Electricians Union apprentices are enrolled in the classes offered by VTC. Their education is supplemented with classes at their union training center.

Dislocated workers and unemployed individuals, including adults new Americans and youth, are informed and encouraged to apply for Registered Apprenticeship opportunities as a career pathway through job fairs, career center activities and on the VDOL website. Many VT Registered Apprenticeship sponsors recruit with the VDOL's AJC network for Registered Apprenticeship. The Registered Apprenticeship staff meet with high schools, CTE's, high school counselors, parents and Tech Center staff to relay the value of Registered Apprenticeship. The VDOL Registered Apprenticeship staff have participated in presentations with VT Senator Bernie Sanders at some high schools and colleges throughout the state. The goal of these presentations is inform high school students of the options available to them and ensure that they have the necessary information to make whether or not, they choose college or a career pathway. The Registered Apprenticeship staff has been participating in the VSAC College & Career Pathways events hosted at St. Michael's College, Northern VT University/Johnson and Castleton University. The goal is to introduce students and their parents to other career paths that can build on the individual student's career goals utilizing their unique strengths, skills and talent. They are able to learn how their aptitudes might fit into Registered Apprenticeship occupations. Students are exposed to opportunities for development and training in high-demand and high-wage jobs.

The VDOL was awarded a \$2.9 million American Apprenticeship Initiative grant to lead the Accelerator Apprenticeship VT (AAVT) Initiative. AAVT partners include UVM Medical Center, Dartmouth-Hitchcock and the VT SWIB who collaborate to expand on the success of the Vermont HITEC apprenticeship model. Vermont HITEC conducts accelerated pre-apprenticeship education programs at no cost to participant. Successful completion of the pre-apprenticeship program leads to an immediate job. Through this public-private partnership, 300 unemployed and underemployed participants will enter Registered Apprenticeship and career pathways in the H1-B target industries of healthcare, information technology, advanced manufacturing and business services throughout Vermont.

The VDOL is also working in cooperation with the Agency of Education, specifically the Adult Education programs, to ensure that participants in Vermont Registered Apprenticeship receive basic remedial education while participating in OJTs. This ensures that the adults in the OJT's are prepared to successfully complete the Registered Apprenticeship program. The VDOL will work with AOE to ensure that information regarding Registered Apprenticeship, including pre-apprenticeship, is shared in adult and technical education centers throughout Vermont.

The Vermont Technical College is a member of the Registered Apprenticeship College Consortium (RACC). The RACC exists to simplify the granting of college credit for the Registered Apprenticeship programs. The RACC criteria constitute an operational framework for RACC member institutions to extend undergraduate educational opportunities to apprentices. Students who participate in Registered Apprenticeships and seek to complete a degree program at VTC are able to minimize the loss of credit and avoid duplication of coursework through the framework of the RACC. Participants in the VT HITEC training models receive college credits from Columbia College in Columbia South Carolina.

3. Training Provider Eligibility Procedure

Provide the procedure, eligibility criteria, and information requirements for determining training provider initial and continued eligibility, including Registered Apprenticeship programs (WIOA Section 122).

The VDOL developed the WIOA Training Providers Eligibility Procedures, and shared them with Vermont's eligible training providers. The VDOL is reaching out to apprentice sponsors to determine their interest in joining the Vermont Eligible Training Provider List. Registered Apprenticeship programs are not required to submit applications for inclusion on the Eligible Training Provider List, but will be subject to reporting requirements as determined by the VDOL in consultation with the SWDB. The procedures were last updated in December 2016. The current procedures are as follows below.

Section 1: Purpose:

The Workforce Innovation and Opportunity Act (WIOA) section 122 requires States to approve a training provider's eligibility before WIOA funds can be used to pay for the provision of training services. The State, in consultation with the State Workforce Development Board (SWDB), is charged with developing the process for determining how training providers may qualify for inclusion on Vermont's Eligible Training Provider List (ETPL). The procedures outlined in this document will provide information on the eligible training provider application process. The ETPL will be made available to the SWDB, WIOA participants, and members of the public.

Section 2: Qualifications:

To be eligible to receive funds for the provision of training services, a provider shall be one of the following:

- (1) An institution of higher education that provides a program that leads to a recognized post-secondary credential;
- (2) An entity that carries out programs registered with the Vermont Department of Labor, Apprenticeship Division; or

(3) Another public or private provider of a program of training services, which may include joint labor-management organizations, and eligible providers of adult education and literacy activities under title II of WIOA if such activities are provided in combination with occupational skills training.

A "program of training services" is one or more courses or classes, or a structured regimen that leads to:

- (1) A recognized post-secondary credential¹, secondary school diploma or its equivalent;
- (2) Employment; or
- (3) Measurable skill gains toward such a credential or employment.

Section 3: Identification of Respective Roles:

The State of Vermont is designated as a single State local area and, therefore, the State Workforce Development Board operates as both the State and local workforce development board. The State has designated the Vermont Department of Labor (VDOL) to assist in carrying out the process and procedures for determining the eligibility of training providers. All applications for addition to the ETPL shall be submitted to the Vermont Department of Labor for approval. Training providers approved under these procedures shall be included on the ETPL. The VDOL shall notify the SWDB of any updates to the ETPL at each SWDB meeting

Section 4: Initial Eligibility Procedures:

To be included on the Vermont ETPL, all training providers and programs, not previously eligible to provide training services, shall provide the required information to the VDOL. The VDOL shall review the application, make a determination of approval, and notify the applicant of the determination within 30 days of receiving the completed application. The VDOL shall notify the applicant of the final determination in writing, including, in the case of a denial, reasons for the final determination and a statement that the provider may appeal the decision as provided in these procedures. The applicant may appeal the determination of the VDOL using the appeals procedures outlined in section 10 of this document.

Applicants approved under this section will receive initial eligibility for one (1) fiscal year. If the applicant wishes to continue providing training services, the applicant shall apply for continued eligibility as provided in this document.

The following information is required for an initial eligibility determination:

- 1) A completed application²;
- 2) A copy of the provider's refund, equal employment opportunity and accessibility policies;

- 3) A current class schedule; and
- 4) Any additional information requested by the VDOL.

An initial eligibility determination will be decided for each training provider on a **program by program** basis and be based on the following criteria:

- A training provider's prior eligibility status or status of existing programs.
- The ability of the training provider to meet minimum performance levels based on the State Plan's performance measures required by the U.S. Department of Labor.
- Compliance with Vermont labor laws, such as workers' compensation, unemployment insurance, wage and hour, and nondiscrimination.
- The degree to which the program relates to in-demand industry sectors and occupations in the State.

Section 5: Continued Eligibility Procedures:

All training providers shall annually apply to remain on the ETPL by submitting a completed application along with the required information. The VDOL shall review the application, make a determination of approval, and notify the applicant of the determination within 30 days of receiving the completed application. The VDOL shall notify the applicant of the final determination in writing, including, in the case of a denial, reasons for the final determination and a statement that the provider may appeal the decision as provided in these procedures. The applicant may appeal the determination of the VDOL using the appeals procedures outlined in section 10 of this document. Any training provider that does not apply to remain shall be removed from the ETPL.

The following information is required for a continued eligibility determination:

- 1) A completed application;
- 2) Performance Reports for the past two years, as applicable; and
- 3) Certification that the following have not changed from previous years: the provider's refund, equal employment opportunity and accessibility policies, and the class schedule. If changes have occurred new copies shall be provided.
- 4) Any additional information requested by the VDOL.

A continued eligibility determination will be decided for each training provider on a **program by program** basis and be based on the following criteria:

- A training provider's prior eligibility status or status of existing programs.
- The performance of training providers on the performance accountability measures relating to the State Plan and the training provider's individual performance measures established by the VDOL.
- The availability of training services throughout the State.
- Information reported to State Agencies with respect to Federal and State programs involving training services, including the adult education and vocational rehabilitation programs.
- The degree to which the program relates to in-demand industry sectors and occupations in the State.
- Compliance with State licensing requirements, where applicable.
- The ability of the training provider to offer quality programs that lead to post-secondary credentials.
- The ability of the training provider to provide training services to individuals who are unemployed, underemployed, incumbent workers and individuals with barriers to employment.
- Demonstrated ability of the training provider to submit timely and accurate performance reports.
- Continued compliance with Vermont labor laws, such as workers' compensation, unemployment insurance, wage and hour, and nondiscrimination.
- A training provider's ability to meet the State Plan's performance measures required by the U.S. Department of Labor.

Section 6: Registered Apprenticeship Programs:

Pursuant to section 122(a)(3) of the WIOA, apprenticeship programs registered with the Vermont Department of Labor, Apprenticeship Division are automatically eligible to be included on the ETPL. Although registered apprenticeship programs are automatically eligible, the program will not be included on the ETPL unless the program provider notifies the Apprenticeship Division of its intention to be included on the ETPL.

The Apprenticeship Division will notify every apprenticeship program, registered as of the date of enactment of these procedures, to determine whether the program provider wants to be included on the ETPL. New apprenticeship programs that want to be included on the ETPL shall indicate this intention on

the apprenticeship program application. Once an apprenticeship program is registered on the ETPL, the program will remain on the ETPL until the program is no longer registered with the Apprenticeship Division or until the provider notifies the Apprenticeship Division, in writing, of the intention to be removed from the list.

Registered apprenticeship programs are not required to submit initial or continued eligibility applications under these procedures. Registered apprenticeship programs are required to comply with all laws and rules regarding apprenticeship programs and labor laws in the State of Vermont.

Pursuant to section 122(a)(3) of the WIOA and 20 C.F.R. § 677.230(b), registered apprenticeship programs are not required to do either of the following: submit performance information in order to be included on the ETPL; or comply with the ETP performance report required by section 116(d)(4) of the WIOA. However, a registered apprenticeship program may voluntarily submit performance information to the State, in which case the State must include this information in the performance report.

Section 7: On-the-Job Training, Customized Training, Incumbent Worker Training, and Other Training Exceptions:

Pursuant to section 122(h) of the WIOA, providers of on-the-job training, customized training, incumbent worker training, internships, paid or unpaid work experience opportunities, or transitional employment, as those terms are defined in WIOA, are not subject to the procedural requirements outlined in this document. Providers of these programs should consult with the VDOL, Workforce Development Division about the process to be identified as eligible providers of training services. If eligible, these programs shall submit such performance information and meet performance criteria as determined by the VDOL.

Section 8: Additional Requirements:

Eligible Training Providers are subject to applicable requirements in the WIOA as well as any applicable Federal and State laws and regulations, including the requirement to submit performance reports as required by WIOA section 116(d)(4).

Section 9: Enforcement:

Upon a determination by the VDOL that a training provider, or individual providing information on behalf of the provider, intentionally supplied inaccurate information or substantially violated any requirements of WIOA, any VDOL rule or regulation, or any State or Federal labor law, eligibility shall be terminated for a period of not less than 2 years. A training provider whose eligibility is terminated under this section shall be liable for the repayment of funds received during the period of violation. This section is construed to provide remedies and penalties that supplement, but shall not supplant, any additional civil and criminal remedies and penalties.

The VDOL shall notify a training provider in writing when the Department opens an investigation under this section. The notification shall include a brief description of the nature of the investigation and a reference to the applicable laws and rules, including these procedures.

The VDOL shall notify a training provider in writing upon a final determination of an investigation under this section. The notification shall include a detailed description of the investigation, reasons for the final determination, a reference to the applicable laws and rules, including these procedures, any penalties, including eligibility status and repayment amounts, and a statement that the provider may appeal the determination as provided in this document.

Any training provider determined to violate this section may appeal the determination of the VDOL as provided in section 10 of this document.

Section 10: Appeals:

Within 15 calendar days after receipt of a denial or termination of eligibility, a training provider may file a written request to receive an appeal by a formal hearing. The VDOL Commissioner will appoint a Hearing Officer (HO), or similar entity, to oversee any complaint hearing, and will ensure that the HO has the qualifications, skills, and abilities to fairly, accurately, and without bias, assess the information and determine the facts. A hearing shall be scheduled on a date and time mutually acceptable to the parties, but no later than 30 days after receiving the written request for a hearing. The hearing shall include an opportunity for the applicant to submit written and verbal information to the presiding HO. The hearing shall be conducted in a fair and impartial manner. The Hearing Officer shall issue a decision within 60 calendar days from the date of the hearing informing both parties (the complainant and respondent) of the decision. The decision of the HO or presiding entity shall be final.

Section 11: Waiver from Additional Information Request:

If the VDOL requests additional information as part of the application, other than what is required by the WIOA or applicable regulations, a training provider may request, in writing to the VDOL Commissioner, a waiver from the additional information request. To be granted a waiver, a training provider must be able to demonstrate that providing the information would be unduly burdensome or costly. If the Commissioner determines that the provider has demonstrated such extraordinary costs or undue burden, the VDOL shall provide access to cost-effective methods for the collection of information. Nothing in this section permits a training provider to request a waiver from any required information.

Section 12: Out-of-State Providers:

An out-of-state training provider wishing to provide training services within the State of Vermont shall comply with the procedures outlined in this document. Any out-of-state training provider wishing to offer Vermont WIOA participants training services outside of Vermont should contact the VDOL, Workforce Development Division for further information.

4. Describe how the State will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program.

VJL, VDOL's MIS program, will track and report the priority recipients are being served in accordance with WIOA requirements.

VDOL's WIOA strategy calls for a much deeper relationship with Vermont's TANF programs. As an example, VDOL partners with Vermont's SNAP program to assist those individuals in obtaining the training and career enhancement resources they need to successfully enter the labor force. VDOL is also working closer with the Vermont Department of Corrections to engage those individuals who are leaving supervision and entering their respective communities. Additionally, the VDOL is engaged in the war to remediate the opiate crisis by imbedding VDOL staff members in recovery centers to assist them with making career choices.

5. Describe the State's criteria regarding local area transfer of funds between the adult and dislocated worker programs.

Section 133(b)(4) of WIOA and 20 C.F.R. § 683.130 authorize local workforce areas, after obtaining the written approval of the Governor, to expend up to 100 % of the Adult Activities funds on Dislocated Worker Activities, and up to 100 % of Dislocated Worker Activities funds on Adult Activities. No funds may be transferred to or from the Youth program. The Governor's written approval must be based on criteria or factors that the Governor has established in a written policy, such as the present State Unified Plan.

Under WIA, the VDOL operated under a waiver of the threshold set out in 20 C.F.R. § 667.140 that limited fund transfers between the Adult and Dislocated Worker programs to 20 % of the program year allocation. The waiver authorized the VDOL to transfer up to 50 % of the program year allocation between the two programs. The justification for this waiver was to provide greater flexibility to the VDOL in allocating and spending Adult and Dislocated Worker funds in the State on employment and training activities in order to better serve the needs of all customers, including individuals, businesses, and employers, and to heighten the State's

ability to respond to changes in the local labor market. Typically, transfers between the programs only went one way: from the Adult program to the Dislocated Worker program. This was due to the unpredictable nature of the events that cause worker dislocation, which can never be fully anticipated in advance.

As Vermont is a single state workforce area, and the VDOL administers both the Adult and Dislocated Worker programs for the entire State, it would be impossible to transfer 100 % of the funds from one program to the other and adequately serve both program populations. Therefore, the VDOL does not anticipate having a need to transfer the full 100 % of funds between programs. However, given the historical use of transfers from the Adult program to the Dislocated Worker program, there will likely still be a future need for fund transfers; but the transfers will be less than 100 % of the program year allocation. To determine whether a transfer is appropriate, the VDOL will identify the number of dislocated workers in need of services, and the amount of Adult program funds that are available for transfer without jeopardizing the quality of Adult employment and training activities provided. Prior to transferring funds, the VDOL will obtain the Governor's written approval.

c. Youth Program Requirements

With respect to youth workforce investment activities authorized in section 129 of WIOA,—

1. Identify the State-developed criteria to be used by local boards in awarding grants or contracts for youth workforce investment activities and describe how the local boards will take into consideration the ability of the providers to meet performance accountability measures based on primary indicators of performance for the youth program as described in section 116(b)(2)(A)(ii) of WIOA in awarding such grants or contracts.*

* Sec. 102(b)(2)(D)(i)(V)

As a single-area State, the Vermont SWDB carries out many of the local board functions, and as a result, has the authority to select providers of youth workforce investment activities. Youth service providers have not previously been selected on a competitive basis in Vermont, because the VDOL has operated the Youth program under a waiver of the competitive selection requirement since 2001. The purpose of this waiver has always been to accommodate the unique and challenging characteristics of a rural state, notably a lack of formal statewide service infrastructures commonly present in more heavily populated states.

Under WIOA § 123(a) and 20 CFR § 681.400(b), the general rule is that youth service providers must be selected on a competitive basis. However, the final rule provides new flexibility. In addition to a sole source option, there is also expanded scope for the grant recipient/fiscal agent to provide directly some or all of the youth workforce investment activities under 20 CFR § 681.400(a). As the Youth program grant recipient/fiscal agent in Vermont, the VDOL could be designated as the youth service provider, and the competitive selection requirement would not apply to those youth services provided by the VDOL. These three options (competitive procurement, sole source procurement, and direct provision of services by the grant recipient/fiscal agent) are currently under consideration by the Vermont SWDB.

The Standing Youth Committee made the recommendation to the Operating committee, that VDOL be designated as the youth service provider for youth workforce investment activities including; performance measures. The SWDB accepted and approved the recommendation for VDOL to be the designated youth service provider for youth workforce investment activities.

Additionally, when funds are available the VDOL does provide competitive grants for summer employment opportunities (SEOs). In doing so, the VDOL uses the State request for proposal process and posts the grant award on the VDOL and the Department of Buildings and General Services' websites. The VDOL also notifies known entities that serve at-risk youth. Grant SEO applicants are required to include both an academic and an occupational component in their proposal, and to provide alternative methods for learning. This program was designed to help the most at-risk youth by providing them with summer opportunities in order to keep them away from dangerous activities, and to continue their academic progression. In awarding the SEOs, the SWDB Youth Committee reviews and discusses the proposals, and makes a recommendation to the Chair of the SWDB and the Commissioner of Labor.

2. Describe the strategies the State will use to achieve improved outcomes for out-of-school youth as described in 129(a)(1)(B), including how it will leverage and align the core programs, any Combined State Plan partner programs included in this Plan, required and optional one-stop partner programs, and any other resources available.

The VDOL recognizes that successful implementation of WIOA's purposes rests on youth programs that reconnect out-of-school youth (OSY) to education and jobs. As required by WIOA, the VDOL will expend a minimum of 75 percent of the youth formula funds on serving OSY. Youth who are no longer in the public school system, and are seeking to enter the labor market may face extraordinary barriers. The VDOL works to design services that:

- Acknowledge the challenges and characteristics of inexperienced jobseekers;
- Gather and use information concerning the conditions of employment that affect youth and labor laws restricting their employment;
- Develop and maintain effective relationships with schools, colleges, and other training providers;
- Develop employment opportunities for youth with career potential; and
- Develop opportunities for OSY that result in Industry Recognized Credentials (IRCs) in high-demand industries.

The 14 required Youth program elements are provided in partnership with the Youth Program administrator, the VDOL, by State agencies, non-profit organizations, or for profit private entities. The specific partners that provide the program elements are listed below, in order of the program element that they provide. The provision of the program elements varies depending on the area of the State served and the particular needs of that area's Youth population.

- 1) tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to high school diploma (or its recognized equivalent) or to a recognized postsecondary credential;
- 2) alternative secondary school services, or dropout recovery services, as appropriate;

Community Action Partners (CAP)

Spectrum

JobCorps

YouthBuild

Adult Technical Education

For the second program element, the alternative secondary schools include those that are recognized and approved by the Vermont Agency of Education.

3) paid and unpaid work experiences with both an academic and an occupational component, including—

- i. summer employment opportunities and other employment opportunities throughout school year;
- ii. pre-apprenticeship programs;
- iii. internships and job shadowing; and
- iv. on-the-job training opportunities;

The VDOL Workforce Development Division provides the paid and unpaid work experience element in conjunction with the following partners:

employers, especially in regards to on-the-job training opportunities

non-profit organizations

Technical Career Centers for pre-apprenticeship programs, and

other partners that provide pre-apprenticeships

4) occupational skill training (priority given to training programs that lead to recognized postsecondary credentials aligned with in-demand industry sectors or occupations);

5) education offered at the same time, and in the same context as preparation activities and training for a specific occupation;

Adult Education

Technical Education Schools

YouthBuild

JobCorps

Post-secondary education institutions

Private training providers (e.g., Advanced Welding Institute)

6) leadership development opportunities (including community service; activities encouraging positive social and civic behaviors);

Social Movement Organizations (SMO)

7) supportive services;

8) adult mentoring;

The VDOL providers both paid and unpaid support services to participants, depending on what the individual youth needs in order to participate in employment and training.

Referral to partner agencies, including:

Adult Education

Division of Vocational Rehabilitation

Organizations throughout the State comprised of retired Vermonters who are interested in mentoring at-risk youth

Easter Seals

Youth Service Bureau

Parks Place

Social Movement Organizations (SMO)

Big Brother/Big Sister

Healthy Babies Initiative

Mothers Against Drunk Driving (MADD)

Students Against Destructive Decisions (SADD)

My Brother's Keeper

Outright Vermont

Mobius

9) follow-up services;

All core partner program case managers provide follow-up services in compliance with their program's authorizing statute.

10) comprehensive guidance and counseling (including drug and alcohol abuse counseling and referral);

Private counselors, esp. re VT's drug addiction issues; Recovery Centers; Mental health agencies

11) financial literacy education;

Your Money Your Goals

12) entrepreneurial skills training;

The Vermont Agency of Human Services' Department for Children and Families has sponsored training events and projects to deliver a version of the curriculum called "Your Money, Your Goals". This curriculum was developed by the Consumer Finance Protection Bureau, and has been implemented by several of Vermont DCF's offices, including the Office of Economic Opportunity, and Vermont's TANF administrator, called Reach Up. The Reach Up program is currently in piloting a project in four Vermont districts, where Post-Secondary Education (PSE) program participants are placed into financial coaching sessions with Community Action Partner (CAP) agencies.

There are several banks and credit unions that provide statewide financial literacy education and other entrepreneurial skills training (e.g., Vermont State Employees Credit Union (VSECU)).

The Vermont State Treasurer's Office, in partnership with the Vermont Bankers Association, has held an annual statewide financial literacy poster contest since 2008 called Be Money Wi\$e. The goal of the poster contest is to help students think about personal finance and provide them with a creative outlet to demonstrate their knowledge. The contest is open to Vermont students in 3rd through 12th grades.

Other financial literacy and entrepreneurial skills training programs are carried out by:

Spectrum

Capstone

Vermont Student Assistance Corporation (VSAC)

Small Business Bureau

13) services that provide labor market and employment information about in-demand industry or occupations in local area (career awareness, career counseling, and career exploration services); and

Career Resource Centers

VDOL's Economic and Labor Market Information Division

14) activities that help youth prepare for and transition to postsecondary education and training.

Vermont Student Assistance Corporation (VSAC)

Community Action Partner (CAP) agencies

Career Tech Centers

Adult Technical Education

3. Describe how the state will ensure that all 14 program elements described in WIOA section 129(c) (2) are made available and effectively implemented, including quality pre-apprenticeship programs under the work experience program element.*

* Sec. 102(b)(2)(D)(i)(I)

Providing Youth Program Elements The State of Vermont is a Single State Local Area. Under the WIA, the VDOL operated under a waiver that waived the requirement to competitively bid the ten required youth elements. The VDOL is able to partner with local community providers to ensure that all program elements are provided at no cost to the Youth Program. This allowed the VDOL to ensure that participants had access to the same or similar types of services throughout the State. Vermont's WIOA youth program fosters integrated systems, coordinated services, career pathways, and multiple forms of engagement with businesses to benefit all youth. These elements recognize that career and personal success is a result of lifelong learning and continued growth in skills and abilities. Every individual who is determined eligible as an in-school or out-of-school youth will be offered the services below. Based on the individual assessment, services will be determined and an individual service strategy implemented. The following are the Program Elements; • Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to a high school diploma or its recognized equivalent or postsecondary credential; • Alternative secondary school services or dropout recovery services; • Paid and unpaid work experiences that have academic and occupational education as a component, such as summer and non-seasonal employment, pre-apprenticeship programs, internships and job shadowing, and on-the-job training in the private for-profit or nonprofit sectors; • Occupational skills training, which includes priority consideration for training programs that lead to recognized postsecondary credentials in in-demand industries or occupations in the local area; • Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation; • Leadership development opportunities, including community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors; • Supportive services, such as linkages to community services, assistance with transportation, child and dependent care, assistance with housing, needs-related payments, assistance with educational testing, reasonable accommodations for youth with disabilities, referrals to health care, and assistance with uniforms or other appropriate work attire and tools; • Adult mentoring for at least 12 months; • Follow-up services for not less than 12 months after completing participation; • Comprehensive guidance and counseling, such as drug and alcohol abuse, as well as referrals to counseling, as appropriate; • Financial literacy education; • Entrepreneurial skills training; • Services providing labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and • Activities that help youth prepare for and transition to post-secondary education and training. There is no entity that can provide every required element of a youth program to all areas of the State. The VDOL, through partnerships across the State, is able to ensure that each program element is made available to all youth throughout the State. A VDOL case manager reviews the required program elements with each youth participant to determine the appropriate program services to provide. The case manager then works with local community providers to ensure that the services are available to the participant. This allows the VDOL to ensure that all program elements are offered to all youth participants across the State. These partnerships allow the VDOL to use funds in the youth program to focus on job training for youth participants. The VDOL spends youth funds to pay for work experiences, on-the-job training, tuition, and summer employment opportunities. This allows the participants to explore career pathways and to learn the soft skills necessary to succeed in the workplace.

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.

It is the practice of the VDOL Youth program to serve the most “at-risk” youth of Vermont through the provision of career and educational development services. The VDOL has a procedure for those individuals who do not meet the specified WIOA eligibility markers (including high school dropouts, homeless youth, youth in foster care, pregnant or parenting teens, etc.), but who Need Additional Assistance (NAA) to complete an educational program or to secure or hold employment.

An In-School Youth (ISY) aged 14-21, who meets the low-income marker, but who does not have a specified at-risk eligibility factor as determined under WIOA § 129(a)(1)(B), may be served as an at-risk youth, provided that they are determined to NAA to complete an educational program or to secure or hold employment. Not more than 5 % of the ISY newly enrolled in a given program year may be eligible based on the NAA criterion.

An Out-of-School Youth (OSY) aged 16-24, who does not have a specified at-risk eligibility factor as determined under WIOA § 129(a)(1)(C), may be served as an at-risk youth, provided that they are determined to NAA to complete an educational program or to secure or hold employment. In order for an OSY to qualify as NAA, the OSY must also be determined to be low income. If an OSY applicant is age 18 or older, and is determined to have a low-risk NAA, a referral to the Adult WIOA program for a training services eligibility determination will be considered.

NAA DEFINITION An individual who needs additional assistance to overcome barriers to completing an educational program or to securing or holding employment will qualify for WIOA services if they are determined eligible and their NAA is clearly documented in both their case notes and their Objective Assessment. The following list establishes the barriers, their definitions and the acceptable documentation to be provided in support of the existence of such a barrier.

BARRIER: Incarcerated parent/legal guardian

DEFINITION: Youth with a parent or legal guardian who is currently or has been incarcerated within the past 5 years

ACCEPTABLE DOCUMENTATION: Letter or other documentation from Department of Corrections or the court system; self-attestation

BARRIER: Youth who has experienced recent traumatic events, are victims of abuse, or reside in an abusive environment

DEFINITION: Youth who has experienced recent traumatic events, are victims of abuse, or have resided in an abusive environment within the past 5 years

ACCEPTABLE DOCUMENTATION: Letter or other form of documentation from: a social service agency, the legal system, a school official; self-attestation

BARRIER: Youth who has been referred to or is being treated by an agency for substance abuse or addiction issues

DEFINITION: Youth with a substance abuse problem or addiction issue, has been treated for such a problem within the past 5 years, or previously in treatment facility

ACCEPTABLE DOCUMENTATION: Letter or other form of a documentation from: a treatment facility, a school official, a court official, a doctor, or a social service agency. Signed statement from a parent or guardian; medical records, or self-attestation

BARRIER: History of mental illness

DEFINITION: Youth that has been diagnosed with cognitive, emotional, or behavioral illnesses

ACCEPTABLE DOCUMENTATION: School documentation, medical records, letter or other documentation from mental health professional

BARRIER: Harassment, Victimization and Bullying

DEFINITION: Youth who is or was a victim of verbal or physical harassment and/or bullying

ACCEPTABLE DOCUMENTATION: School documentation, medical records, court documents, or self-attestation

BARRIER: Youth who is emancipated or in the process of being emancipated

DEFINITION: Youth who is emancipated or in the process of being emancipated by the courts

ACCEPTABLE DOCUMENTATION: Court documents

BARRIER: A high school graduate or GED recipient who has not held a full-time regular job for more than 3 consecutive months, and lacks work readiness skills necessary to obtain and retain substantial employment

DEFINITION: Individual who has not been able to obtain and retain employment for more than 3 consecutive months

ACCEPTABLE DOCUMENTATION: Documentation from past employers; self-attestation

BARRIER: Involved in gang activity

DEFINITION: A gang is a group of three or more individuals who engage in criminal activity and identify themselves with a common name or sign

ACCEPTABLE DOCUMENTATION: Court documentation; juvenile justice system documentation; self-attestation

BARRIER: Youth who is residing with family members with substance abuse or addiction issues

DEFINITION: Youth who is currently residing with a family member that is enrolled in a treatment program or who was released within the past 12 months prior to enrollment

ACCEPTABLE DOCUMENTATION: Letter or other documentation from the treatment facility verifying participation and/or release information

5. Include the State definition, as defined in law, for not attending school and attending school as specified in WIOA Section 129(a)(1)(B)(i) and Section 129(a)(1)(C)(i). If State law does not define “not attending school” or “attending school,” indicate that is the case and provide the state policy for determining whether a youth is attending or not attending school.

School Definitions The State of Vermont does not have a universal definition for “alternative school.” Nor does the State have a universal definition of what it means to be “attending school” or “not attending school.” In Vermont, much of the public school planning and operation is directed at the local, municipal level. This results in a variety of “alternative schools” throughout the State without a single uniform definition. Additionally, Vermont requires compulsory school attendance until the age of 16. However, the Agency of Education maintains a directory of approved and recognized independent schools, approved tutorial and distance learning schools, pregnant and parenting programs and state operated facilities. The VDOL intends to use this directory as a tool in making the assessment of whether a youth participant is or is not attending school in the state. The core partners are working together to develop a common definition of “attending school” that will work for the workforce development system in order to ensure equal services for all Vermonters and to avoid the duplication of services.

6. If using the basic skills deficient definition contained in WIOA Section 3(5)(B), include the State definition which must further define how to determine if an individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual’s family, or in society. If not using the portion of the definition contained in WIOA Section 3(5)(B), indicate that is the case.

The State will utilize the federal WIOA definitions for “basic skills deficient.”

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 disbursement 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).)**

PUBLIC COMMENT PERIOD (DRAFT RESPONSE: The majority of the comments received regarding the State Plan were made by the SWDB itself. These comments constituted suggestions, all of which were ultimately incorporated into the State Plan. None of the comments received represented disagreement with the Plan)

ENTITY RESPONSIBLE FOR DISBURSAL OF GRANT FUNDS As a single-state workforce area, Vermont has followed the federal requirements for distribution of funds. In TEGL 14-15 (March 04, 2016) USDOL advised that it was “exercising its transition authority provided in WIOA sec.503 to delay the requirement that Single-Area States include a local plan with their initial four-year State Plan submission until DOL provides guidance to those specific States”. Therefore, the VDOL, which operates as the State Workforce Administrator for WIOA title I funds, has been designated by the Governor and the SWDB as the WIOA Title I fiscal agent responsible for the following duties:

- Receiving, transferring and drawing down of federal WIOA title I funds;
- Ensuring sustained fiscal integrity and accountability for expenditures of the funds;
- Responding to federal and state audit financial findings;
- Maintaining proper accounting records and adequate documentation; and
- Preparing required federal and state financial reports.

TYPE AND AVAILABILITY OF WIOA TITLE I YOUTH ACTIVITIES The required Youth program activities are provided by the Youth Program administrator, the VDOL, in partnership with State agencies, non-profit organizations, or for profit private entities. The specific partners that provide the program elements are listed elsewhere in this Unified State Plan. The provision of the program elements varies depending on the area of the State served and the particular needs of that area’s Youth population.

In regards to the crucial work experience requirement, which must constitute 20 % of the Youth fund expenditures, the VDOL Youth program provides a robust variety of summer employment opportunities (SEOs) for youth. While these SEOs are not an element unto themselves, they do help to meet the work experience requirement. Examples of successful SEOs are numerous. In one program, youth trainees participate in a variety of park and community projects in order to provide positive skill building opportunities. The maintenance and improvements of these community facilities benefit the region, as well and build on a synergistic relationship with the VDOL in engaging at-risk youth in meaningful job training opportunities. A YouthBuild program provides youth participants with classroom or individual instruction in academics or professional development, and placement in work based learning positions within the YouthBuild program, or with partner agencies or employers. YouthBuild students work toward completing a high school diploma later in the academic year. There is also an SEO program that provides an opportunity for out-of-school parenting and foster care youth to explore a variety of careers in the community, such as grounds and building maintenance, housekeeping, gardening, cooking, child care, and healthcare. The youth learn about the skills and preparation required to secure these positions. This program offers a daily workshop that integrates career and academic learning, and builds essential life skills such as budgeting, apartment maintenance, landlord-tenant relations, healthy nutrition, and food preparation. Participants gain work readiness skills, improve their self-knowledge, and develop personal short- and long-term career plans that include the concrete steps necessary to develop a career pathway.

4. A description of the roles and resource contributions of the one-stop partners.

The roles and resource contributions of Vermont's one-stop partners are outlined in the January 1, 2018 MOU between One-Stop Partners and the State Workforce Development Board.

5. The competitive process used to award the subgrants and contracts for title I activities.

The process used to award subgrants and contracts for Title I activities followed the State of Vermont, Agency of Administration's Bulletin No. 3.5 - Procurement and Contracting Procedures.

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.

Vermont offers Title I training opportunities to eligible participants in the Adult, Dislocated Worker, and Out-of-School Youth programs, using both training funds and contracts with employers to provide on-the-job training.

Because of its small population and rural nature, the Governor does not maintain a list of On-the-Job training providers. Rather, on-the-job training is generally approached as job development negotiated with an employer for eligible participants.

Vermont maintains an extensive Eligible Training Provider List located at <http://labor.vermont.gov/wordpress/wp-content/uploads/WIOA-Eligible-Training-Provider-List.pdf> to ensure consumer choice for occupational skills training is provided for all areas of the state. The state's career and technical education centers, technical and community colleges, non-profit and private schools, accredited institutions of higher education in Vermont, and Registered Apprenticeships regularly submit new programs to add to the list. VDOL's caseworkers are extremely familiar with the track record and value of their local training providers and help participants navigate the available training options by reviewing the local or market demand for the occupational skills, costs of training, and past participant success.

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.

The State Board appointed an ad hoc committee to review applications submitted under Title II in April 2017. The committee met once to learn about their responsibilities and understand how adult education is currently funded and delivered in Vermont. The Vermont Agency of Education worked with the State Board liaison create an RFP, receive applications, and develop a scoring tool. The ad hoc committee reviewed and scored applications in May, meeting another time to discuss results and select winning applications.

The State Board selected a One-Stop Operator, the Vermont Department of Labor, to take on the role of coordinating and aligning core and one-stop programs. VDOL began its role as One-Stop Operator on July 1, 2017.

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.

Copies of the One-Stop MOU, including the Infrastructure Funding Agreement, and the One-Stop Operator MOU are available for review.

e. Waiver Requests (optional)

States wanting to request waivers as part of their title I-B Operational Plan must include a waiver plan that includes the following information for each waiver requested:

- 1. Identifies the statutory or regulatory requirements for which a waiver is requested and the goals that the State or local area, as appropriate, intends to achieve as a result of the waiver and how those goals relate to the Unified or Combined State Plan;**
- 2. Describes the actions that the State or local area, as appropriate, has undertaken to remove State or local statutory or regulatory barriers;**
- 3. Describes the goals of the waiver and the expected programmatic outcomes if the request is granted;**
- 4. Describes how the waiver will align with the Department's policy priorities, such as:**
 - A. supporting employer engagement;**
 - B. connecting education and training strategies;**
 - C. supporting work-based learning;**
 - D. improving job and career results, and**
 - E. other guidance issued by the Department.**
- 5. Describes the individuals affected by the waiver, including how the waiver will impact services for disadvantaged populations or individuals with multiple barriers to employment; and**
- 6. Describes the processes used to:**
 - A. Monitor the progress in implementing the waiver;**
 - B. Provide notice to any local board affected by the waiver;**
 - C. Provide any local board affected by the waiver an opportunity to comment on the request;**
 - D. Ensure meaningful public comment, including comment by business and organized labor, on the waiver.**
 - E. Collect and report information about waiver outcomes in the State's WIOA Annual Report**

7. The Secretary may require that States provide the most recent data available about the outcomes of the existing waiver in cases where the State seeks renewal of a previously approved waiver;

The USDOL recently advised that they may consider waiver requests under WIOA 2014, and as such, the partners in this Unified Plan may be requesting requesting waivers relating to their specific programs.

Title I-B Assurances

The State Plan must include assurances that:

1. The State has implemented a policy to ensure Adult program funds provide a priority in the delivery of training services and individualized career services to individuals who are low income, public assistance recipients and basic skills deficient; Yes
2. The State has implemented a policy to ensure local areas have a process in place for referring veterans with significant barriers to employment to career services provided by the JVSG program's Disabled Veterans' Outreach Program (DVOP) specialist; Yes
3. The state established a written policy and procedure that set forth criteria to be used by chief elected officials for the appointment of local workforce investment board members. Yes
4. The State established written policy and procedures to ensure local workforce investment boards are certified by the governor every two years in accordance with WIOA section 107(c)(2). Yes
5. Where an alternative entity takes the place of a State Board, the State has written policy and procedures to ensure the alternative entity meets the definition under WIOA section 101(e) and the legal requirements for membership. Yes
6. The State established a written policy and procedure for how the individuals and entities represented on the State Workforce Development Board help to determine the methods and factors of distribution, and how the State consults with chief elected officials in local areas throughout the State in determining the distributions. Yes
7. The State will not use funds received under WIOA Title I to assist, promote, or deter union organizing in accordance with WIOA section 181(b)(7). Yes
8. The State distributes adult and youth funds received under WIOA equitably throughout the State, and no local area suffers significant shifts in funding from year-to-year during the period covered by this plan. Yes
9. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I. Yes
10. The State agrees to report on the impact and outcomes of its approved waivers in its WIOA Annual Report. Yes
11. The State has taken appropriate action to secure compliance with the Uniform Guidance at 2 CFR 200 and 2 CFR 2900, including that the State will annually monitor local areas to ensure compliance and otherwise take appropriate action to secure compliance with the Uniform Guidance under section WIOA 184(a)(3); Yes

Program-Specific Requirements for Wagner-Peyser Program (Employment Services)

All program-specific requirements provided for the WIOA core programs in this section must be addressed for either a Unified or Combined State Plan.

a. Employment Service Professional Staff Development.

1. Describe how the State will utilize professional development activities for Employment Service staff to ensure staff is able to provide high quality services to both jobseekers and employers.

Vermont is in a unique position to implement the WIOA provisions relating to the Wagner-Peyser Act employment services because in Vermont the employment services are administered by the VDOL, the same department responsible for implementation of most other workforce development system partners, including the adult, dislocated worker, and youth programs. The VDOL uses the Wagner-Peyser Act employment services as the foundation on which its other workforce development programs are built upon. The labor market information provided by the employment services allows all individuals who come into contact with the workforce development system to have access to the Wagner-Peyser services. There is no need to move to a collocation of Wagner-Peyser and other workforce development partners because the WP employment services are already in house. The VDOL has developed written policies and procedures for training in employment services available through the Career Resource Centers. Wagner Peyser employment service training is essential to all VDOL staff working in the Career Resource Centers located throughout the State. The Workforce Development Division is dedicated to having a skilled and well trained workforce. All VDOL workforce development staff receive training on Wagner-Peyser employment services as part of their orientation as a new employee. Additional statewide training for all staff is scheduled on at least an annual basis, but more often when training needs are identified or there are changes to policies and procedures. With regard to training, the state noted that a broad range of topics will be covered. Experienced and trained VDOL staff members from each regional office will assist their co-workers in their respective centers and provide additional technical assistance and training in Wagner Peyser employment service activities. Core partners will participate in cross training as described in the Operational Planning section of this State Plan.

2. Describe strategies developed to support training and awareness across core programs and the Unemployment Insurance (UI) program, and the training provided for Employment Services and WIOA staff on identification of UI eligibility issues and referral to UI staff for adjudication.

The Vermont unemployment compensation programs are run by the VDOL. This allows the career resource centers easy access to the Vermont unemployment compensation system. Any individual who needs to gather information or access to Vermont unemployment compensation can do so through any Vermont career resource center. While there is no unemployment insurance staff physically located within any career resource center, the VDOL operates a claim center which allows for real-time virtual collocation. The career resource center staff has the ability to immediately access an unemployment compensation staff member to assist an individual in filing a UI claim. Career resource center staff are continuously trained on the UI claims process and given

information on the state UI programs in order to ensure that our staff is able to assist individuals in filing UI claims through the career resource centers.

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.

As for providing unemployment insurance claimants with workforce information, every individual who files for unemployment compensation must register with Vermont Job Link, the VDOL management information system. Vermont Job Link provides labor market information and whether they qualify for any of the workforce development training programs. Additionally, a user can set up his or her job link account to provide weekly information on job availability. In using this tool, when an individual files his or her weekly unemployment compensation claim an informational page interacts with the screen showing the locations of any VDOL workforce event, such as a hiring event, job fair, or special training session. This can also be used to access information on VDOL's workforce development programs, such as WIOA adult and dislocated worker programs. VDOL staff are available at all twelve job centers to assist claimants with getting started.

c. Describe the state's strategy for providing reemployment assistance to Unemployment Insurance claimants and other unemployed individuals.

The reemployment of Unemployment Insurance claimants and the reduction of erroneous unemployment insurance payments continue to be top priorities for the Vermont Department of Labor. In 2010, the Vermont General Assembly mandated that the Vermont Department of Labor prioritize services to unemployment claimants by enacting into law that "the department of labor shall implement reemployment services in district offices. The department shall implement a policy that prioritizes claimant for services in the regional offices." VDOL has completed its transition from the traditional REA/RESEA program design to the new RESEA program. This new program design has been fully implemented in all twelve career resource centers in the State. The Vermont RESEA program builds on the close working relationship between the VDOL Unemployment Insurance Division and its Workforce Development Division. The RESEA program connects UI claimants, at the outset of their unemployment, with reemployment and training services by specifically linking them to services through Vermont's career resource centers with a focus on claimant reemployment. This core program design has been shown to increase participant's competitive advantage by returning claimants to work for up to an average of at least two weeks earlier, thereby reducing the average duration of their claim.

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;

Specifically, the RESEA program is based on the following main elements: the close working relationship between the VDOL Divisions; the selection of participants within the fifth week of filing, once deemed monetarily eligible; service to the priority population; identification of needs through in-person eligibility reviews at the career resource center locations; the requirement for claimants to register in the Vermont Job Link system; and consecutive interface with claimants through in-person follow up activities.

2. Registration of UI claimants with the State's employment service if required by State law;

Vermont law (21 V.S.A. chapter 17) allows the Commissioner of Labor to require that individuals receiving unemployment compensation benefits also register with the State's employment services. Under this authority the VDOL does require that individuals who receive unemployment compensation benefits register within the Vermont Job Link system.

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

The program is designed to ensure that claimants have access to the full array of services available at the career resource centers while also ensure claimants comply with all the UI eligibility requirements. All RESEA services are provided by UI RESEA Career Development Facilitators as well as appropriately trained career resource center staff. The workforce development staff provides each RESEA claimant with a full array of reemployment services, labor market information, and completes a comprehensive assessment of needs and/or work action plan. The UI staff provides program management as well as conducts continuous eligibility review, work search verification and ongoing case management activities. In using Wagner-Peyser employment service funds the VDOL provides the following services through the career resource centers:

- Job assessment, referrals, and development;
- Skills assessment;
- Workforce development workshops, including interview and resume building workshops;
- Business outreach;
- Hiring events and job fairs;
- Labor market information; and
- Core and intensive services to individuals.

4. Provision of referrals to and application assistance for training and education programs and resources.

As mentioned above, the Wagner-Peyser employment services programs are the foundation of the Vermont career resource centers. When an individual accesses any career resource center he or she will first interact with a Wagner-Peyser staff. The Wagner-Peyser staff will do an initial needs assessment with the individual to determine his or her immediate needs. Based on this needs assessment, the individual can be referred to other workforce education and training programs, regardless of whether they

are physically or virtually collocated within the career resource center. As mentioned in this state plan, the one-stop partners are working together to develop a universal referral process in order to facilitate program referrals and avoid duplication of services.

e. Agricultural Outreach Plan (AOP). Each State agency must develop an AOP every four years as part of the Unified or Combined State Plan required under sections 102 or 103 of WIOA. The AOP must include--

1. Assessment of Need

Provide an assessment of the unique needs of farmworkers in the area based on past and projected agricultural and farmworker activity in the State. Such needs may include but are not limited to: employment, training, and housing.

Agriculture has long been an important part of Vermont's economy. The industry has a tremendous direct and indirect economic impact on the State. Some of Vermont's top commodities are: dairy, maple syrup, apples, assorted field crops, and strawberries. Heavy activity months are from March through October. The majority of agricultural activity continues to be from small family farm producers. Given this nature of the agricultural business in the State, there will not be a population of migrant workers traveling to harvest Vermont crops in this program year. The workers will come from the local communities and return to their permanent residence in the same day. This virtually eliminates the on-site housing needs for Vermont farmworkers, although if a referral is required, it will be made to Pathstone, the NFJP 167 grantee, for housing assistance.

There is a growing trend towards business diversity for the producers in Vermont. This trend has caused confusion amongst agricultural employers with respect to the basic labor laws, Fair Labor Standards Act (FLSA), particularly in the use of the definition and overtime exemption for agricultural workers. Along with the increase in diversity comes the complication for agricultural employers of meeting the requirements of the FLSA, and thereby increases the chances that agricultural employment will be investigated by USDOL Wage & Hour.

The VDOL has worked with the Vermont Agency of Agriculture, Food and Markets (AAFM) and the private sector to provide informational presentations on labor laws for agricultural employers. The partnership with the AAFM and offering employer information sessions has provided the opportunity to identify additional agricultural employers and to explain the services available for employers.

The VDOL and the AAFM plan to offer more agricultural employer information sessions throughout the year to assist employers in adapting to the changing market while complying with the labor regulations. An additional topic of concern for agricultural employers is when younger workers and college students enter the agriculture workforce, and how the agricultural employers are expected to navigate the regulations regarding internships.

The continued efforts to create and strengthen relationships between VDOL and other State agencies, non-profit and private organizations such as the Northeast Organization Farming Association of Vermont (NOFA), Ben and Jerry's, the Consulate General of Mexico, Migrant Justice, Migrant Education, and the Vermont Farm Health Coalition, will continue to develop a more complete and comprehensive outreach plan into both the employer and farmworker populations in Vermont. These relationships will provide the basis for reaching out to farmworkers to assess and address their employment, training, and housing needs.

A. An assessment of the agricultural activity in the State means: 1) identifying the top five labor-intensive crops, the months of heavy activity, and the geographic area of prime activity; 2) Summarize the agricultural employers' needs in the State (i.e. are they predominantly hiring local or foreign workers, are they expressing that there is a scarcity in the agricultural workforce); and 3) Identifying any economic, natural, or other factors that are affecting agriculture in the State or any projected factors that will affect agriculture in the State.

Agricultural activity in the State has not changed significantly from the previous years. Most of the seasonal farm work in the State is in the area of vegetables, strawberries, raspberries, blueberries, and apples. As most farms in Vermont are of a small, family run farm, there is not an increasing need for MSFW. Most of the labor is family or local labor that can return to their homes at the end of the day. With the lack of MSFW activity, larger farms find it difficult to fill their needs and turn to the H-2A Visa Program. Productivity has varied depending on the weather.

B. An assessment of the unique needs of farmworkers means summarizing Migrant and Seasonal Farm Worker (MSFW) characteristics (including if they are predominantly from certain countries, what language(s) they speak, the approximate number of MSFWs in the State during peak season and during low season, and whether they tend to be migrant, seasonal, or year-round farmworkers). This information must take into account data supplied by WIOA Section 167 National Farmworker Jobs Program (NFJP) grantees, other MSFW organizations, employer organizations, and State and/or Federal agency data sources such as the U.S. Department of Agriculture and the U.S. Department of Labor (DOL) Employment and Training Administration.

A review of the previous year's Migrant Seasonal Farm Worker (MSFW) activity in the State indicates the MSFW activity in Vermont is extremely low. At the end of the 4th quarter of PY2016, 14 of the approximately 31,000 registrants in the Vermont Joblink (VJL) MIS system identified themselves as MSFWs. Vermont also saw approximately 10 MSFW's from Puerto Rico responding to H-2A job orders. The majority of identified crop workers (about 500) in the state are through the H-2A program and as so, are not included in the MSFW count. The number of domestic MSFWs in Vermont is difficult to estimate and could be understated as some of these workers cannot be located or may be incorrectly self-reported in the Vermont MIS Vermont Joblink. Some of the workers may meet the guidelines of seasonal farm workers, the number of which is anticipated to be approximately 100 or less. This takes into account information from PathStone, the National Farmworkers Jobs Program (NFJP), Workforce Innovation and Opportunity Act (WIOA) section 167 grantee.

In order to conduct more effective outreach to Vermont farmworkers, and identify their employment, training, and supportive service needs, the VDOL will strengthen its existing partnerships with other State agencies, non-profit and private organizations such as the Northeast Organization Farming Association of Vermont (NOFA), Ben and Jerry's, the Consulate General of Mexico, Migrant Justice, Migrant Education, and the Vermont Farm Health Coalition.

The number of H-2A workers is expected to continue to increase. It is anticipated that approximately 70 job orders will be placed to hire approximately 500 to 550 workers to work primarily with the crop activity in vegetables, strawberries, raspberries, blueberries, and apples.

2. Outreach Activities

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

A. Contacting farmworkers who are not being reached by the normal intake activities conducted by the employment service offices.

The Vermont Department of Labor (VDOL) will conduct outreach services to the agricultural workers mainly through the State Monitor Advocate (SMA). The SMA will continue to unify and coordinate the federally required labor exchange activities of the MSFW Outreach Program, the Foreign Labor Certification (FLC) Program and the SMA system requirements. Coordination of these MSFW-centered programs will allow the VDOL to increase productivity of Wagner-Peyser funded activities and to more accurately evaluate and report services provided to agricultural workers and employers.

OUTREACH STRATEGY Based on the WIOA definitions of MSFW, the VDOL anticipates an increase in the number of eligible MSFWs in Vermont, which would trigger a need for more frequent outreach activities. Going forward, the outreach activities will be conducted proportionate to the number of MSFWs identified statewide. The VDOL estimates that the number of days of outreach contact, including visits to working, living, and gathering areas, will range from 15-20. The number of days of outreach will be distributed appropriately according to the crop activity throughout the program year. For example, in October through December 2018, visits will most likely be concentrated on apple orchards that package apples.

A permanent, part-time State Monitor Advocate is assigned by the VDOL to perform the following:

MONITORING DUTIES: Conduct agency-wide and on-going review of statewide delivery of services and protections afforded to MSFWs. Coordinate efforts to assure that all VDOL American Job Center (AJC) offices are reviewed at least once a year. Consult with state and local offices to ensure accurate reporting of MSFW-related information. Review proposed state Employment Service (ES) directives, manuals and operating instructions relating to MSFWs. Participate in Federal monitoring reviews. Review and report on at least a quarterly basis, all agency statistical data through the LEARS reporting system and other MSFW-related data. Responsible for all MSFW program reporting to the Regional USDOL as required or requested. Prepare an annual summary report of statewide services to MSFWs for the State Workforce Agency (SWA).

ADVOCACY DUTIES: Oversee the operation and performance of the ES Complaint system. Review the state agency's MSFW Outreach plan. Review the outreach workers monthly outreach summaries. Serve as an advocate to improve services to MSFWs within the ES.

FIELD DUTIES: Conduct frequent field visits to the working and living areas of MSFWs to verify ES were provided. Meet and work with community-based organizations and other employment-related agencies to coordinate other services to MSFWs. Raise issues as appropriate to ensure that the development of new systems/strategies for service delivery include meeting the needs of MSFW customers.

The monitoring reviews which are performed by the SMA take place in the VDOL AJCs and are further assurance that local systems are in compliance with the equity indicators and minimum service levels for MSFWs.

B. Providing technical assistance to outreach workers. Technical assistance must include trainings, conferences, additional resources, and increased collaboration with other organizations on topics such as one-stop center services (i.e. availability of referrals to training, supportive services, and career services, as well as specific employment opportunities), the employment service complaint system, information on the other organizations serving MSFWs in the area, and a basic summary of farmworker rights, including their rights with respect to the terms and conditions of employment.

Vermont is currently not classified as a significant MSFW state and has its SMA conduct all outreach activities and efforts. The SMA has attended various training conferences to stay up to date on best practices, and to disseminate information on services available through the One-Stop Career Centers, the complaint system, and information on the entities serving MSFWs in Vermont. The SMA also provides information on farmworker rights. Training has been and will continue to be provided to all VDOL Career Resource Center staff through the State by the SMA. The most recent statewide training sessions were carried out on August 26, 2016 and September 1, 2016. The training targets both new staff orientation and regular updates. Staff training is recorded and will be available to staff statewide. VDOL will also work with partner organizations to inform them of MSFWs in the area and programs and services provided.

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.

Outreach Workers will be trained on core programs along with specialty trainings designed to help them in their specific jobs. Training will be provided in the areas of resume development, customer service, sales, and career development facilitator. The current outreach worker is already knowledgeable in the appropriate circumstances for referral of an MSFW to unemployment insurance. Training will be provided to any potential new outreach workers as necessary to assist outreach workers in assessing when an MSFW ought to be referred to unemployment insurance for assistance and an eligibility determination.

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.

Professional development opportunities are available for VDOL outreach staff such as resume writing certification, career development facilitator certification and other training options.

E. Coordinating outreach efforts with NFJP grantees as well as with public and private community service agencies and MSFW groups.

The VDOL is working with the NFJP grantee, Pathstone, on developing an MOU to address the coordination of outreach efforts in the designated regions. The VDOL SMA will coordinate visits with Pathstone to locations across the state. VDOL partners with other agencies across the state of Vermont that also target the MSFW population, such organizations include National Farmworker Jobs Program (NFJP) 167 Grantee - Pathstone Corporation, Vermont Agency of Agriculture, Migrant Justice, Ben and Jerry's and the University of Vermont Extension Service Migrant Education Program.

In addition, staff will continue to foster cooperation with other governmental and community-based organizations in providing information and promoting the MSFW program at appropriate meetings and through other avenues. The SMA is also a member of the Vermont Farm Health Taskforce, the mission of which is to promote and sustain a healthy, stable farm work force statewide. The Taskforce utilizes a "common ground" approach that focuses on the commonalities and shared health and safety needs of all

farmers, farm workers and farm families living and working on Vermont farms. This membership in the Taskforce is a key forum for engaging with other partnership organizations.

The farm workers will be contacted at their living, gathering or other assembly areas by outreach workers. An explanation of workforce services available to MSFWs, including the availability of referrals to agricultural and nonagricultural employment, training, and supportive services, and other job development services will be provided in a language readily understood by them.

Each outreach worker will maintain a log of daily contacts which will include the number of MSFWs contacted and details of assistance provided. The name of the individual contacted will be recorded in all cases where an application for work is taken, a referral to a job is made, and/or a complaint is filed. Detailed reports relative to the number of MSFWs, their office of registration, and services provided can be retrieved through the reporting section of VJL after an account is established for the worker.

Outreach workers will be familiar with working and living conditions of the migrant and seasonal farm workers. If they observe, have reason to believe, or are in receipt of information regarding an apparent violation of employment related laws or employment service regulations by an employer, the outreach worker shall document the apparent violation and provide the information to the corresponding VDOL Regional Manager. They will provide assistance in the preparation of job service and non-job service complaints. Complaints will be recorded using the Employment Services (ES) Complaint Log and resolved using the ES Complaint System.

3. Services provided to farmworkers and agricultural employers through the one-stop delivery system.

Describe the State agency's proposed strategies for:

A. Providing the full range of employment and training services to the agricultural community, both farmworkers and agricultural employers, through the one-stop delivery system. This includes:

- i. How career and training services required under WIOA Title I will be provided to MSFWs through the one-stop centers;**
- ii. How the State serves agricultural employers and how it intends to improve such services.**

Outreach workers will inform MSFWs of and refer them to verified employment opportunities and the Employment Services Complaint System. Outreach workers will encourage the MSFWs to utilize the VDOL Career Resource Centers to obtain the full range of employment services; however, on-site assistance will also be offered in the preparation of applications, on a limited basis.

Outreach workers will refer individual MSFWs, or family members, who may be eligible, to WIOA and supportive services VDOL Career Resource Centers or other appropriate agencies. Further, the outreach workers will make follow-up contacts as necessary and appropriate to provide, to the maximum extent possible, the foregoing described services. MSFWs also will be shown how to use VJL, an Internet-based workforce data management and service delivery system. Through VJL, MSFWs can establish a Wagner — Peyser application and apply for jobs.

In the event that lack of English language skills is identified as a barrier to services, and/or training, translation services will be offered in the VDOL AJCs. Pathstone is also a partner of the VDOL Career Resource Centers and provides additional services to migrants and seasonal farm workers. In the coming program year, efforts will be initiated to establish closer cooperation and service collaboration with partners, such as the state's WIOA Section 167 NFJP grantee, to ensure greater alignment of intensive and training services to MSFWs.

Extensive outreach to agricultural employers is an on-going process. This is critical to maintaining interpersonal contact with the employers.

Examples of services provided to agricultural employers by VDOL staff include:

Local, regional and national recruitment assistance
 Screening job applicants
 Connection and coordination of services with government and community agencies
 Technical assistance with foreign labor certification
 Soliciting and filling job orders
 Disseminating information on farm-related rules and regulations
 Conducting prevailing wage and prevailing practice surveys
 Providing Pre-Occupancy inspections of migrant housing as required for H-2A applications
 Referring complaints to proper enforcement agencies
 Assisting employers in obtaining work-related posters and notices
 Participating in agricultural related meetings and notifying farmers of these meetings

Many contacts with agricultural employers are made as a result of referrals from other agencies such as the Vermont Agency of Agriculture or other Farm Associations, as well as by word-of-mouth from other workers or farmers. Continued efforts will be made in the upcoming year to increase the market penetration of agricultural employers.

The most basic service provided to agricultural employers is the filling of job openings. Job orders from agricultural employers are entered in VJL and qualified candidates are referred. All H-2A order users are mandated to take all qualified United States referrals through the workforce system. In addition, training is being provided to VDOL Career Resource Center staff throughout the state to encourage local domestic U.S. workers to apply for H-2A jobs.

Other services include housing inspections of H-2A camps. The SMA will also perform field checks and communicate with the Chicago National Processing Center in addressing matters relative to any H-2A deficiencies.

The Employment Services staff will strive to meet and exceed federal program requirements with respect to equity and minimum service level indicators of compliance.

B. Marketing the employment service complaint system to farmworkers and other farmworker advocacy groups.

The VDOL will educate farmworkers about the complaint system through in-person visits to farms by staff, and by posting a poster on-site that informs readers of the complaint system. The VDOL published a Vermont farmworker wage, hour, and housing factsheet in collaboration with several partner organizations (available on the VDOL's website in both English and Spanish: <http://labor.vermont.gov/wordpress/wp-content/uploads/Vermont-Farm-Labor-Wage-and-Hour-and-Housing-Fact-Sheet.pdf>).

C. Marketing the Agricultural Recruitment System to agricultural employers and how it intends to improve such publicity.

Services available to farmers and farmworkers are available online at www.labor.vermont.gov and the Vermont Job Link website at www.vermontjoblink.com. These websites include useful phone numbers and services provided to both farmworkers and agricultural employers.

The VDOL recognizes the importance of the agricultural industry in the State of Vermont and has devoted resources to meet the labor needs of agricultural employers and MSFWs. Funding for AJC agricultural services comes from Wagner-Peyser (W-P) and the Foreign Labor Certification (FLC) grant. The funds provided by USDOL to the VDOL support the workforce development services and activities including the processing of Agricultural and Food Processing Clearance Orders (Agricultural Recruitment System), H-2A-related job orders, conducting housing inspections, agricultural Prevailing Wage and Prevailing, Normal and Common Practice surveys, collecting agricultural crop and labor information, carrying out outreach activities, field checks, field visits, and processing complaints.

A number of employment-related services for job seekers and businesses are available at the Vermont One-Stop Career Centers.

Services for job seekers include:

- Job search assistance and access to online job listings
- Career counseling
- Coaching on job search skills
- Workshops on a variety of job search strategies
- Access to resources including computers, reference materials, resume building software, and economic data
- Networking groups
- Unemployment insurance walk-in services

Services for agricultural employers include:

- Access to qualified applicants
- Applicant pre-screening
- Posting of jobs
- Assistance with small and large-scale recruitment activities
- Help planning job fairs
- Testing and assessment of job candidates
- Targeted mailings
- Labor market information
- Information on training grants and tax credits

4. Other Requirements

A. Collaboration

Describe any collaborative agreements the state workforce agency (SWA) has with other MSFW service providers including NFJP grantees and other service providers. Describe how the SWA intends to build upon/increase collaboration with existing partners and in establishing new partners over the next four years (including any approximate timelines for establishing agreements or building upon existing agreements).

The VDOL does not have any formal agreements with providers. However, the VDOL does collaborate with Migrant Justice, Migrant Education, and are currently renewing an MOU with Pathstone to address the coordination of outreach efforts in the designated regions. The VDOL SMA will coordinate visits with Pathstone to locations across the state. VDOL partners with other agencies across the state of Vermont that also target the MSFW population, such organizations include National Farmworker Jobs Program (NFJP) 167 Grantee - Pathstone Corporation, Vermont Agency of Agriculture, Migrant Justice, Ben and Jerry's and the University of Vermont Extension Service Migrant Education Program.

In addition, staff will continue to foster cooperation with other governmental and community based organizations in providing information and promoting the MSFW program at appropriate meetings and through other avenues. The SMA is also a member of the Vermont Farm Health Taskforce, the mission of which is to promote and sustain a healthy, stable farm work force statewide. The Taskforce utilizes a "common ground" approach that focuses on the commonalities and shared health and safety needs of all farmers, farm workers and farm families living and working on Vermont farms. This membership in the Taskforce is a key forum for engaging with other partnership organizations.

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.

NFJP grantees, other appropriate MSFW groups, public agencies, agricultural employer organization, and other interested employer organizations were given 30 days to review and comment on the AOP. Comments were solicited from the following organizations:

Pathstone Corporation Migrant Education Migrant Justice Vermont Tree Fruit Growers Association Northeast Organic Farmers Association (NOFA) State Representative Alyson Eastman from Book-Ends Associates Vermont Agency of Agriculture

This statement will be updated to reflect comments received, and responses to those comments.

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.

Statewide assessments have shown an opportunity to increase services directly provided to migrants. The state has had some success in referrals to employment, referrals to supportive services and MSFWs placed in jobs. Referrals for career guidance, job development, and to staff assisted services and placement in non-agricultural jobs is an area that could be improved through quarterly monitoring of performance. If individuals identify themselves as MSFWs during the online registration process on Vermont Job Link, their profiles will be flagged for follow up so that they may be notified of services available in the AJCs.

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.

Vermont has no significant offices and very few workers who meet the definition for MSFWs, which has limited the potential capacity for outreach in the past. The VDOL SMA has continued to build working relationships statewide with entities to help serve migrant workers. The state will continue to seek effective ways of serving MSFWs and will enhance and increase its outreach efforts.

E. State Monitor Advocate

The plan must contain a statement confirming the State Monitor Advocate has reviewed and approved the AOP.

In accordance with 20 CFR § 653.108(g)(4), the State Monitor Advocate has reviewed and approved the Agricultural Outreach Plan included in Vermont's Unified State plan.

Wagner-Peyser Assurances

The State Plan must include assurances that:

1. The Wagner-Peyser Employment Service is co-located with one-stop centers or a plan and timeline has been developed to comply with this requirement within a reasonable amount of time. (sec 121(e)(3)); Yes
2. The State agency is complying with the requirements under 20 CFR 653.111 (State agency staffing requirements) if the State has significant MSFW one-stop centers; Yes
3. If a State Workforce Development Board, department, or agency administers State laws for vocational rehabilitation of persons with disabilities, that board, department, or agency cooperates with the agency that administers Wagner-Peyser services, Adult and Dislocated Worker programs and Youth Programs under Title I; and Yes
4. State agency merit-based public employees provide Wagner-Peyser Act-funded labor exchange activities in accordance with Department of Labor regulations. Yes

Program-Specific Requirements for Adult Education and Family Literacy Act Programs

p>The Unified or Combined State Plan must include a description of the following as it pertains to Adult Education and Literacy programs under title II, the Adult Education and Family Literacy Act (AEFLA).

a. Aligning of Content Standards

Describe how the eligible agency will, by July 1, 2016, align its content standards for adult education with State-adopted challenging academic content standards, as adopted under section 1111(b)(1) of the Elementary and Secondary Education Act of 1965, as amended (20 U.S.C. 6311(b)(1)).

The Vermont AOE has committed to the implementation of college and career readiness standards for all students. This means the adoption of the Common Core State Standards for its K–12 public schools, and the College and Career Readiness Standards for Adult Education (CCRS) . The CCRS is an exact subset of the Common Core State Standards that has been winnowed and validated for applicability to adult learners by expert panels commissioned at the national level. Both documents define three “key advances” or “instructional shifts” each for the broad content areas of English language arts/ literacy and mathematics for adults functioning from the most basic level through high school completion. English language arts/literacy standards specify skills in reading, writing, speaking and listening, language, and reading foundational skills.

By virtue of the origin of the CCRS in Common Core State Standards, the standards are aligned.

Implementation of these standards within AEL is an ongoing process of professional development and program improvement, led by the state office with local program engagement. In FY15, AEL providers engaged in five days of statewide training over the year to explore and understand the six instructional shifts. In FY16, AEL providers focused on the implementation of the English Language Arts/ Literacy standards via four more days of training and additional work, to support local processes of lesson and classroom materials review and revision, observation of teaching, and revamping assignments. This training and implementation process is otherwise known as “Standards in Action.” Standards—based teaching strategies were supported in FY15 through six days of statewide training and follow—up within a national training course called “Adult Numeracy Instruction Professional Development.” The Standards in Action protocols will be launched through statewide training for the mathematics standards.

b. Local Activities

Describe how the State will, using the considerations specified in section 231(e) of WIOA, fund each eligible provider to establish or operate programs that provide any of the following adult education and literacy activities identified in section 203 of WIOA, including programs that provide such activities concurrently. The Unified or Combined State Plan must include at a minimum the scope, content, and organization of these local activities.

Adult Education and Literacy Activities (Section 203 of WIOA)

- o Adult education;
- o Literacy;
- o Workplace adult education and literacy activities;
- o Family literacy activities;
- o English language acquisition activities;
- o Integrated English literacy and civics education;
- o Workforce preparation activities; or
- o Integrated education and training that—
 1. Provides adult education and literacy activities, concurrently and contextually with both, workforce preparation activities, and workforce training for a specific occupation or occupational cluster, and
 2. Is for the purpose of educational and career advancement.

The Vermont AOE will run competitions for its funds under WIOA Title II using the procedures established by the State of Vermont for awarding grants or contracts, and the guidance available in the final WIOA regulations. The funds will be awarded to eligible providers of services on a basis of three years for the purpose of establishing AEL and operating programs that provide some or all of the WIOA Title II activities as warranted by demographic data within the service area of one or more particular counties. In so doing, AEL programs will function as a required and valued partner in the regional One-Stop Center (also known in Vermont as local American Job Centers or Career Resource Centers), including functioning as a partner in the development of regionally-relevant career pathways that reflect employer engagement. Career pathways will have specific entrance points for lower skilled adults, but will also map out additional entrance and exit points (e.g., postsecondary education and job opportunities) for adult learners. A Memorandum of Understanding (MOU) signed between the operator of the One-Stop Centers and each of its required partners was signed in June of 2017. Adult education programs will adhere to the MOU established between the One-Stop Center operator (Vermont DOL) and the Vermont AOE.

Local activities may include some or all of the following:

- Adult Education and Literacy;
- workplace AEL activities;
- family literacy activities;
- English language acquisition (ESOL) activities;
- Integrated English literacy and civics education (IEL/CE), and/or civics education and engagement for all adult learners served;
- workforce preparation activities (to impart employability skills which are a combination of basic academic skills, critical thinking, digital literacy, and self-management skills); and
- integrated education and training that provides AEL activities concurrently and contextually with both workforce preparation activities and workforce training for a specific, regionally- relevant occupation or occupational cluster, and is for the purpose of educational and career advancement.

As required by WIOA Title I B, local AEL activities proposals are reviewed by the State Workforce Development Board (SWDB) for alignment to the State Plan using a procedure established by the State Workforce Development Board and the Vermont AOE. Because Vermont operates as a single service area in its Workforce Development Board structure, local proposals are reviewed by the SWDB for alignment. A sub-committee of the SWDB is trained by AOE staff on Title II requirements and activities to inform committee members' review of applications.

The Vermont AOE uses the 13 considerations for awarding grants or contracts as described in WIOA as pertinent to the proposed scope of work:

1. the degree to which the provider would be responsive to regional needs of the workforce and serving individuals most in need of AEL activities;
2. the ability of the provider to serve individuals with disabilities, including learning disabilities;
3. past effectiveness of the provider in improving literacy of individuals especially who have low levels of literacy, and past effectiveness in meeting established performance targets;
4. the extent of alignment between proposed services and the regional strategies and goals of the workforce development system, and alignment with the services of the other one-stop partners;
5. whether the provider's program is of sufficient intensity and quality, and based on the most rigorous research available so that participants achieve substantial learning gains, and uses instructional practices that include the essential components of reading instruction;
6. whether the provider's activities, including reading, writing, speaking, math and English language acquisition instruction are based on best practices based on most rigorous research available and appropriate;
7. whether the provider's activities effectively use technology, services, and delivery systems, possibly to include distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance;
8. whether the provider's activities provide learning in context, including through integrated education and training, so that an individual acquires the skills needed to transition to and complete postsecondary education and training programs, obtain and advance in employment leading to economic self-sufficiency, and to exercise the rights and responsibilities of citizenship;
9. whether the provider's activities are delivered by well-trained instructors and program staff who access high quality professional development opportunities, including via the Literacy Information and Communication System (LINCS);

10. whether the provider's activities, for the development of career pathways, coordinate with other available education, training, and social service resources in the community and other one-stop center partners;
11. whether the provider's activities offer flexible schedules and coordination with Federal, state, and local support services that are necessary to enable individuals to attend and complete programs;
12. whether the provider maintains student records in DataWorks which has the capacity to report measurable participant outcomes and to monitor program performance.
13. whether the local areas served by the provider have a demonstrated need for additional English language acquisition and civics education programs.

In addition, local activities will include:

- Systematic outreach and recruitment to target populations.
- Intake and enrollment procedures that welcome learners and establish a strong commitment, support, and clear expectations for each learner's AEL participation, making full use of education plans and enabling learners to make fully informed decisions regarding program options.
- Basic skills (ABE, ASE, and ESOL) instruction that is standards-based and:
 - provides sufficient intensity and duration for substantive skill building and engages learners in continuing participation;
 - uses varied instructional approaches in response to varied learning styles;
 - engages learners in ongoing assessment and documentation of their skill gains; and,
 - is provided by trained and qualified instructional staff.
- Student skill assessments and credentials through:
 - State approved standardized testing in reading, writing, mathematics, ESOL for baseline and post-assessment of skill levels;
 - formal and informal assessments used by teachers and learners during instruction for ongoing guidance and documentation of learning;
- Guidance, coaching, and support services that support student persistence and progress, including such support for postsecondary transitions.

The Vermont Agency of Education will ensure to the fullest extent possible equitable access to, participation in, and appropriate educational opportunities for all teachers and students with special needs, per Section 427 of the General Education Provisions Act. The AOE and local AEL providers do not discriminate on the basis of disability, age, race, creed, color, national origin, marital status, sex, sexual orientation, or gender identity of any person, or any other status or classification protected by federal, state or law in its education and outreach activities. It provides reasonable and appropriate accommodations in response to the needs of its students and teachers.

The AOE will take the following steps to ensure equitable access:

1. As part of Consideration 2 included in the grant application in 2017, eligible providers were asked to address this prompt: Describe the policies adopted by the applicant to accommodate students and staff with disabilities, including learning disabilities, as described in the American with Disabilities Act of 1990 (42 U.S.C. 12102), WIOA Section 3(25), and the General Education Provisions Act, Section 427.
2. An AEL proposal review panel consisted of seven AOE staff members, including a representative of the Special Education team. A scoring criteria table was completed by all reviewers and two reviewer meetings were held to discuss and document comments.
3. Feedback from the review panel was provided to each awardee before the development of grant agreements that specified conditions for the grant based on the risk assessment and the grant proposals.
4. As an element of technical assistance, the AOE required all local provider staff to attend 2-3 hours of implicit bias training provided by the Vermont Human Rights Commission in program year 2017. In addition, over 70% of AOE staff have participated in this training.
5. The AOE will monitor local AEL providers to ensure that:
 - A. Teachers are hired without discrimination based on gender, race, national origin, color, disability, or age;
 - B. Students have equitable access to assessments and program services without discrimination, in keeping with Federal and Vermont anti-discrimination laws.

Special Rule

Each eligible agency awarding a grant or contract under this section shall not use any funds made available under this title for adult education and literacy activities for the purpose of supporting or providing programs, services, or activities for individuals who are under the age of 16 and are enrolled or required to be enrolled in secondary school under State law, except that such agency may use such funds for such purpose if such programs, services, or activities are related to family literacy activities. In providing family literacy activities under this title, an eligible provider shall attempt to coordinate with programs and services that are not assisted under this title prior to using funds for adult education and literacy activities under this title for activities other than activities for eligible individuals.

c. Corrections Education and other Education of Institutionalized Individuals

Describe how the State will establish and operate programs under section 225 of WIOA for corrections education and education of other institutionalized individuals, including how it will fund, in accordance with the requirements of title II, subtitle C, any of the following academic programs for:

- Adult education and literacy activities;
- Special education, as determined by the eligible agency;
- Secondary school credit;

- Integrated education and training;
- Career pathways;
- Concurrent enrollment;
- Peer tutoring; and
- Transition to re-entry initiatives and other post release services with the goal of reducing recidivism.

Each eligible agency using funds provided under Programs for Corrections Education and Other Institutionalized Individuals to carry out a program for criminal offenders within a correctional institution must give priority to serving individuals who are likely to leave the correctional institution within 5 years of participation in the program.

If the State awards funds for Corrections Education, the State will ensure that no more than the 20% of the eligible funds awarded under WIOA statute will be allocated. Any funds allocated under section 225 will be tracked according to the budget submitted by the awarded local provider and approved by Vermont AOE. The local provider will be required to report on individuals served using funds under section 225 through the AEL database system. In addition, AOE report requirements will monitor all local providers' expenditures of AEFLA funds including those awarded for Corrections Education, if any.

Currently, it is not expected that the State will award funds under Title II for Corrections Education for the following reason: incarcerated individuals are enrolled in the Community High School of Vermont and do not meet the definition of eligible individuals under Title II. Eligible individual means an individual who is at least 16 years of age; is not enrolled in school or required to be enrolled in secondary school under State law; and who is basic skills deficient; does not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education; or is an English language learner.

The Community High School of Vermont is operated and regulated by the Vermont Department of Corrections (DOC). It is an independent school approved by the Vermont State Board of Education and operates in service of its learners at multiple sites around the state who are enrolled in the school. The Community High School serves all persons under the custody of the Commissioner of Corrections, including those who are incarcerated, on parole or on probation.

Referrals are routinely made to local AEL providers as learners transition from Community High School of Vermont (DOC) to the community. DOC staff, including probation officers and Community High School staff, refer formerly incarcerated persons no longer enrolled in Community High School to local AEL providers. At that point of engagement with the local AEL provider, the students are eligible individuals and will receive the range of services afforded any adult learner.

d. Integrated English Literacy and Civics Education Program

1. Describe how the State will establish and operate Integrated English Literacy and Civics Education programs under Section 243 of WIOA, for English language learners who are adults, including professionals with degrees and credentials in their native countries.

Integrated English Literacy and Civics Education (IEL/CE) is defined as "education services provided to English language learners who are adults, including professionals with degrees and credentials in their native countries, that enables such adults to achieve competency in the English language and acquire the basic and more advanced skills needed to function effectively as parents, workers, and citizens in the United States. Such services shall include instruction in literacy and English language acquisition and instruction on the rights and responsibilities of citizenship and civic participation, and may include workforce training."

IEL/CE funds are allocated to States by the federal government using a model that takes into account need for services that references adult English language learner demographics for a state and immigration patterns. It is anticipated that the Vermont AOE will receive the established minimum as it historically has, \$60,000 per year; this amount is distributed in one or more grants or contracts to provide IEL/CE services through an open competition for funding.

The Vermont AOE will request formal proposals from local service providers eligible for funding under WIOA Title II to provide the services of IEL/CE with a priority focus on serving communities with significant concentrations of adult English language learners, and operating in partnership with established programs so as to supplement and not supplant existing efforts while accomplishing the purpose of IEL/CE.

IEL/CE programs will be delivered in combination with integrated education and training (IET) activities. They will 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. They will collaborate with local employers, CTE centers, and/or others to develop and implement IET programs.

IEL/CE will not be provided in every county or community through this funding source. The RFP will be shaped by an in-state demographic data analysis, environmental scan of existing programs and funding sources outside of WIOA Title II, and ability to work with partners to accomplish the purposes of IEL/CE, as demonstrated in the funding competition.

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.

The Vermont AOE will comply with Subpart C by requesting formal proposals to provide IEL/CE services from eligible providers under WIOA Title II. As described above, eligible providers may submit proposals as part of a single grant application in response to the funding opportunity that will compete all Title II funds under sections 225, 231, and 243. The funding opportunity will be widely announced as an open competition for eligible providers as previously described.

No more than four awards will be made to serve AOE identified geographic regions with significant concentrations of adult English language learners. Vermont does not have a large population of English language learners, but has geographic concentrations of refugee resettlement. AOE will use demographics and data from the Vermont Refugee Resettlement Program, American FactFinder, census data, and other relevant sources in order to determine the geographic regions that are positioned to meet the intended goals as set forth in section 243 (c) IEL/CE funds. The grant application will specify the geographic regions to be served by IEL/CE funds.

In consideration of proposals for Integrated English Language and Civics Education funds, the Vermont AOE will apply the 13 considerations specified in section 231(e) and review whether the program makes use of highly trained instructors including those who hold degrees, credentials, or coursework in Teaching English to Speakers of Other Languages (TESOL).

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.

State Leadership activity requirements are well-defined in WIOA Title II Section 223. The funds are intended to be used to develop or enhance the adult education system in Vermont. The Vermont AOE will be responsible for using the modest funds allotted to carry out the required State Leadership activities as follows:

- Align AEL activities with other core partners and one-stop partners, to implement the strategy identified in the vision for the workforce development system in Vermont, as described in an earlier chapter within this Unified State Plan. Achieving this alignment requires communication and working in concert with our partners at the Vermont DOL and the Vermont DVR at the state level in light of our common strategic vision for the workforce development system. In particular, the workforce development system goal of “seamless coordination amongst the workforce development system partners” requires joint cross-training of One-Stop Center staff for common intake and joint referral processes, with the AEL contribution to this effort considered a State Leadership activity. This includes:
 - support for cross- core-program efforts on the development of career pathways that provide access to employment and training services for individuals in AEL activities;
 - support for promoting an understanding in the field of the development and use of Integrated Education and Training models in partnership with employers; and,
 - support for implementing evidence-based program models that facilitate learners’ successful transitions to post-secondary education.
- Provide and/or oversee high quality professional development programs designed to improve instruction, including:
 - the essential components of reading instruction through an evidence-based reading training such as Student Achievement in Reading (STAR) or similar;
 - instruction related to the specific needs of adult learners as determined by a needs assessment of the field; and
 - dissemination of information about promising practices related to such professional development programs.
- Provide technical assistance to AEL providers including:
 - dissemination of instructional and programmatic practices based on the most rigorous or scientifically valid research available and appropriate, in reading, writing, speaking, mathematics, English language acquisition programs (ESOL), distance education, and staff training;
 - support for the role of adult education providers as one-stop partners to provide access to employment, education, training, and postsecondary guidance services;
 - assistance in the use of technology, including for staff training, to adult education providers, especially the use of technology to improve system efficiencies.
- Monitor and evaluate the quality of and the improvement in AEL activities and disseminate information about models and proven or promising practices within Vermont and beyond.

2. Describe how the State will use the funds to carry out permissible State Leadership Activities under section 223 of WIOA, if applicable.

The Vermont AOE will be responsible to carry out permissible State Leadership activities as follows as funding permits:

- Maintaining active membership in the New England Literacy Resource Center, as well as active partnership in the Literacy Information and Communication System (LINCS) in order to foster collaboration amongst other agencies and minimize duplication of effort;
- Disseminating models and content for integrated education and training and career pathways, including those that address opportunities available directly after high school completion, requiring middle skills employment, and/or significant postsecondary educational and occupational training;
- The provision of assistance to AEL providers in meeting the State-adjusted levels of performance, commonly known as performance targets, via technical assistance, desk monitoring, ongoing communication, site visits and targeted professional development and program improvement activities; and,
- Continuing our work on standards implementation, including the use of aligned and approved assessments when available, so that students are prepared for college and careers as a result of their participation in AEL.

f. Assessing Quality

Describe how the eligible agency will assess the quality of providers of adult education and literacy activities under title II and take actions to improve such quality, including providing the activities described in section 223(a)(1)(B) of WIOA.

In partnership with adult education providers, the Vermont AOE will continue to collect data from its adult education providers pertaining to student demographics, outcomes, and program performance in a relational, web-based database. The Vermont AOE tracks and reports follow-up performance measures relating to employment and post-secondary entrance through a data sharing Memorandum of Understanding with the core partners. Of notable importance is increasing the number of low skilled students served in AEL activities in Vermont, and helping students achieve measurable skill gains particularly at the lower skill levels.

Historically, skill gains for adult education students with skills at the secondary school level in Vermont have compared favorably to those in other states. In contrast, skill gains for students at the lower skill levels have not been favorable as compared to other states. Vermont is developing a State Longitudinal Data System (SLDS), which will eventually house the AEL database (DataWorks). Existing elements will be modified and/or added to as needed in order to meet the needs under WIOA and the Unified State Plan.

To be accountable for the public investment in the learners that we serve, to communicate our efforts more transparently, and to be able to acknowledge our strengths and successes, the Vermont AOE will establish a particular, simplified report. (The full range of other reports will continue to be available in real time to programs.) It will be made available in real time to adult education

providers, and local results will be posted semiannually to the VT AOE's website. In plain language it will show the number of students served, the distribution of levels and skill gains, results against the common performance indicators, and other basic information determined to be relevant to assessing quality. Based on this common public reference Vermont AOE will establish on-going and regular (quarterly) communication about program performance with adult education providers with achieving target levels of performance as a primary goal. The annual performance targets are anticipated to be set in a climate of realistic continuous program improvement. Program performance that is on target will be acknowledged and celebrated. Program performance that does not meet targets will receive the timely attention of the Vermont AOE. A program improvement plan will be established in collaboration with the local provider. Targeted technical assistance, further training and support in relation to these plans of improvement will be delivered to the program.

Professional development activities are planned in response to provider need and performance. Annual needs assessments inform the approach to offer opportunities that address identified gaps in knowledge and skills. Written evaluations collected from participants will be used to assess quality of workshops and trainings and to adjust subsequent professional development activities. The AEL (DataWorks) information management system is utilized to monitor changes in student outcomes and whether these changes are correlated with professional development activities. Evaluation tools will also include classroom observations and instructor anecdotes of experiences with integration of new strategies. Randomly selected participant interviews will measure retention of content, which will inform planning for future training.

Certifications

States must provide written and signed certifications that

1. The plan is submitted by the State agency that is eligible to submit the plan. Yes
2. The State agency has authority under State law to perform the functions of the State under the program. Yes
3. The State legally may carry out each provision of the plan. Yes
4. All provisions of the plan are consistent with State law. Yes
5. A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan. Yes
6. The State officer who is submitting the plan, specified by the title in the certification, has authority to submit the plan. Yes
7. The agency that is submitting the plan has adopted or otherwise formally approved the plan. Yes
8. The plan is the basis for State operation and administration of the program. Yes

Certification Regarding Lobbying

Certification for Contracts, Grants, Loans, and Cooperative Agreements

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that: If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization **Vermont Agency of Education**

Full Name of Authorized Representative: **Heather Bouchey**

Title of Authorized Representative: **Agency of Education Deputy Secretary**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)

(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to OCTAE_MAT@ed.gov

Assurances

The State Plan must include assurances that:

1. The eligible agency will expend funds appropriated to carry out title II of the Workforce Innovation and Opportunity Act (WIOA) only in a manner consistent with fiscal requirements under section 241(a) of WIOA (regarding supplement and not supplant provisions). Yes
2. The eligible agency will ensure that there is at least one eligible provider serving each local area, as defined in section 3(32) of WIOA. Yes
3. The eligible agency will not use any funds made available under title II of WIOA for the purpose of supporting or providing programs, services, or activities for individuals who are not "eligible individuals" within the meaning of section 203(4) of WIOA, unless it is providing programs, services or activities related to family literacy activities, as defined in section 203(9) of WIOA. Yes
4. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be delivered in combination with integrated education and training activities; Yes
5. The Integrated English Literacy and Civics Education program under section 243(a) of WIOA will be designed to (1) prepare adults who are English language learners for, and place such adults in, unsubsidized employment in in-demand industries and occupations that lead to economic self-sufficiency and (2) integrate with the local workforce development system and its functions to carry out the activities of the program; and Yes
6. Using funds made available under title II of WIOA to carry out a program for criminal offenders within a correctional institution, the eligible agency will give priority to serving individuals who are likely to leave the correctional institution within five years of participation in the program. Yes
7. The eligible agency agrees that in expending funds made available under title II of WIOA, the eligible agency will comply with sections 8301 through 8303 of the Buy American Act (41 U.S.C. 8301-8303). Yes

Section 427 of the General Education Provisions Act (GEPA)

In the text box below, describe the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs provide the information to meet the requirements of Section 427 of the General Education Provisions Act (GEPA), consistent with the instructions posted at <https://www2.ed.gov/fund/grant/apply/appforms/gepa427.doc>.

Program-Specific Requirements for Vocational Rehabilitation (General)

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

* Sec. 102(b)(D)(iii) of WIOA

a. Input of State Rehabilitation Council

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

(a) Input of State Rehabilitation Council. (1) Input provided by the State Rehabilitation Council; The State Rehabilitation Council (SRC) and DVR continue to enjoy a collaborative working relationship. SRC members are invited to participate on various DVR planning and implementation committees. The DVR Director provides quarterly written and oral updates on programs, activities, and outcomes. In addition, DVR Program Managers, Regional Managers and field staff frequently make presentations to the full SRC and gather feedback and suggestions to improve services. The following is a summary of the SRC's activities taken directly from the 2017 SRC annual report. For more information on the VT SRC and a copy of this report go to www.VTSRC.org SRC Steering Committee Report by Adam Leonard, SRC Chair The Vermont State Rehabilitation Council (SRC) Steering Committee is charged with the task of considering and deciding upon necessary SRC business between meetings of the full Council. The Committee set agendas for the full Council meetings taking into consideration topics most pertinent and timely to the operation of the SRC. The Steering Committee achieved its goal and guided the VT SRC to a very productive year. The largest issue that the affected VT DVR was the significant reduction in re-allotment funding DVR received. DVR's re-allotment funding was reduced 76% year over year leading to a multi-million-dollar budget shortfall in the 2016-2017 fiscal year. The Steering Committee was intimately involved in advocacy work around this issue, working with VT state legislators to propose long term financial solutions, as well as working closely with VT VR to understand the operational impact of this unexpected funding loss. Another major focus area for the SRC this year was to better understand the services VT DVR was providing to youth. This interest was sparked by the strong emphasis on youth services in WIOA. To that end the Steering Committee scheduled a youth themed SRC meeting in June with a panel of youth who had previously or were currently receiving services from DVR as well as a panel of staff members from DVR, VABIR and the schools who all work with youth. The panels were very successful and well received by the SRC. Additionally, many changes were made this year that were organizationally impactful to the SRC. First a decision was made to dissolve the Advocacy Outreach and Education Committee. The Steering Committee felt the work of the AOE Committee could be done on an as needed basis by specially selected SRC members as part of a subcommittee. Although this change was implemented there continues to be discussion by the SRC on whether the AOE Committee should be reinstated. Secondly, the decision was made to combine the October SRC meeting and the SRC Annual Retreat into one single event. The committee felt asking SRC members to commit to two meetings in one month was potentially burdensome. The committee planned this year's retreat to also include agenda items that would typically be covered in the full SRC meeting to combine the two events. Finally, it was proposed that to expand the size of the Steering Committee that Sam Liss and Adam Leonard should step down from their roles as chairs of the Policy and Procedures and Performance Review Committees respectively. As Chair and Vice Chair of the SRC as well as committee chairs they were filling multiple seats on the Steering Committee, thereby reducing the total number of members on the Steering Committee. These transitions occurred starting in June and Julia Burakian and Sherrie Brunelle stepped into the roles of Performance Review Chair and

Policy and Procedures Chair respectively. SRC Performance Review Committee Report by Adam Leonard, P&P Committee Chair The SRC Performance Review (PR) Committee is responsible for reviewing, analyzing and advising DVR on its performance in fulfilling its mission and responsibilities. This year the PR Committee focused much of its efforts on understanding VR's performance in relation to the new standards set forth in WIOA. This included examining the technical guidance received from RSA and its implications for VT VR. In February 2017 the PR committee heard from Alice Porter regarding the RSA Technical Assistance Circular (TAC) which provided clarification on how RSA would be calculating the Common Performance Measures. The committee learned that VT DVR submitted written comments to RSA and many of their suggestions and concerns were addressed in the TAC. VR was asked about goals for 2016-2017 now that guidance on measuring the indicators was in place. The committee learned that because this is a new way for DVR to measure outcomes that 2016-2017 will be a baseline year, and goals will be set for future years based on this year's results. Additionally, the committee examined the RSA guidance around what expenses can be considered Pre-employment Transition Services (Pre-ETS) expenses. We learned that the tracking required by RSA will be more cumbersome than hoped and requires counselors to delineate many of their duties between Pre-ETS and non-Pre-ETS work. However, we were glad to hear RSA and shared with VT DVR that the way in which they were tracking expenses was being done correctly. In alignment with our focus on WIOA and Pre-ETS impact the PR Committee asked for an overview of the youth survey and listening sessions conducted by the Vermont Family Network (VFN) for DVR. Martha Frank from VFN shared these results with us. One of the major takeaways from this valuable gathering of information was that VT VR still has a large opportunity to increase awareness about VR and the services VR offers to youth with disabilities and their families. The PR Committee also had the opportunity to see the results of one of its initiatives from last year, the Consumer Orientation. Samantha Brennan presented the new Consumer Orientation. The new program was designed in part because of the PR Committee's examination of the previous program from last year. The committee was excited to hear about the coming changes to the program. SRC Policy & Procedures Committee Report by Sam Liss, P&P Committee Chair FFY 2017 was another productive year for the SRC Policy and Procedures Committee. Four meetings were held between October and September 2017. One meeting was canceled. The focus of the committee's work this year was reviewing, revising, and approving changes in the manual chapters needed to comply with the Federal Workforce Innovation and Opportunity Act (WIOA) regulations that guide the work of the Division of Vocational Rehabilitation Services (DVR). The Committee also reviewed and revised other chapters upon recommendation of the SRC Client Assistance Program (CAP) representative and other P&P Committee members. In total, the Committee reviewed, revised and approved six (6) chapters for public comment. These chapters became final on July 1, 2017. Key changes included: • Emphasizing "competitive, integrated employment" for all consumers; • Including "advancement in employment" as an appropriate employment outcome; • Clarifying the requirement to develop and complete an Individual Plan for Employment (IPE) for an eligible consumer within 90-days; and • Defining clear procedures and timelines in the appeals process. The Committee began work on additional chapters. The first is a new chapter that will provide guidance to VR staff on the provision of Pre-Employment Transition Services (Pre-ETS) for youth, a new requirement under WIOA. The new chapter was published in December 2017. The second is the revision of the chapter providing guidance on VR funding of hearing aids. Work on this chapter will continue into FFY 2018. The committee agreed to review Chapter 310 related to supported employment to clarify the substance of the chapter. The committee also agreed to develop two (2) new chapters on Cost-Sharing and Denial of Benefits. The committee decided not to develop a Progressive Employment chapter. In addition to work on the Policy and Procedures Manual, the Committee discussed two possible changes to the SRC bylaws. One is related to the advocacy function of the SRC. It was deferred for further discussion and consideration. The other, proposed adding "a parent or another immediate family member of a person with a disability" to the requisite criterion for the position of Chair or Vice-Chair of the SRC. This proposed change conforms to parallel provisions in bylaws of similar councils/committees. This proposed change was approved by the committee and voted on by the full SRC at the October 2017 meeting.

2. the Designated State unit's response to the Council's input and recommendations; and

DVR has a strong collaborative relationship with the SRC. DVR and the SRC worked very closely together to develop the State Plan and in particular, the goals and priorities. The SRC recommends that:

- The DVR bi-annual satisfaction survey include students who are receiving Pre-ETS services. (Goal 5)
- DVR's plan to mitigate the loss of re-allotment funds include specific targets and measures. (Goal 8)
- DVR's plan to establish supported employment services for unserved populations include specific targets for consumers served. (Goal 10)

3. the designated State unit's explanations for rejecting any of the Council's input or recommendations.

Not Applicable

b. Request for Waiver of Statewideness

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

Vermont DVR is not requesting a waiver of Statewideness.

2. the designated State unit will approve each proposed service before it is put into effect; and

Not applicable

3. All State plan requirements will apply

requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Not applicable

c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System.

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. Federal, State, and local agencies and programs;

Jobs for Independence Project: Vermont DVR participated in a joint grant application with the Department of Children and Families, the Department of Labor, and Community College of Vermont to serve SNAP Beneficiaries. It is a SNAP Employment and Training grant designed to target beneficiaries who are recent offenders, individuals with substance abuse disorders and/or are homeless. The design has implemented clinical assessments to determine which beneficiaries are potentially eligible for DVR services. The design models the coordinated approach to services envisioned under WIOA. The project began enrolling individuals in FFY 17. As of December 2017 over 2,700 individuals have been enrolled.

Work4Kids Project: Vermont DVR has a partnership with its Employee Assistance Program (EAP); the Vermont Association of Business, Industry and Rehabilitation (VABIR); and the State of Vermont Office of Child Support (OCS), to serve non-custodial parents with disabilities. The program, called Work4Kids, is offered statewide with designated VR Counselors in each region. VR Counselors provide a range of services to help Work4Kids participants obtain and sustain employment, so they can consistently meet their child support obligations. These services include vocational and other assessments, creating an individualized plan to address potential barriers to employment, counseling and guidance, and referral to other service providers when appropriate. In addition, each VR Counselor works with an Employment Consultant (VABIR), who provides assistance in work search, job placement and post-employment services. For individuals presenting multiple barriers to employment, an individualized service model is utilized. The approach focuses on progressive steps to employment including company tours, informational interviews, work experiences, community service placements, work assessments, and job shadowing. Many non-custodial parents with disabilities have never been helped in any way by the State. Reaching out to and assisting this population has produced positive outcomes. DVR has assisted many Work4Kids participants in securing employment. To date, non-custodial parents referred to the Work4Kids program are paying approximately five times the amount of child support compared with those not referred to the program.

Department of Corrections: DVR also serves offenders with disabilities to achieve employment. Employment is a critical component to prevent recidivism and to assist offenders released from prison in successful reintegration into their communities. DVR has designated VR Counselors in each district office to serve as a single point of contact for the Department of Corrections. Currently there is one Offender Reentry Employment Specialist based in Burlington who is dedicated to employment assistance to offenders with disabilities. Jointly funded by VR and the Department of Corrections, this specialist runs employment groups and does one-on-one job placement for individuals exiting jail or who are on probation.

2. State programs carried out under section 4 of the Assistive Technology Act of 1998;

The State Assistive Technology (AT) program is housed within the Division of Vocational Rehabilitation as part of the Department of Disabilities Aging and Independent Living (DAIL). The AT staff are housed in DVR and receive operational and business office support through DAIL. DVR provides funding for AT services for eligible consumers that are not covered under the Tech Act.

3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture;

None

4. Noneducational agencies serving out-of-school youth; and

DVR has a long-standing agreement with the Department of Mental Health, Children's Unit, Department of Corrections, and Department for Children and Families to fund the JOBS program serving youth with emotional/behavioral disabilities. The JOBS program is a supported employment program serving youth with emotional behavioral disabilities ages 14 to 22. The partnering departments provide the state general fund match for the Medicaid Global Commitment to fund the ongoing support services. The JOBS programs are housed within the Designated Community Mental Health Agencies within the twelve Agency of Human Services Districts.

5. State use contracting programs.

None

d. Coordination with Education Officials

Describe:

1. DSU's plans

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

In DVR Central Office, there is a Transition Program Director who supports all transition activities statewide. The DVR Transition Program Director and DVR Director routinely meet with Vermont Agency of Education staff to coordinate services, and include Department of Labor, Developmental Disabilities Service Division, and Division for the Blind and Visually Impaired staff in these meetings. Vermont DVR has a long-standing commitment to serve students in transition. With the passage of the Workforce Innovation and Opportunity Act (WIOA) in July 2014, DVR built on their existing infrastructure for transition aged youth, to implement Pre-Employment Transition Services (Pre-ETS). DVR currently has fourteen Transition Counselors that serve exclusively in-school students and focus on Pre-Employment Transition Services activities as required in WIOA. The Transition Counselors are operating out of all twelve DVR district offices and cover all Vermont high school districts. Counselors serve as a community resource to the schools, facilitating interagency partnerships through routine Core Transition Team meetings in each of the twelve DVR districts. The goals of these teams are to share resources, partner to support youth, and act as catalysts for change to improve the transition process for youth with disabilities. The Transition Counselors also coordinate with Adult Counselors each spring to facilitate moving VR consumers to adult caseloads to ensure that students graduating and moving on to either post-secondary education or careers have consistent, seamless support during this important transition. To provide Pre-ETS, DVR determined we needed specialized employment placement services designed to meet the needs of students. Therefore, DVR created the Youth Employment Specialist model, and contracted with the Vermont Association of Business, Industry, and Rehabilitation (VABIR) for youth employment services in Vermont. VABIR provides Youth Employment Specialists (YES) to work one on one with Transition Counselors to support Pre-employment Transition Services (Pre-ETS) in all areas of the state. The YES and the Transition Counselor work as a team with each high school, and these teams meet regularly with the Transition Program Director to provide training and share best practices.

The Jump on Board for Success (JOBS) program provides supported employment services for youth with severe emotional and behavioral disabilities. The JOBS programs are operated through local community mental health agencies. JOBS staff and the Transition Counselors coordinate outreach and services with the local high schools for students who are at risk of dropping out of school and six months prior to graduation. The Developmental Services program also works collaboratively with the Transition Counselors to ensure that students who may be both eligible and meet funding priorities for developmental services are referred through the schools to the local Designated Agencies. The Benefits Counseling team collaborates with the Transition Counselors to ensure that students and their families have access to accurate and appropriate benefits information that will allow them to make informed decisions around employment and education choices.

The Linking Learning to Careers (LLC) Work-Based Learning grant funded through the Rehabilitation Services Administration is a five year research study to improve career and college readiness outcomes for Vermont high school students with disabilities. This initiative will provide qualitative and quantitative evidence regarding the impact of LLC services on students' early career outcomes, including paid competitive employment, post-secondary school enrollment, and improved confidence to achieve career goals. The partnership between Community College of Vermont, Agency of Education, Vermont Association of Business, Industry, and Rehabilitation, high schools and career and technical educational centers throughout the state, and DVR, is integral to effective delivery of the services provided within the model. A Linking Learning to Careers Director and Assistant Director support six FTE Career Consultants and two FTE Assistive Technology Specialists, who provide these individualized services to students in the treatment group. As of January 2018, the program has enrolled over 200 VT high school students.

2. Information on the formal interagency agreement with the State educational agency with respect to:

A. consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

The DVR Director and DVR Transition Unit meet quarterly with the Special Education Director of the Vermont Agency of Education and AOE Transition staff, to coordinate the annual Transition Conference, to discuss support and collaboration regarding improvement for Indicators 13 and 14, and to stay coordinated on other transition issues. AOE Transition staff provide ongoing technical assistance to the DVR Transition Counselors, and the DVR Transition Counselors coordinate information and education with schools in their local service areas, including AOE staff attending the monthly DVR Transition Counselor meeting at least once a year. AOE and DVR are currently in the process of finalizing a new Inter-agency Agreement as required under WIOA

B. transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

All DVR Transition Counselors use the Guide to Secondary Transition services: Helping Students with Disabilities Move From School to Work, with special educators in each of the high schools they serve. They also use the Transition Counselor Role and Responsibilities for guidance. They facilitate a "meet and greet" in the fall with special educators to identify specific needs, issues and obstacles in their schools, and create a plan to address them. Local Core Transition Team meetings are being reinstated around the state to support the work of Pre-ETS in WIOA.

C. roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

Financial responsibilities are laid out in the draft MOU with AOE as follows:

DVR/DBVI Responsibilities: To the extent funds are available, DVR/DBVI is responsible for paying for Pre-Employment Transition Services for potentially eligible students. In addition, to the extent funds are available, DVR/DBVI is responsible for paying for vocational rehabilitation and school-to-work transition services for students and youth determined eligible for DVR or DBVI services with an approved Individual Plan for Employment (IPE).

AOE and LEA Responsibilities: AOE and LEAs are responsible for paying for any transition services that are also considered to be special education or related services necessary for providing a free appropriate public education to students with disabilities.

Criteria to Determine Which Agency is Responsible to Pay for Similar Services Both Can Provide under Their Respective Laws: The following criteria shall be used, when determining which entity should pay for a similar service that both entities can provide under their respective laws:

- o The Purpose of the Service Is the purpose of the service primarily related to an educational outcome or an employment outcome?
- o Customary Services Is the service one that the school customarily provides under IDEA Part B? For example, if a school ordinarily provides work-based learning experiences for students with disabilities, the fact those services are now authorized under the Rehabilitation Act as Pre-Employment Transition Services does not mean the school should cease providing those services and refer those students to DVR or DBVI.
- o Eligibility Is the student with a disability eligible for transition services under IDEA? Because the definition of "student with a disability" for the DVR and DBVI programs includes an individual with a disability for purposes of section 504 of the Rehabilitation Act, it is broader than the definition under IDEA. DVR and DBVI are authorized to provide transition services for students with disabilities who meet the definition of an individual with a disability for purposes of section 504 of the Rehabilitation Act.
- o Nothing in this agreement is to be construed as reducing the responsibility of the local education agencies or any other agencies under IDEA to provide or pay for any transition services that are also considered to be special education or related services necessary for providing a free appropriate public education to students with disabilities.

D. procedures for outreach to and identification of students with disabilities who need transition services.

As noted, DVR has now established a cadre of 14 in school Transition Counselors who serve all sixty public high schools in the state. We expect their presence in the schools working with students as young as aged 14, will greatly improve the early identification of students who need transition services. Also as noted, DVR has established a cadre of Young Adult Counselors to facilitate transition of students from PETS to the adult DVR program. The DVR Transition Unit also coordinates with the Division of Developmental Services (DDS) to identify students who are likely to need transitional support into the adult developmental disabilities program.

e. Cooperative Agreements with Private Nonprofit Organizations

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

DVR maintains Social Security Administration, Ticket to Work cooperative agreements with most of the private non-profit employment service providers in the state. Agreements exist with all community mental health and developmental services agencies. In the spring of 2008, DVR negotiated a new Ticket to Work cooperative agreement with the agencies in anticipation of the new regulations to be published later that year. The new agreement has been in place since July 1, 2008 and has generated significant new revenue for providers that help beneficiaries earn at higher levels.

f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

DVR has a well-established agreement with the Vermont Development Disabilities Services Division (DDSD) to provide extended services for individuals with developmental disabilities. The primary source of funding for extended services for individuals with developmental disabilities is Home and Community Based Medicaid Waiver funds. DVR funds supported employment services for youth with emotional/behavioral disabilities in partnership with the Department of Mental Health, Children's Division. The JOBS programs are a model for serving this high need and high risk population. DVR provides the upfront job placement and support through grants to community agencies. The extended supports are provided through Medicaid Global Commitment funds. In prior fiscal years, DVR also had an agreement with the Department of Mental Health to provide extended services for adults with significant mental illness served through the Community Rehabilitation and Treatment Program (CRT). In July 2015, DVR decided to reallocate the VR grant funds to Pre-Employment Transition Services in order to meet the federal mandate. The CRT programs continue to provide supported employment services using a Medicaid case rate funding model. DVR continues to partner with the CRT programs to provide VR services at the local level. For individuals with other disabilities, no state funding for extended services exists in Vermont. As a result, there are limited options for providing extended services for individuals with brain injuries, sensory disabilities, severe learning disabilities and other disabilities. There are some limited options to use Social Security Administration Impairment Related Work Expenses or Plans to Achieve Self Support. These options however, are only feasible in a minority of cases.

g. Coordination with Employers

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR services; and

DUAL CUSTOMER DESIGN

Vermont's dual-customer approach considers both individuals with disabilities and the business community as key customers of the Vocational Rehabilitation program. To that end, Vermont DVR has established a cadre of Business Account Managers across the state whose primary responsibilities are to develop and sustain relationships with the businesses in their respective communities. The Business Account Managers also facilitate local Employment Teams made up of the various employment programs serving Vermonters with disabilities. The Employment Teams are designed to improve collaboration between programs and streamline employer outreach in order to maximize resources and increase opportunities for candidates served by the Vocational Rehabilitation program. In addition to the Business Account Managers, Vermont DVR contracts Employment Consultants who provide placement services and assistance to individual candidates, including retention services. These Employment Consultants, in concert with their respective Business Account Managers, are in the community developing contacts and establishing relationships with businesses of all sizes. Due to the rural nature of Vermont, and the fact that trusting relationships are built over time, Vermont has successfully developed ways to track employer engagement. EMPLOYER DATA DVR tracks employer outreach utilizing Salesforce, a Customer Relations Management (CRM) solution used by many large corporations. All Business Account Managers and Employment Consultants enter information into this system. The information is transparent to everyone and only business information, not client information, is captured. To track employer engagement, the following information is gathered: Opportunities: Opportunities are defined as any activity, paid or unpaid, offered by a particular business. These activities range from informational interviews and job shadows, to short-term work experiences and paid employment. All opportunities are captured for each business.

Contacts: Contacts are defined as the individuals in a business with whom Employment Consultants and/or Business Account Managers have developed a relationship. In many cases these contacts are Hiring Managers, Owners and Supervisors. Activities: Each time an Employment Consultant or Business Account Manager interacts with a contact, an activity note is entered into Salesforce. This allows all Employment Team members to see a running history of conversations and activities with that business.

IMPLICATIONS FOR DVR CUSTOMERS

Business outreach has been a priority for Vermont DVR because: • In developing relationships over time, we are able to position ourselves as a staffing service with a variety of options for businesses to consider;

- Coordinated business outreach, captured in Salesforce, allows for greater variety in the kinds of businesses we are meeting, and the concurrent variety in opportunities for DVR candidates;
- Gathering information on businesses willing to offer worksite experiences, company tours, and informational interview, will better support career exploration and skill development for both adults and students;
- Our business partners can support Pre-Employment Transition Services activities in schools, including practice interviews, company tours and overviews, as well as identify summer employment opportunities;
- Business partners can support the work of our in-school Transition Counselors, providing information on industry trends, skill requirements and other factors related to particular employment sectors;
- By engaging businesses in working with students, the students will have a better understanding of their local labor market through work experiences, job shadows and paid employment. This in turn should prepare them for transition to either post-secondary education or employment.

2. transition services, including pre-employment transition services, for students and youth with disabilities.

As noted in the prior section, the Business Account Managers are a major resource to the 14 DVR Transition Counselors and 14 Youth Employment Specialists, who work exclusively with students to provide Pre-Employment Transition Services. In particular the Business Account Managers provide:

- Contacts with employers who are willing to provide work based learning experiences for students;
- Contacts with employers who are willing to participate IN informational interviews, company tours, practice interviews and other exploratory activities with students;
- Information on industry trends, skill requirements and other factors related to particular employment sectors;
- Identification of summer or part time competitive employment opportunities for students. The Business Account Managers also convene local employment teams including the Youth Employment Specialists. The local employment teams coordinate outreach to employers across DVR programs. This coordinated approach maximizes the impact of DVR employer outreach and reduces duplicate contacts with employers.

h. Interagency Cooperation

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. the State Medicaid plan under title XIX of the Social Security Act;

As Divisions within the Department of Disabilities, Aging and Independent Living (DAIL), DVR and DBVI have entered into an Intergovernmental Agreement with the Department of Vermont Health Access (DVHA). The agreement will be in effect for five years once it is signed. The purpose of the agreement is to describe how Vocational Rehabilitation Title I and Title VI-B funding will be utilized with Medicaid Global Commitment funding to support employment services for the following populations:

- Supported employment services for adults with developmental disabilities served through the Vermont Department of Disabilities, Aging and Independent Living (DAIL) Developmental Disabilities Services Division, hereinafter referred to as DDSD.
- Youth with severe emotional disturbance (SED) served by the Department of Mental Health (DMH), Children's Division through the JOBS programs.
- Adults with psychiatric disabilities served through the Community Rehabilitation and Treatment (CRT) program administered by the Department of Mental Health (DMH).

The agreement sets out the following guiding principles: DAIL/DVR/DBVI and DVHA are committed to implementing employment services through the blending and braiding of VR Title I and Title VI-B funding with DDSD Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide employment services for individuals with developmental disabilities, youth with SED and adults with psychiatric disabilities through a statewide network of community providers. The agreement also lays out eligibility criteria for the respective programs and the financial responsibilities of each State unit as follows:

DAIL/DVR/DBVI Responsibilities:

A. Funding of Time-Limited Supported Employment Services Except for youth with significant disabilities, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DAIL/DVR/DBVI will fund: • Supported employment assessment services • Supported employment job search and placement services • Supported employment work supports • Customized employment • Benefits and work incentive counseling • Progressive employment • Case services for additional work supports such as work clothes and transportation

B. Funding for Extended Supports Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DAIL/DVR/DBVI time-limited services. Extended services can be funded by DAIL/DVR/DBVI for youth with the most significant disabilities, for a period not to exceed four years. DAIL/DVR/DBVI may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

DHVA Global Commitment Funding of Employment Services

A. Developmental Services Supported employment and extended employment services are through the Global Commitment, Home and Community Based Medicaid Services (HCBS) for people who meet the eligibility criteria for DDS. DAIL/DDSD HCBS funding is individualized based on the support needs of the consumer. If the HCBS has a line item for employment, then an employment outcome must be included in the Individualized Support Agreement (ISA). HCBS funding can be used to support both short term assessment, job development, job placement services and extended services.

B. JOBS Program The JOBS program supported employment services and extended employment services are funded through Global Commitment, Medicaid case rate funding administered by DMH. Funds will be provided through the DA Master Grant Agreements.

C. CRT Evidence Based Supported Employment Services CRT evidence-based supported employment services are funded through the Global Commitment, Medicaid CRT Case Rate administered by DMH. Funds will be provided through the DA Master Grant Agreements.

2. the State agency responsible for providing services for individuals with developmental disabilities; and

DVR and DBVI are housed within the same department as the Developmental Disabilities Services Division (DDSD). An Intradepartmental Agreement was developed within DAIL and signed on September 5th 2017. The agreement is in effect for five years. The purpose of this agreement is to describe how DVR, DBVI and DDSD will cooperate to implement, expand and improve supported employment services for adults with developmental disabilities in the State of Vermont. Supported employment services for adults with developmental disabilities are provided through a system of approved nonprofit community providers, including the Designated Agencies (DA), the Specialized Service Agencies (SSA) and Independent Service Organizations (ISO). DDSD, DVR and

DBVI fund supported employment services jointly through grant and contractual relationships with these community providers. The agreement sets out the following guiding principles: DDSD, DVR and DBVI are sister Divisions within DAIL and operate under the direction of the DAIL Commissioner. As such, DVR, DBVI and DDSD take a "one agency" approach to the funding and implementation of supported employment services for adults and youth with developmental disabilities. DVR, DBVI and DDSD have collaborated for over thirty years to implement supported employment services for adults with developmental disabilities. DVR, DBVI and DDSD are committed to continuing this collaboration based on the following:

- All people with developmental disabilities, who want to, can work with the appropriate supports.
- Work benefits people with developmental disabilities in the same way it does people without disabilities. Increased income, a sense of contribution and skill acquisition, increased confidence, independence and social connections all enable people to develop meaningful careers.
- The value of work extends far beyond wages earned. Employers and the community benefit from the social inclusion and diversity people with developmental disabilities bring to the workforce through improved morale, customer loyalty and overall productivity. The agreement includes an inter-division planning and policy group that will meet at least quarterly and include all of the Directors. There is a commitment to joint monitoring of supported employment services and joint training and technical assistance. The agreement also describes the eligibility criteria for each program and lays out the fiscal responsibilities as follows: Joint Responsibilities DVR, DBVI and DDSD are committed to implementing supported employment services through the blending and braiding of VR Title I and Title VI-B funding with DDSD Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide supported employment services for individuals with developmental disabilities through a statewide network of community providers.

DVR and DBVI Responsibilities

A. Funding of Time-Limited Supported Employment Services Except for youth with significant disabilities, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DAIL/DVR/DBVI will fund:

- Supported employment assessment services
- Supported employment job search and placement services
- Supported employment work supports
- Customized employment

B. Funding for Extended Supports Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DVR time-limited services. Extended services can be funded by DVR and DBVI for youth with the most significant disabilities, for a period not to exceed four years. DVR may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

C. Availability of Funding The DVR and DBVI commitment to funding supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DVR may reduce or end funding for supported employment services.

DDSD Responsibilities

A. Funding for Supported Employment Services and Extended Services DDSD will fund supported employment and extended employment through the Global Commitment, Home and Community Based Medicaid Services (HCBS) for people who meet the eligibility criteria for DDS. HCBS funding is individualized based on the support needs of the consumer. If the HCBS has a line item for employment, then an employment outcome must be included in the Individualized Support Agreement (ISA). HCBS funding can be used to support both short term assessment, job development, job placement services and extended services.

B. Availability of Funding The DDSD commitment to funding supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DDSD may reduce or end funding for supported employment services.

3. the State agency responsible for providing mental health services.

DVR and DMH have a long history of collaboration around the provision of supported employment services for adults with psychiatric disabilities and youth with severe emotional behavioral disorders. This is reflected in the MOU's overview and purpose as follows: The purpose of this agreement is to describe how DAIL/DVR/DBVI and DMH will cooperate to implement, and improve employment services, supported employment services and evidence based supported employment services for youth and adults with psychiatric disabilities in the State of Vermont. Supported employment and employment services for youth and adults with psychiatric disabilities are provided through a system of approved non-profit community providers, including the Designated Agencies (DAs). DMH and DAIL/DVR/DBVI fund supported employment services jointly through grant and contractual relationships with these community providers. There are two primary programs within the DMH system that provide employment services:

- The JOBS Program: JOBS provides supported employment services for youth with Severe Emotional Disturbance (SED)
- The Community Rehabilitation and Treatment (CRT) Program: CRT provides employment services and supported employment for adults with severe psychiatric disabilities.

The agreement sets out the following guiding principles: DAIL/DVR/DBVI/DBVI and DMH have collaborated for over thirty years to implement supported employment services for youth and adults with psychiatric disabilities. DAIL/DVR/DBVI and DMH are committed to continuing this collaboration based on the following:

- All people with psychiatric disabilities, who want to, can work with the appropriate supports.
- Work benefits people with psychiatric disabilities in the same way it does people without disabilities. Increased income, a sense of contribution and skill acquisition, increased confidence, independence and social connections all enable people to develop meaningful careers.
- Employment is an essential component of the recovery process for people with psychiatric disabilities.

The agreement forms an inter-agency planning and policy development group including the DVR/DBVI Directors and the DMH Directors of Adult Mental Health and Children's Mental Health, and is in effect for five years from date of signature. The agreement also includes a commitment to joint monitoring of the programs and joint training and technical assistance. DAIL/DVR/DBVI and DMH support two models of individualized supported employment services in competitive, integrated employment settings The agreement describes the eligibility criteria for both systems and the service models as follows: JOBS The JOBS Program is an innovative supported employment and intensive case management service for youth with psychiatric disabilities, who have dropped out or left school. It uses work as a means to reach this challenging population. JOBS is a voluntary program where youth, once engaged, are assisted in transitioning from school, prison, or the streets and supported in accessing services to help them reach their individual goals and greater independence. Individualized Placement and Support (IPS): Evidence Based Supported Employment Services. IPS supported employment is an evidence-based approach to providing vocational services for adults with severe psychiatric disabilities. IPS integrates employment services within community mental health treatment and case management services. DAIL/DVR/DBVI and DMH do not support any type of group or segregated employment service model such

as sheltered workshops, work crews, enclave placements or any approach that does not result in competitive, integrated employment. DAIL/DVR/DBVI and DMH will promote and support evidence based supported employment as the primary service model, through policy development, contract/grant language, training and technical assistance, and monitoring and quality review. The agreement describes the fiscal responsibilities of the respective Departments as follows: Joint Responsibilities DAIL/DVR/DBVI and DMH are committed to implementing supported employment services through the blending and braiding of VR Title I and Title VI-B funding with DMH Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide supported employment services for adults with psychiatric disabilities and youth with SED through a statewide network of community providers.

DAIL/DVR/DBVI Responsibilities

A. Funding of Time-Limited Supported Employment Services Except for youth with significant disabilities, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DAIL/DVR/DBVI will fund: • Supported employment assessment services • Supported employment job search and placement services • Supported employment work supports • Customized employment • Benefits and work incentive counseling • Progressive employment • Case services for additional work supports such as work clothes and transportation

B. Funding for Extended Supports Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DAIL/DVR/DBVI time-limited services. Extended services can be funded by DAIL/DVR/DBVI for youth with the most significant disabilities, for a period not to exceed four years. DAIL/DVR/DBVI may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

C. Availability of Funding The DAIL/DVR/DBVI commitment to funding supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DAIL/DVR/DBVI may reduce or end funding for supported employment services.

DMH Responsibilities

A. Funding for JOBS DMH will fund the JOBS program supported employment services and extended employment services through Global Commitment, Medicaid Case Rate funding. Funds will be provided through the DA Master Grant Agreements.

B. Funding for IPS Supported Employment Services and Extended Services DMH will fund evidence-based supported employment through the Global Commitment, Medicaid CRT Case Rate. Funds will be provided through the DA Master Grant Agreements.

C. Availability of Funding The DMH commitment to funding JOBS and IPS supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DMH may reduce funding for supported employment services. .

i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. Data System on Personnel and Personnel Development

A. Qualified Personnel Needs.

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

i. the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

(A) Qualified Personnel Needs

DVR has a total of 121.5 Full Time Equivalent (FTE) staff positions. The Division operates using a matrix management structure headed by the Division Director. The breakdown of staff is as follows:

Full Time Equivalents Position Titles and Functions 1 Division Director 6 Senior Central Office Managers including the Field Services Manager, Employment Services Manager, Quality Assurance and Business Systems Manager, DVR Administrative Services Manager, Budget and Policy Manager, and the Transition Program Director 7 Regional Managers overseeing the 12 district offices 13.5 DVR Transition Counselors serving an in-school youth caseload 9 DVR Young Adult Counselors serving a youth caseload 29 DVR Counselors Serving an adult caseload 4 Benefits Counselors 2 Rehabilitation Counselors for the Deaf 17 Program Techs and Administrative Support Staff 12 Employee Assistance Manager and Specialists 1 Special Project Coordinator 1 Data Management and Program Evaluation Staff 3 Business Account Managers 2 Assistive Technology Staff and Manager 4 Miscellaneous Central Office Staff 10 Linking Learning to Careers Managers and Counselors

ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and DVR currently has sufficient staff to meet the needs of eligible individuals who have applied for services.

iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

DVR assesses the ability to provide an adequate supply of qualified State rehabilitation professionals and paraprofessional personnel through analyzing customer data collected on a yearly basis and comparing it to staff capacity to provide services adequately. DVR collects data related to caseload size, number of referrals received, applications submitted, cases certified, plans created, and training and employment outcomes at individual, district, regional and statewide levels This analysis informs the number of positions designated to each geographic area and the design and delivery of services. This analysis and subsequent staffing decisions, related to assurance of adequate personnel development, are completed with the oversight of the DVR Senior Management team and the input of the DVR Regional Management team. Projections of personnel that will be needed in five years

to meet the demand of the number of individuals to be served are static. This is due in part to the way the DVR program is structured, which will allow an increasing number of individuals to receive quality service with the existing personnel. All State rehabilitation personnel will continue to obtain the required level of education and training within established time-frames and with adequate supervision to ensure quality service delivery.

B. Personnel Development

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

- i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

Vermont has no accredited graduate school offering a master's degree in Rehabilitation Counseling. To meet the Comprehensive System for Professional Development (CSPD) standards, a counselor needs either a master's degree in Rehabilitation Counseling or a master's degree in a related field plus completion of four additional core rehabilitation courses. Assumption College, University of Massachusetts, and Springfield College of Human Services typically have a range of 35-45 students who graduate with a master's or CAG degree in Rehabilitation Counseling per year. These graduates would be qualified to fill counseling vacancies without additional coursework. New England colleges, which offer degrees in Social Work, Special Education School Guidance, Mental Health Counseling, or Community Mental Health Services, also produce qualified graduates.

- ii. the number of students enrolled at each of those institutions, broken down by type of program; and

Currently four (4) students are taking required core classes through Assumption University and UMASS Boston.

- iii. the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

In the prior year, four (4) staff members met the educational requirements of the CSPD courses through Assumption University and University of Massachusetts. Additionally, two (2) other staff who already met the educational requirements through a related degree and core course completion, are voluntarily participating in a three year master's degree program in Rehabilitation Counseling through the University of Southern Maine, with the goal of obtaining Rehabilitation certifications as Rehabilitation Counselors upon completion.

2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

DVR recruits qualified personnel through Assumption College, University of Massachusetts, and Springfield College of Human Services, who have received a master's degree in Rehabilitation Counseling. These graduates meet the highest standard of education and are able to obtain certification at the highest level for this field. DVR also recruits qualified personnel in a related field such as Social Work, Special Education, School Guidance, Mental Health Counseling, or Community Mental Health Services from New England colleges, by posting positions on internal employment pages of the various college websites. All of these graduates are candidates for counseling vacancies if they are willing to complete the four core rehabilitation courses.

State personnel policies require DVR to consider qualified applicants on the Reduction in Force list before other applicants. DVR advertises openings through the State recruitment system, through local newspapers (coordinated ad program), on-line on USA Today Job Network, and by listing openings through college placement services. Assumption College, University of Massachusetts, and Springfield College of Human Services advertise counselor openings by forwarding job opportunities to their list of recent graduates.

When recruiting staff to serve a specific population such as the deaf and hard of hearing, additional recruitment efforts are employed to reach professionals within that community and associated training programs. This has included posting in the Boston Globe and connecting with deaf and hard of hearing student organizations in New England based colleges.

The state of Vermont is an equal opportunity employer and there is emphasis on recruiting and hiring individuals with disabilities. We encourage DVR consumers to apply for posted positions and obtain the education necessary to be competitive. DVR also promotes close working partnerships with the Vermont Center for Independent Living, Designated Mental Health Agencies, the Refugee Resettlement program, Vermont Works for Women and other organizations who serve people with disabilities and/or are of a minority status.

3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

The Division follows standards set forth in the Comprehensive System for Professional Development (CSPD). This prescribes a national standard for vocational rehabilitation counselor qualifications. This standard gives highest priority to counselors with a master's degree in Rehabilitation Counseling. The second level of priority is for counselors with related degrees in Social Work, Psychology, Mental Health Counseling or Special Education. This group must complete four additional courses to meet the standard: Foundations of Rehabilitation, Career Counseling, Vocational Assessment, and Medical and Psychosocial Aspects of Disability. When unable to recruit qualified candidates that meet the two highest levels, DVR hires counselors with bachelor's degrees and supports their graduate training through our RSA training grant. Though not required by the Division or by RSA, some counselors continue on to become Certified Rehabilitation Counselors (CRC) through the Commission on Rehabilitation Counselor Certification.

The following is a breakdown of the educational plans for DVR staff. These plans fall into a three category system, based on the availability of existing financial resources and are consistent with any national or State-approved or recognized requirements that apply to the profession or discipline in which personnel are providing VR services:

Category 1: Staff who meet the highest standards for education and/or certification: Staff in this category have completed a master's degree in Rehabilitation Counseling and/or have received certification as a Rehabilitation Counselor. DVR currently has ten (12) staff or 20% who are in this category.

Category 2: Staff who do not yet meet the highest standards and are currently enrolled in an approved graduate or undergraduate program: Staff in this category are pursuing a master's degree in Rehabilitation Counseling or a related field and have additional supervision and oversight. DVR currently has two (2) staff or 3% who are in this category.

Category 3: Staff who have graduate degrees in counseling or a related field and are required to take four core rehabilitation courses in order to comply with the CSPD requirements: DVR currently has nine (10) staff or 16% who are in this category.

The percentage of our current counselors having met the CSPD standard through Categories 1 and 3 is 82%, which is 50 Counselors out of 61. The timelines for meeting graduate training are written into the job specifications, which all candidates have access to on the State of Vermont Department of Human Resources website. Counselors are required to meet the standard within three years. All training information related to core courses and completion of master degrees is stored on a spreadsheet maintained by the Division's DVR training coordinators. Supervisors are given quarterly updates to monitor progress.

DVR staff upon hire, are required to attend a 30 hour DVR services training program taught by the Staff Development and Training Coordinator. This training covers DVR's Policies and Procedures Manual, the full vocational rehabilitation process from referral to successful closure, effective caseload management, collaboration with partners providing employment services, and all other aspects of the vocational rehabilitation.

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.

See Section A.

4. Staff Development.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. System of staff development

a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

Staff development opportunities are provided annually to ensure all personnel receive appropriate and adequate training in multiple categories that include assessment, vocational counseling, job placement, and rehabilitation technology.

DVR staff receive training related to assessment through webinars and in-person training offered by the Staff Development and Training Coordinator and Assessment Champion team, which is comprised of staff who are knowledgeable about administration, interpretation, and application of various vocational assessments. This team also reviews assessment tools on a yearly basis to identify those that are no longer relevant or those that need to be included in the DVR Assessment Inventory, which is a selection of assessment tools used to assess a person's interests, values, aptitudes, and skills. Skillful interviewing also serves as a form of assessment and DVR staff and contracted partners receive introductory and advanced training in Motivational Interviewing to enhance this skill set.

Motivational Interviewing (MI) training was introduced to DVR with comprehensive training for all staff in 2014. In alignment with the goals of the initiative, internal trainers are now in place statewide and provide monthly training for district staff. Statewide introductory and advanced MI trainings are offered quarterly for all new staff. Motivational Interviewing is a counseling approach that enhances counseling skills in many arenas and is an especially good fit for vocational rehabilitation counseling. Nationally, Motivational Interviewing is being used by many State Vocational Rehabilitation Agencies/Departments to provide services and effectively engage consumers in making changes that improve their lives. MI is a person-centered approach with a focus on client choice, self-efficacy, and autonomy. This practice is especially useful for consumers with disabilities. There are also well established results available regarding its effectiveness with those who experience substance abuse issues as disabling conditions. A high number of DVR consumers struggle with substance and alcohol addiction, which reinforces the relevance of having staff trained in MI techniques and practice. Sustainability of this initiative is underway and will occur through ongoing development of the internal DVR MI trainers to ensure training is available to all DVR staff and meets the training requirements of those providing direct service. The internal DVR MI trainers have already received additional MI focused facilitation training and next steps include advanced audio recording coding and scoring training. This will allow the MI trainers to evaluate staff level of proficiency in use of MI skills, strategies, and approach in the vocational counseling process with fidelity to the model/approach and design training and support that responds to the area needing development.

Staff development related to job placement is provided through several venues. Newly hired contracted staff who provide placement services, participate in a required online training program, created in collaboration by DVR and Community College of Vermont. Internal structures that ensure development of knowledge related to the labor market and effective job placement include regularly scheduled meetings hosted by the DVR funded Business Account Managers. One such meeting is comprised of employment staff connected by Creative Workforce Solutions, a DVR initiated collaboration of Agency of Human Services funded employment programs, which promotes cooperative job placement and employer relationships. Training related to rehabilitation technology is provided initially through the DVR services training program for new hires. Additional training and staff development is provided in collaboration with the Assistive Technology Program through on-site, video conferencing, and webinar based trainings, information sessions, and regularly scheduled staff meetings.

A specific staff group, the DVR Benefit Counselors, receive specialized training to ensure the provision of quality services in working with customers who receive monetary or medical benefits. Ongoing training and support is provided by a DVR Project Manager. The local Social Security Administration (SSA) Area Work Incentives Coordinator provides quarterly trainings to the Benefits Counselors on a variety of SSA Work Incentives issues. SSA also provides training and technical assistance for Benefits Counselors through contracts with Cornell and Virginia Commonwealth University. DVR is the SSA Work Incentives Planning and Assistance grantee for the State of Vermont. The four Benefits Counselors working under that project are certified by SSA as Certified Work Incentive Counselors (CWIC). To achieve certification, Benefits Counselors must attend a week long training and complete a comprehensive "take home" assignment that is evaluated by Virginia Commonwealth University staff.

B. Acquisition and dissemination of significant knowledge

procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

The DVR training coordinators are the primary hub for dissemination of research and training resources to field staff. Program managers, including the Transition Program Director, the Employment Services Manager and the Benefits Counseling Program Coordinator collect and disseminate information from local and national resources. Program managers and staff are encouraged to become members of national organizations in their fields. Organizations like the National Skills Coalition or the National Association of Benefits Planning and Work Incentive Counseling (NABWIS) are excellent resources for managers and front-line staff.

5. Personnel to Address Individual Communication Needs

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

The Agency of Human Services has a contract with the Association of Africans Living in VT for on-site interpretation and translation services. If an appropriate interpreter is not available, the VT Refugee Resettlement Program has a contract with Language Learning Enterprise Inc. in Washington D.C. which provides telephonic interpretation.

6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

The DVR Director and other senior managers meet quarterly with the Deputy Commissioner of the Agency of Education (AOE) and the Special Education Director to coordinate activities and trainings, especially around transition issues. DVR and AOE have a long history of co-sponsoring trainings and conferences for frontline staff.

j. Statewide Assessment

(Formerly known as Attachment 4.11(a)).

1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

A. with the most significant disabilities, including their need for supported employment services;

The Rehabilitation Act (1973) requires the Vermont Division of Vocational Rehabilitation (DVR) and the Vermont State Rehabilitation Council (SRC) to jointly conduct a needs assessment every three years. The assessment is intended to form the basis for the DVR annual State plan and strategic planning activities. The 2017 DVR and SRC Needs Assessment focused particularly on the VR services needs of the following populations: • Individuals with the most significant disabilities, particularly their need for supported employment; • Individuals with disabilities who are minorities, including refugees; • Individuals who have been unserved or underserved by DVR; • Individuals with disabilities served through the statewide Workforce Investment System; and • Individuals who are youth with disabilities and students with disabilities, including, as appropriate, their need for Pre-Employment Transition services or other transition services. A comprehensive report of the results of the Vermont DVR and SRC Needs Assessment was submitted in 2017. The report includes data from a variety of sources, including DVR's Rehabilitation Services Administration (RSA) reporting database, information from the United States Census Bureau, the American Community Survey, as well as surveys conducted by DVR. Although not specifically designed to assess unmet needs, these surveys assisted DVR in determining ways to better serve individuals with disabilities, thereby making its services more accessible and welcoming to populations that may not be currently served.

B. who are minorities;

The American Community Survey (ACS) provides data on disability and race by state. Overall, 3.8% of Vermonters are from an ethnic minority. The following table shows the ACS estimates of the incidence of disability by race.

The disability rates for African Americans and Asians in Vermont exceed the average. However, the estimates for the Vermont non-white populations with disabilities are from sample sizes of less than 40 people and too small to be statistically reliable. As a result, this data may substantially over state the actual rate of disability in these groups. Vermont VR has consistently exceeded the federal RSA standard and indicator that measures access to services by eligible individuals who are minorities. In FFY 2016, 7% of DVR closures were for individuals from an ethnic minority. Given this data it appears that individuals with disabilities from ethnic minorities are accessing the VR program at a rate proportional to individuals who are white.

C. who have been unserved or underserved by the VR program;

Older Vermonters with Disabilities The percentage of individuals with disabilities age 55 and above, increased from 12.3% to 13.9% between 2013 and 2016. This seems to reflect the overall aging of the Vermont demographic. The percentage of people served over 65 also increased during this period, from 1% to 3%. Individuals over the age of 55 are working longer, not only for financial reasons but because people are living longer and choosing to remain in the workforce. It is likely that many individuals over the age of 55 experience disabilities and may be eligible for VR services. DVR now oversees the Senior Community Service Employment Program (SCSEP), and has hired a "Mature Worker Program Coordinator". A primary role of the coordinator is to facilitate the referral of eligible individuals to DVR, by building and supporting strong linkages with services for mature workers. Individuals with Physical Disabilities DVR suspects that individuals with physical disabilities may be under-served, especially since the number of individuals with psychiatric disorders and substance disorders has increased. It may be that individuals with physical disabilities are not seeking services because their needs are less complex. In addition, DVR recognizes that employers require a more diverse selection of candidates to fill more skilled positions. Although DVR has initiated preliminary outreach to medical providers and community partners to diversify its caseload, more systematic and strategic planning is required. Individuals with Traumatic Brain Injury (TBI) It is estimated that at least 10,000 Vermonters are recovering from brain injury, but less than 5% of these individuals are seeking services to help them succeed in the workplace. DVR counselors and CRP (Community Rehabilitation Provider) staff have received training on TBI. There are no discrete employment services for individuals with TBI.

D. who have been served through other components of the statewide workforce development system; and

DVR does not currently have good data on the needs of individuals who have been served through other components of the workforce development system. As part of the WIOA Unified Plan DVR and VDOL and AOE will implement a variety of strategies to share data and coordinate service provision. A data sharing agreement was finalized in March 2017. This process will assist the three agencies develop a much better understanding of the needs of their consumers across programs. In particular, we expect closer coordination at the field level to result in an increase in consumers being served concurrently across programs.

E. who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

In 2017 DVR conducted a Comprehensive Needs Assessment including an assessment of the needs of youth and students with disabilities. The primary findings were as follows: Strengths of the Vermont System In the school year 2016-17, approximately 1 in 5 (18.5%) eligible students received Pre-ETS services statewide. This suggests DVR has been successful in making Pre-ETS services accessible to eligible students. Overall, youth with disabilities appear to be accessing DVR services at a high rate (up to 35% of the eligible population). This data suggests DVR has been successful in making services accessible to youth. DVR has a strong collaborative partnership with AOE at the state level. At the local level, almost all Vermont high schools are working in partnership with DVR to facilitate the provision of and access to Pre-ETS and transition services. Vermont has a good infrastructure to provide supported employment for youth with developmental disabilities and emotional/behavioral disabilities. Areas for Development in the Vermont System Core transition teams have formed and met in all 12 Agency of Human Services districts. Most are in the early development stage however, and are working out local processes and agreements. These teams will need time and support to become fully functional and effective groups. Youth with disabilities are less likely to obtain competitive employment during the transition years. Early employment experiences are a strong predictor of adult employment success. According to VFN, students who have had work experiences expressed more confidence in their ability to work. This suggests youth need more opportunities for real work based learning experiences and/or competitive employment. Post-secondary education and training opportunities are key for students and youth with disabilities to access higher wage jobs and develop long term career opportunities. Students and youth with disabilities are less likely than their peers without disabilities, to access post-secondary education.

2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

Because of the small population and rural nature of Vermont, there are very few CRPs in the state. VABIR (the Vermont Association of Business, Industry and Rehabilitation) is the primary CRP for the DVR program with the exception of supported employment. VABIR has capacity to serve DVR consumers statewide and has an excellent track record. VABIR also serves individuals without disabilities through the state TANF program. DVR provides grants to Vermont's Designated Agencies for employment services for individuals with developmental disabilities and individuals with severe and persistent psychiatric disabilities. Easter Seals also has a small presence in Vermont. While DVR is open to supporting the development of new CRPs as well as existing CRPs who come to Vermont, there is limited funding available to support multiple agencies. DVR partnered with other state agencies, VABIR and the Designated Agencies, to create an online training program for CRP staff hosted by Community College of Vermont. The program allows cohorts of employment staff to access training statewide. The content is modified to the specific populations served.

3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act .

(A) Students with Disabilities The State of Vermont has sixty supervisory unions serving students in primarily rural communities. During the 2016 to 2017 school year, 5,390 Vermont high school students were served. All were either on an IEP or 504 plan, and therefore met the definition of a student with a disability.

(B) Youth with Disabilities According to American Community Survey (ACS), 7.5% of youth ages 16 to 20 (3,450) reported having a disability. The ACS does not provide data for youth ages 14 to 24 who report having disability, which is the WIOA definition. However, extrapolating the ACS data for youth ages 16 to 20 would suggest that there are approximately 8,600 youth with disabilities in Vermont. It is important to note that the ACS uses primarily self-reported data and youth may be less likely to self-identify as a person with a disability. Therefore, this number maybe an underestimate of the actual prevalence.

(C) Employment Rates for Youth with Disabilities The ACS provides data on the employment rate of youth with disabilities ages 16 to 20. As Table 4 shows, youth with disabilities are much less likely to be employed than their counterparts without disabilities at both the national and state level. It is well documented that early work experiences for students and youth are the best predictor of future employment. The gap in employment rates in this age group is likely to continue into adulthood unless students and youth with disabilities have opportunities for work based learning experiences.

Table 4: Employment Rates for Youth With and Without Disabilities

Population	Total	Employed Count	Employed Percentage
US Youth without Disabilities	20,268,600	7,539,919	37.2%
Vermont Youth without Disabilities	42,600	18,190	42.7%
US Youth with Disabilities	1,266,800	288,830	22.8%
Vermont Youth with Disabilities	3,400	952	28%

(D) Postsecondary Education Outcomes for Adults with Disabilities The ACS does not provide post-secondary education outcome data stratified by age group. However, it does provide highest level of education achieved for adults with and without disabilities. As the data in Table 5 indicates, adults with disabilities are much less likely to achieve a BA degree or higher than adults without a disability. Post-secondary completion has been associated with substantially level earnings over the lifespan. In the modern global and high technology economy this trend is likely to become more pronounced.

Table 5: Adults With and Without a Disability Achieving a BA Degree or Higher

Population	Total	BA Degree or Higher Count	BA Degree or Higher Percentage
US Adults without Disabilities	164,707,900	54,353,607	33%
Vermont Adults without Disabilities	320,700	127,318	39.7%
US Adults with Disabilities	19,703,800	2,758,532	14%
Vermont Adults with Disabilities	45,600	7,342	16.1%

(E) VR Pre-Employment Transition Services Once Pre-ETS was announced in October 2014, Vermont DVR moved quickly to come into compliance with the new requirement. As a state, we took a broad strategic approach to:

- Embrace the Congressional intent: try to build the best possible Pre-Employment Transition Services program possible;
- Reassign resources to support the best possible outcome;
- Build on the existing well-established infrastructure of the DVR statewide transition program of specialized VR counselors. Vermont took a life span view in our response to the Pre-ETS requirement. Since DVR was going to invest 15% or more of its

resources providing Pre-ETS for high school students, we wanted to make sure there was VR capacity to serve them if they graduated on to VR services. Therefore, Vermont invested an equivalent amount of resources in youth post high school to preserve DVR's investment in Pre-ETS and to ensure eligible students had access to VR services.

To achieve this DVR deployed its counselor resources as follows:

- 20% of VR counselor capacity (14.5 FTEs) assigned to serving exclusively high school students, providing and arranging for primarily Pre-ETS Required Services.
- 20% VR counselor capacity (14.5 FTEs) assigned to youth or young adults in the senior year of high school or after high school exit (18-27).
- 60% of VR counselor capacity serving adults (27+) including Rehab Counselors for the Deaf. In federal fiscal year 2017, DVR experienced a significant reduction in the VR grant award. This will require DVR to reduce our non-Pre-ETS counseling capacity. This has affected the number and deployment of counselors serving the out of school youth and young adult population. As of May 2017, DVR had 9 Young Adult counselors remaining from the original 14.

(F) Staffing of Pre-ETS Required Services 14 VR counselors providing Pre-ETS services were deployed statewide to serve all 60 supervisory unions in the state. VR Counselors were out posted to an average of four high schools each, to ensure statewide access for eligible students. The daily presence of VR counselors in local high schools allows them to build strong working relationships and coordinate services with school staff. DVR also contracted with our primary CRP VABIR, to support 14 youth employment specialists to provide Pre-ETS services. The school-based counselors and youth employment specialists essentially work as a team. The focus of the youth employment specialists is work place readiness training, arranging for work-based learning experiences and instruction in self-advocacy.

(G) The Number and Proportion of Students Receiving Pre-ETS Services and/or VR Services The number of students receiving Pre-ETS and/or VR services increased between the implementation of Pre-ETS in federal fiscal year 2015, and FFY 2016. This increase would be expected since Pre-ETS services were being ramped up during this period.

Table 6: Students With Disabilities Served- Age 14 through 21 at Referral (00 status and above, open in period, in high school) Period Cases Persons FFY 2015 852 846 FFY 2016 1,302 1,300

During the 2016/17 school year 1,019 students with disabilities were enrolled in Pre-ETS and/or VR services out of a potentially eligible population of 5,390. This means 18.9% of potentially eligible students were receiving Pre-ETS and/or VR services during the school year.

(H) VR Services for Youth who have Exited High School VR Transition counselors transfer students to a Young Adult or Adult VR counselor prior to high school exit. This generally occurs in the last semester of the student's senior year, but may occur earlier based on circumstance. As noted earlier, DVR developed a cadre of 14 Young Adult counselors to match the capacity of VR Transition counselors serving students in school. The intent was to have specialized Young Adult counselors who understand the needs of youth in transition. Unfortunately, due to reductions in federal funding, DVR no longer has the capacity in smaller offices to offer this level of specialization. In some offices, the Young Adult counselor role has been converted to a general counselor role serving all age groups. As of May 2017, DVR had 9 Young Adult counselors remaining from the original 14. DVR is concerned that the loss of Young Adult counselors may have an impact on services for youth who have graduated from high school. It has been Vermont's experience that serving youth is more qualitative than serving adults and requires a different approach. Historically, VR Transition Counselors served both in and out of school youth, and received specialized training and support focused on serving youth. The loss of this specialization may have an impact on youth services and outcomes.

(I) Supported Employment Services for Youth In addition to core VR services, DVR partners with other state agencies to fund the JOBS program. The JOBS Program is an innovative supported employment and intensive case management service for youth with SED, who have left or dropped out of school. The program is voluntary and uses work as a means to reach this challenging population. Once engaged, youth are assisted in transitioning from school, prison, or the streets and supported in accessing services to help them reach their individual goals and achieve greater independence. The funding comes from a combination of state funds and Medicaid match from Vocational Rehabilitation, Mental Health, Corrections and Children and Family Services. In addition to community and state partners, JOBS programs involve employers in meeting the needs of youth through intensive job development, placement, and on and off-site training support. Employment is a non-stigmatizing service that youth want and need. JOBS programs differ from other traditional employment models by providing intensive case management services to assist with other areas of need including legal issues, benefits counseling, homelessness, drug/alcohol abuse, and probation and parole.

(J) Supported Employment for Youth with Disabilities Vermont has a very strong supported employment infrastructure for youth with developmental disabilities that has been recognized both nationally and internationally. Employment retention for eligible students who exit high school with a job is a priority for the Developmental Disabilities Services Division (DDSD) and is included in their System of Care Plan. This creates a strong incentive for schools and DVR to help youth with developmental disabilities find employment before they exit high school. DVR and DDSD collaborate to identify students who have a developmental disability and are likely to graduate. The June Graduates survey assists DDSD and DVR to effectively plan for transitioning students district by district. It also allows DDSD to predict caseload funding needs statewide. DVR has also partnered with DDSD to provide post-secondary education options for individuals with developmental disabilities. Vermont has four post-secondary programs for individuals with developmental disabilities including Project Search, SUCCEED, and College Steps. In general DVR funds tuition and ancillary supports and DDSD funds staffing costs. (K) The Number and Proportion of Youth Receiving Services Transition and Pre-ETS services naturally overlap to a significant degree. As noted, the VR Transition counselors are exclusively serving the student population in partnership with the contracted VABIR Youth Employment Specialists. Youth who have exited high school are served by a VR counselor specializing in youth and young adults or a general counselor. The total number of youth served by VR has increased modestly since 2015, most likely due to the increase in students served under Pre-ETS.

Table 7: Youth With Disabilities Served- Age 14 through 24 at Referral (00 status and above, open in period) Period Cases Persons FFY 2015 3229 3091 FFY 2016 3320 3202

Based on the ACS data, DVR estimates there were 8,600 youth with disabilities in the state of Vermont in 2015. DVR served 3,091 youth with disabilities during federal fiscal year 2015. This suggests that DVR is serving up to 35% of the eligible population. As noted earlier, DVR suspects the ACS data may underestimate the true number of youth with disabilities because young people often do not want to identify as having a disability. DVR coordinates VR services with services provided under IDEA (Individuals with Disabilities Education Act) at both the state and local level. State Level The Vermont Agency of Education (AOE) and DVR have

agreed to meet quarterly to discuss the coordination of services within local school districts. In general, those meetings include the following:

- The DVR Director
- The DVR Transition Program Director
- The AOE Special Education Director
- The AOE Postsecondary and Transition Coordinator.

In addition to the above, DVR and AOE have frequent ad hoc meetings related to transition services and to plan joint initiatives. DVR and AOE are currently collaborating around the implementation of the Linking Learning to Careers demonstration funded through the federal Department of Education. LLC is an exciting new opportunity to improve career and college readiness outcomes for Vermont high school students with disabilities. This 5-year statewide initiative will build on effective career exploration and employment services already provided to students and engage them in additional experiences that will help them successfully transition from high school into adulthood. LLC is a powerful collaboration of the following partners: Community College of VT (CCV), VABIR, the Agency of Education, high schools, career and technical education centers, and DVR. It is expected that the partnership with CCV in particular will open up post-secondary education opportunities for students with disabilities. Local Level A primary responsibility of the VR Transition counselor is to coordinate services with the schools. VR Transition counselors spend the bulk of their time in schools, working directly with special education staff and teachers to provide services to students. This strong on the ground presence allows VR Transition counselors and school staff to build close and collaborative working relationships. In order to improve transition outcomes for students, DVR took the lead in forming core transition teams in all twelve districts last year. The purpose of the core transition team is to bring DVR, schools, and community agencies together to improve collaboration around services for transitioning students. The core teams include:

- Local school staff
- DVR
- Developmental services providers
- Children's and adult mental health providers
- The Department of Labor youth staff
- Other youth programs

The core transition teams are still in the early development. As of May 2017, all 12 have had at least one meeting.

k. Annual Estimates

Describe:

1. The number of individuals in the State who are eligible for services;

Based on the American Community Survey (ACS) for 2014, DVR estimates that there are 45,076 Vermonters between the ages of 16 and 64 with a disability. All of these people are potentially eligible for services under this Plan

2. The number of eligible individuals who will receive services under:

A. The VR Program;

An estimated 8,134 individuals will receive VR Program services in FY 2018 with funds provided under either Part B of Title I of the Act or under Part B of Title VI.

B. The Supported Employment Program; and

For FY 2018 we estimate that 400 individuals will receive supported employment services through DVR. This number does not include individuals receiving extended supported employment services funded through Medicaid and other non-VR funding sources.

C. each priority category, if under an order of selection;

On July 1, 2016, DVR transitioned to a new Order of Selection with four categories instead of three. Under the new order of selection we estimate that:

- 5,806 Priority Category 1 customers will be served;
- 2,021 Priority Category 2 customers;
- 299 Priority Category 3 customers;
- 22 Priority Category 4 customers.

For FY 18 we expect Category 4 to be a closed Category and individuals found eligible under this category to go on a waiting list. DVR will consult with the SRC at least quarterly to determine if the category should be opened.

3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

Under the new Order of Selection we anticipate that individuals under the new Category 4 will be on the waiting list for the program. We estimate about 22 individuals will be found eligible under this Category in FY 18.

4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

Total costs to serve individuals in all four categories for FY 17 will be approximately \$15,058,401. Estimated costs of services for each category are:

- Priority Category 1: \$8,892,982 Title I, \$142,059 Title VI-B
- Priority Category 2: \$5,632,221 Title I, \$94,706 Title VI-B

- Priority Category 3: \$250,000 Title I
- Priority Category 4: \$46,433 Title I

I. State Goals and Priorities

The designated State unit must:

1. Identify if the goals and priorities were jointly developed

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

Based on the DVR/SRC Needs Assessment completed in December of 2017, DVR and the SRC have established targets for Program Year 2019 for DVR's Strategic Plan goals. DVR and the SRC have also established goals and priorities in response to the new mandates and requirements included in the Workforce Innovation and Opportunities Act (WIOA). In particular, DVR and the SRC established goals and priorities related to the implementation of the WIOA Common Performance Measures. All DVR goals and priorities are established within the Division's long established strategic themes as follows:

- Organizational Effectiveness
- Valued and Empowered Employees
- Prepared Job Seekers
- Collaborative Partnerships

(A) Program Year 2019 Goals and Priorities

1. DVR will align services to support consumers in achieving the WIOA Common Performance Outcome Measures.

Program 2019 Measures:

a. Employment retention six months post closure b. Employment retention twelve months post closure c. Median earnings six months post closure d. Credential attainment rate e. Measurable skills gains f. Employer engagement

Program Year 2019 Target: DVR will be collecting and reporting baseline data to RSA during this period.

2. DVR will increase the percentage of consumers earning over 110% of minimum wage and over 150% of minimum wage at closure. DVR believes in order to increase median earnings six months post closure, the agency must increase earnings at closure. Based on Needs Assessment data from 2017, 55% of DVR consumers were earning 110% of minimum wage or less at closure and only 18% of DVR consumers were earning over 150% of minimum wage at closure.

Program Year 2019 Measures:

a. The percentage of DVR consumers with earnings greater than 110% of minimum wage at employment closure. b. The percentage of DVR consumers with earnings greater than 150% of minimum wage at employment closure.

Program Year 2019 Targets:

a. 55% of DVR consumers will earn 110% or greater of minimum wage at closure. b. 25% of DVR consumers will earn 150% or greater of minimum wage at closure.

3. DVR will increase consumer opportunities to participate in and gain industry recognized credentials in middle skills professions. Industry recognized credentials are a proven mechanism for consumers to access higher wage employment. This will include sector-based training programs in collaboration with the Career and Technical Education Centers and Community College of Vermont.

Program Year 2019 Measure: Number of individuals achieving credential attainment.

Program Year 2019 Target: DVR will be collecting baseline data during this period.

4. DVR will continue to expand efforts to effectively serve employers through Creative Workforce Solutions (CWS).

Employer engagement continues to be a critical activity to ensure DVR consumers have access to employment opportunities.

Program Year 2019 Measure: Employer engagement with DVR as tracked through the CWS Salesforce account management system.

Program Year 2019 Target: DVR will maintain active relationships with 2,500 employers statewide during the program year.

5. Consumer satisfaction with DVR services will be maintained or increase.

Program Year 2019 Measure: Bi-annual consumer satisfaction survey.

Program Year 2019 Target: DVR will achieve an 87% or better overall consumer satisfaction rating. Consumers reported an 87% overall satisfaction rating in the most recent survey (2016).

DVR will also develop a process to assess student and parent satisfaction with Pre-ETS services. DVR will explore approaches to conducting such an assessment and develop metrics to track. 6. DVR will implement a comprehensive quality assurance process incorporating the new AWARE case management system. In 2017 DVR successfully implemented the AWARE case management system. This system will provide DVR with a powerful new tool to upgrade the quality assurance process.

Program Year 2019 Measure: Design and implementation of the quality assurance system.

Program Year 2019 Target: Process evaluation of QA system (to be determined).

7. DVR will continue to implement highly effective Pre-Employment Transition Services (Pre-ETS) for students statewide.

Program Year 2019 Measures:

a. The percentage of high schools statewide that have at least one student actively participating in Pre-ETS through DVR. b. The percentage of all potentially eligible students statewide who are participating in Pre-ETS through DVR.

Program Year 2019 Targets:

a. 90% of high schools statewide will have at least one student participating in Pre-ETS through DVR. b. 20% of potentially eligible students will participate in Pre-ETS through DVR.

8. DVR will implement the following strategies to mitigate FFY 2016 and FFY 2017 reductions in re-allotment funding that resulted in substantial cuts in services and capacity:

- Partnerships with other programs and state systems to sustain employment services for people with disabilities;
- Increasing program income through the Ticket to Work program;
- Exploring federal and state grant opportunities to pilot new service models;
- Continually assessing the assignment of DVR resources to ensure funds are going toward activities that are most likely to result in an employment and career outcome.

Program Year 2019 Measures:

a. State government or other community agencies that have contributed resources to sustain programs affected by the loss of re-allotment. b. Social Security Administration Ticket to Work and Cost Reimbursement revenue. c. Federal or state grant applications.

Program Year 2019 Targets:

a. Baseline b. DVR will generate \$2.5 million in Ticket to Work Revenue in Program Year 2019. c. DVR will apply for at least one grant application in Program Year 2019.

9. With the implementation of Pre-ETS, the DVR caseload has trended towards serving a younger cohort. DVR needs to ensure the needs of middle-aged and mature workers are still adequately addressed, and in particular, the following cohorts:

- Adults ages 35 to 55
- Adults aged 55 and above

Program Year 2019 Measures:

a. The number of individuals receiving services in these cohorts. b. The employment outcomes by age cohort. c. Consumer satisfaction as measured in the DVR satisfaction survey. d. Services provided by age cohort. e. Other measures as identified by DVR and the SRC.

Program Year 2019 Target: DVR will be collecting baseline data for this reporting period.

10. DVR will continue to seek options for supported employment for the following under-served populations in the state:

a. Individuals with developmental disabilities who do not meeting the developmental services system eligibility criteria or system or care priorities; b. Individuals with TBI who need onsite support; c. Individuals with psychiatric disabilities who do not meet the Community Rehabilitation and Treatment eligibility criteria; and d. Individuals with other severe disabilities who need supported employment.

Program Year 2019 Measure: DVR will track and report the results of specific initiatives related to these populations. Program Year 2019 Target: Thirty individuals in the above categories will receive supported employment services.

11. DVR will improve the outcomes for students and youth with emotional/behavioral disabilities served through the JOBS Supported Employment Program.

Program Year 2019 Measure: Total number of consumers achieving a successful employment outcome (VR 26 closure).

Program Year 2019 Target: A total of 200 successful employment outcomes.

2. Identify the goals and priorities in carrying out the VR and Supported Employment programs.

See Goals 10 and 11 in Section (A)

3. Ensure that the goals and priorities are based on an analysis of the following areas:

The goals and priorities outlined in the prior sections were based on the DVR and SRC Needs Assessment as outlined in Section J. In addition, they were informed by the new Common Performance Measures. Finally, DVR and the SRC established goals and priorities related to Pre—Employment Transition Services.

A. The most recent comprehensive statewide assessment, including any updates;

The goals and priorities outlined in the prior sections were based on the 2017 DVR and SRC Needs Assessment as outlined in Section (j). In addition, they were informed by the new Common Performance Measures. Finally, DVR and the SRC established goals and priorities related to Pre-Employment Transition Services.

Based on the data gathered and discussions with the State Rehabilitation Council, DVR Senior and Regional Managers, and the DVR Implementation Team, the following are the key findings of the 2017 DVR Needs Assessment (not in priority order):

A. The need for increased attention to the employment needs of the mature worker. Despite a very modest increase, the overall percentage of VR consumers over 65 remains very low (3% in FFY 2016). This is despite the fact that Vermont has an aging demographic. Older Vermonters are increasingly staying in the workforce beyond normal retirement age for financial reasons or just because they want to. Many mature workers may experience age related disabilities and could benefit from DVR services. It is not clear why they are not seeking DVR services in greater numbers, and this is an area DVR may need to research in partnership with programs serving older Vermonters.

B. DVR needs to identify and implement strategies to increase consumer hourly wages at closure. In FFY 16 55% of individuals were closed earning less than 110% of minimum wage. While this can partly be explained by the concurrent increases in the state minimum wage in 2015 and 2016, it is still an area of concern. The minimum wage in Vermont was \$9.60 in 2016. This compares

to a median hourly wage for all occupations in Vermont of \$18.23 for 2016. While entry level employment is appropriate for some consumers, DVR should be looking at ways for individuals to move up the career ladder into higher wage employment.

C. DVR consumers need opportunities to gain industry recognized credentials in middle skills professions. DVR data suggests that consumers who gain industry recognized certifications such as Licensed Nursing Assistant (LNA) or Commercial Driver's License (CDL), are closed in higher wage employment. Such middle skill certifications are often the quickest way to help individuals move from entry level employment to higher paying employment with genuine career prospects. There is a high demand from employers for individuals with these types of certifications. Historically, DVR has set aside case service funds to support consumers in certification programs. DVR may need to expand these set asides and look at more system wide efforts to make these opportunities available.

D. The implementation of Pre-ETS has shifted the DVR caseload to serve a higher proportion of younger people.

The implementation of Pre-ETS appears to have had the effect of skewing the entire VR caseload towards a younger age group. This is in part because VR also added Young Adult counselors to meet the needs of students who engaged with VR as high school students and needed to transition into the adult caseload. DVR may need to consider new ways of providing services to younger people that matches their specific interests and needs. DVR may also need to pay attention to the needs of adults 35 and older. The number of adults age 35 to 55 has dropped significantly since the implementation of Pre-ETS. While this change in the overall caseload is predictable, DVR should be careful not to overlook the needs of this age group.

E. The loss of re-allotment funding requires DVR to plan and manage services with reduced resources. As previously noted, the loss in re-allotment funds resulted in significant cuts to the DVR program in FFY 17. DVR has managed those reductions while retaining the core services of the program. Going forward DVR will develop and implement strategies to offset this loss through:

- Partnerships with other programs and state systems to sustain employment services for people with disabilities;
- Increasing program income through Ticket to Work and other opportunities;
- Looking for federal and state grant opportunities to pilot new service models.

DVR will also need to continually assess the assignment of resources and their impact on consumer services and outcomes. With limited resources it is especially important DVR invest funds in activities that are most likely to result in high quality employment outcomes.

F. DVR must develop strategies to meet and exceed the outcome targets under the Common Performance Measures.

The WIOA Common Performance Measures significantly change the way DVR is measured. The emphasis on career development, credential attainment, and measurable skills gains, will require DVR to consider changing current practice. As previously noted, DVR will be looking at strategies to increase wages and assist consumers in obtaining industry recognized credentials. In addition DVR will look at how to help consumers develop a career path.

G. DVR should consider developing job coach capacity for adults and youth with severe disabilities who are not eligible for existing supported employment programs.

DVR has recognized for many years that there are consumers with significant disabilities who require on job support to maintain employment, but who are not eligible for existing supported employment programs, like CRT or Developmental Services. These include individuals with TBI, psychiatric disabilities, developmental disabilities, and individuals with multiple disabilities. Field staff have recently experimented with hiring job coaches directly as temporary state employees, instead of contracting out for the service. This approach has proved more flexible and responsive to consumer needs. It also may be more cost effective.

H. The need for sector-based training and collaboration with technical centers.

Training programs, particularly for youth who are not planning to go to college, are inconsistently available across the state. Technical Centers connected to high schools sometimes offer adult training and some have been willing to work with employers to develop sector-based training programs. A more systematic approach to training would ensure that employers are able to hire skilled workers for available positions within their companies.

I. The need for a comprehensive quality assurance system incorporating the new AWARE case management system .

VR would like to develop a quality assurance system that will ensure a cycle of continuous improvement. VR is part of a New England effort to develop such a system. The system would organize and align a state's organizational goals and objectives; performance measures; program evaluation; data analysis; and dissemination and communication strategies. In September 2017 DVR went live with an electronic case management system, called AWARE. Aware is a powerful tool that is capable of producing data that managers and staff can use to inform practice and support quality work. DVR is still in the process of understanding how Aware works and how best to use it. DVR is a data driven organization and AWARE significantly upgrades our capacity to use data effectively.

B. the State's performance under the performance accountability measures of section 116 of WIOA; and

As with all states, Vermont began collecting and reporting data for the WIOA Common Performance Measures in program year 2018. Program years 2018 and 2019 will be baseline data collection periods before targets are set for 2020. As noted, a major goal and priority for DVR will be realigning services to meet the WIOA measures. DVR has outlined our strategic approach to meet this priority area in Section (o).

C. other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

Not applicable.

m. Order of Selection

Describe:

1. Whether the designated State unit will implement and order of selection. If so, describe:

A. The order to be followed in selecting eligible individuals to be provided VR services.

Vermont continues to operate under the order of selection established in FFY 1999. With the approval of the State Rehabilitation Council, the Category definitions have been rewritten in FFY 2017 to clarify the intent of the Rehabilitation Act to serve those most in need of services. These Category definitions replace the definitions that were in the FFY 2015 State Plan.

Category 1: Individuals who have been determined by DVR to have a physical or mental impairment that constitutes or results in a substantial impediment to employment and that seriously limits function in four or more areas of functional capacity (mobility, communication, work tolerance, work skills, self-care, self-direction, interpersonal skills, dexterity/coordination), requiring multiple services over a period of six months or more.

Category 2: Individuals who have been determined by DVR to have a physical or mental impairment that constitutes or results in a substantial impediment to employment and that seriously limits function in two to three areas of functional capacity (mobility, communication, work tolerance, work skills, self-care, self-direction, interpersonal skills, dexterity/coordination), requiring multiple services over a period of six months or more.

Category 3: Individuals who have been determined by DVR to have a physical or mental impairment that constitutes or results in a substantial impediment to employment and that seriously limits function in one area of functional capacity (mobility, communication, work tolerance, work skills, self-care, self-direction, interpersonal skills, dexterity/coordination), requiring multiple services over a period of six months or more.

Category 4: Individuals who have been determined by DVR to have a physical or mental impairment that constitutes or results in a substantial impediment to employment and that seriously limits function in one area of functional capacity (mobility, communication, work tolerance, work skills, self-care, self-direction, interpersonal skills, dexterity/coordination), requiring multiple services over a period of less than six months.

B. The justification for the order.

DVR made the changes to the definitions of Categories 1, 2, 3 and 4 because the old definitions did not provide sufficient clarity for counselors. As a result, a high proportion of eligible individuals were found to be eligible under Category 1. Based on data from the last eighteen months, it is clear the new Categories are better at identifying individuals with the most severe disabilities. With the loss of re-allotment funding DVR has considered closing one or more of the current open categories. However, two factors have enabled DVR to maintain Categories 1, 2 and 3 in an open status. First, DVR has been very successful in generating program income through the Ticket to Work program. In calendar year 2017, DVR received \$2.5 million in Ticket payments. This income has helped offset the loss of re-allotment. Second, DVR's strong partnerships with other state agencies allowed for those agencies to pick up funding for some programs that DVR had funded. Specifically, the Department of Mental Health agreed to fund a peer directed supported employment program for individuals with psychiatric disabilities. Also, the Alcohol and Substance Abuse Division funded employment services housed in peer run recovery centers. These partnerships enabled DVR to focus resources on core VR services.

C. The service and outcome goals.

For FFY 18, DVR expects to serve the following number of individuals in each category:

- Category 1: 5,806
- Category 2: 2,021
- Category 3: 299

DVR projects the following rehabilitation outcomes for the individuals found eligible under the Order of Selection. These are the projected outcomes over the lifetime of the above cases:

- Category 1: 3,193
- Category 2: 1,111
- Category 3: 165

D. The time within which these goals may be achieved for individuals in each priority category within the order.

Individuals found eligible under Categories 1, 2 and 3 are expected to require at least six months of services from the development of the plan to the achievement of the employment goal. The actual amount of time needed will vary widely depending on the goals and needs of the individual. On average in Vermont it takes 13 months from application to successful employment outcome for individuals in the above Categories. Individuals found eligible under Category 4 will be expected to achieve their employment goal within six months of plan development. However, these individuals will have to wait one or more quarters for the Order of Selection to be opened (if it is opened), before a plan can be developed. Therefore, assuming one quarter for the Order of Selection to be opened and up to 90 days for plan development, outcomes for individuals under this category may take up to one year or more.

E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

In Vermont services for Category 1 eligible individuals are never delayed (as long as they are available for services), when eligible individuals in Priority Categories 2, 3 or 4 are open for services. This assumes all other variables are equal such as application date, IPE date and the individual's availability for services at any given time.

2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.

Vermont DVR has elected to serve eligible individuals, regardless of the order of selection, who require specific services or equipment to maintain employment.

n. Goals and Plans for Distribution of title VI Funds.

1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.

At the time of this writing, Title VI-B funds have not been appropriated for FFY 2018. DVR has \$200,000 in VI-B carry over funds from the FFY 17 award. These funds will be directed to the JOBS supported employment program serving youth ages 16 to 22.

2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:

A. the provision of extended services for a period not to exceed 4 years; and

DVR has committed VI—B funding for youth to the JOBS program, because that program is specifically designed to serve eligible youth with the most severe disabilities. A description of the JOBS program is outlined in other sections of the plan.

DVR counselors will authorize the use of funds for extended services through the JOBS program for up to the maximum of four years.

B. how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

As noted in Section (F), DVR has a partnership with the Department of Mental Health (DMH) to provide extended services for youth and adults with psychiatric disabilities. The JOBS program uses Medicaid Global Commitment funds to provide extended supports post DVR closure. In addition, the adult mental health program can provide ongoing supports through the Medicaid case rate for individuals eligible for the Community Rehabilitation and Treatment (CRT) program or outpatient Medicaid Case Management services. Also as noted in Section (F), DVR has a partnership with the Vermont Development Disabilities Services Division (DDSD) to provide extended services for individuals with developmental disabilities. The primary source of funding for extended services for individuals with developmental disabilities is Home and Community Based Medicaid Waiver funds.

o. State's Strategies

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. The methods to be used to expand and improve services to individuals with disabilities.

In Section (I) of the State Plan, DVR outlined its goals and priorities for Program Year 2019. The eleven strategic goals established by DVR and the SRC are as follows:

- A. DVR will align services to support consumers in achieving the WIOA Common Performance Outcomes Measures;
- B. DVR will increase the percentage of consumer earnings over 110% of minimum wage and 150% of minimum wage at closure. DVR believes a major lead indicator of median earnings six months post closure are earnings at closure. Based on Needs Assessment data from 2017, 55% of DVR consumers were earning 110% of minimum wage or less at closure and only 18% of DVR consumers were earning over 150% of minimum wage at closure;
- C. DVR will increase consumer opportunities to participate in and gain industry-recognized credentials in middle skills professions. Industry-recognized credentials are a proven mechanism for consumers to access higher wage employment. This will include sector-based training programs in collaboration with technical centers;
- D. DVR will continue to expand efforts to effectively serve employers through Creative Workforce Solutions (CWS). Employer engagement continues to be a critical activity to ensure DVR consumers have access to employment opportunities;
- E. Consumer satisfaction with DVR services will be maintained or increase;
- F. DVR will implement a comprehensive quality assurance process incorporating the new AWARE case management system. In 2017 DVR successfully implemented the AWARE case management system. This system will provide DVR with a powerful new tool to upgrade the quality assurance process.
- G. DVR will continue to implement highly effective Pre-Employment Transition Services (Pre-ETS) for students statewide.
- H. DVR will implement the following strategies to mitigate FFY 2016 and FFY 2017 reductions in re-allotment funding that resulted substantial cuts in services and capacity:
 - Partnerships with other programs and state systems to sustain employment services for people with disabilities;
 - Increasing program income through the Ticket to Work program;
 - Exploring federal and state grant opportunities to pilot new service models; and
 - Continually assessing the assignment of DVR resources to ensure funds are going toward activities that are most likely to result in an employment and career outcome.
- I. With the implementation of Pre-ETS, the DVR caseload has trended towards serving a younger cohort. DVR needs to ensure the needs of middle-aged and mature workers are still adequately addressed, and in particular, the following cohorts:
 - Adults ages 35 to 55
 - Adults aged 55 and above
- J. DVR will continue to seek options for supported employment for the following underserved populations in the state:
 - Individuals with developmental disabilities who do not meet the developmental services system eligibility criteria or system or care priorities;
 - Individuals with TBI who need onsite support;
 - Individuals with psychiatric disabilities who do not meet the Community Rehabilitation and Treatment eligibility criteria; and
 - Individuals with other severe disabilities who need supported employment
- K. DVR will improve the outcomes for students and youth with emotional/behavioral disabilities served through the JOBS Supported Employment Programs

The following are the strategies that will be implemented by Vermont DVR to achieve one or more of the goals and priorities. Each strategy is linked to the goals and priorities it is intended to address.

Strategy 1: DVR will implement a portfolio of projects designed to realign staff practices, services and assignment of resources to meet the WIOA. Goals 1, 2, 3, 4 and 8. DVR has identified a portfolio of twelve domains the Division will focus on to maximize DVR outcomes under the WIOA Common Performance Measures. These strategy areas of focus will be developed into projects during Program Year 2019. The areas of focus are:

- DVR allocation of resources reflects the program qualitative measures.

- Every step of the rehabilitation process will message and support the DVR commitment to careers.
- DVR casework practices will support serving consumers more than once on their journey. DVR will create a system to reach out to closed cases. DVR consumers will be encouraged to have a short term and long term vocational goal.
- DVR Counselors will provide long term aspirational career counseling. All staff will be trained to support long term career goals.

- Motivational Interviewing (MI) coaches will facilitate coaching circles that support career counseling using MI strategies.
- All DVR staff will be trained to do vocational assessments and use assessments as a career planning tool.
- A continuum of Progressive Education (parallel to Progressive Employment) will be developed and implemented.
- An education and training matrix will be completed in each district, including a gap analysis.
- All staff will be familiar with education and training providers in their communities, as well as what career pathways and stackable credentials are offered. Counselors will be able to speak to consumers about possible career paths, based on assessments.
- BAMs (Business Account Managers) understand the career paths in the businesses they serve.
- AWARE will support the Careers Initiative.
- A new “dashboard” using “leading” measures will be created that reflects the Common Performance Measures.

Strategy 2: Expand training opportunities in industry recognized certifications that result in higher wage job opportunities for DVR consumers. Goals 1, 2, 3 and 5. Since 2015, DVR has set aside funds to specifically support consumers’ access to training for industry recognized certifications in high demand and higher wage fields. Data suggests consumers who participate in these trainings exit the program with higher wage jobs. Also, the skills and qualifications consumers achieve are meeting the demands of local employers. Therefore, DVR plans to improve and expand these opportunities as follows:

- DVR will maintain and expand the funds set aside for industry recognized trainings and certifications with an emphasis on middle and higher skill jobs in high demand sectors.
- DVR will develop partnerships with employers, the Vermont Department of Labor, local Workforce Investment boards and the technical centers, to expand the number and type of training opportunities available.
- DVR will track consumer participation and outcomes to determine which training programs are the most effective in terms of higher wages and career growth.

Strategy 3: Implement a comprehensive quality assurance system utilizing the AWARE case management system. Goals 4, 5, 6 and 7.

In September 2017, DVR went live with the AWARE case management system. AWARE greatly increases DVR’s capacity to manage and assess the quality of services. This includes:

- An adaptable quality assurance tool built into the AWARE system.
- The Power BI tool to analyze AWARE data in greater depth.
- The ability to develop “dashboards” of leading quality indicators to measure staff and program performance. DVR will develop a QA system that does not simply measure compliance but actually looks at the total picture including the quality and effectiveness of services provided. This will also look at which practices are resulting in positive outcomes and if the assignment of time and resources are being deployed effectively.

Strategy 4: Coordinate efforts with the Agency of Education (AOE) and the Department of Labor (VDOL) to ensure individuals with disabilities have access to other components of the workforce system. Goals 1, 2, 3, and 8. As noted in the Unified Section of the plan, DVR will be working closely with VDOL and AOE to ensure DVR consumers have access to all the workforce development opportunities available in their communities. DVR will be implementing a number of strategies to make this happen including the following:

- The development of joint training programs in high demand and high wage sectors.
- Developing systems to promote co-enrollment across programs to support consumer employment goals.
- Actual or virtual co-location of DVR and VDOL staff. Cross training of VDOL, DVR and AOE staff.

Strategy 5: Continue to implement and improve Pre-Employment Transition Services (PETS) for students. Goals 1, 3, 5 and 7. Vermont DVR has developed a comprehensive strategy to implement Pre-ETS in the state. Implementation started in the spring of 2015, and now Pre-ETS are fully operationalized. The following are the primary activities:

Vermont DVR has implemented an in school Transition Counselor model providing Pre-ETS services. DVR has reassigned 20% of the program’s VR counseling capacity (13.5 FTEs) to work exclusively with students. This provides coverage to all 60 supervisory unions and high schools in the state.

DVR has worked with its primary CRP, VABIR, to implement the Youth Employment Specialist (YES) model. A full time YES will be paired with each in school VR counselor to provide a range of Pre-ETS services including the development of real work based learning experiences.

DVR has implemented self-advocacy services for students through a contract agreement with the Vermont Center for Independent Living (VCIL). DVR has been successful in establishing a high quality Pre-ETS program accessible to students statewide.

In addition, DVR will use the Linking Learning to Careers (LLC) project funded through the RSA Work Based Learning demonstration, to explore innovative new practices. The LLC project is an experimental design demonstration that will test the following innovations:

- The provision of Career Consultation services.
- Graduated work based learning experiences including competitive employment.
- Dual enrollment in post-secondary programs for high school students.
- Youth assistive technology services.
- Assistance with transportation.

We believe the LLC demonstration will provide rich information for Vermont and other states around how to provide Pre-ETS services.

Strategy 6: Expand employer outreach and engagement efforts through Creative Workforce Solutions (CWS) to effectively meet the needs of employers. Goal 4. As described in Section (g) of the State Plan, CWS is the primary employer

outreach and engagement infrastructure for DVR. CWS, and in particular the Business Account Managers, have been a very effective approach to engaging employers and developing employment opportunities for DVR consumers. DVR will expand these efforts through the following strategies:

- Seek opportunities to coordinate employer engagement with the Vermont Department of Labor.
- Analyze Salesforce account management data to determine if there are industry sectors that are underrepresented. Develop strategies to engage those sectors in partnership with local employers.
- Build on and expand employer events such as Job Fairs, employer breakfasts and business recognition events designed to engage employers.

Strategy 7: Explore and expand strategies to serve and support the older worker with disabilities. Goal 5 and 9. In FFY 17 the proportion of DVR participants over 55 increased to 18%, an increase of 5% over the past four years. In response, DVR has created a Mature Worker Program Director. This position will work with the DVR management team to explore strategies to engage and serve mature workers. This may include:

- Expanding partnerships with community agencies already serving the older worker such as Vermont Associates.
- Training employment staff such as the Business Account Managers and Employment Consultants on how to represent older workers.
- Effective use of Assistive Technology to assist and encourage aging workers to remain in the workforce.

Strategy 8: Explore strategies to assist DVR consumers retain and advance in employment. Goal 1, 5, and 8. DVR recognizes one of the goals of WIOA is to help consumers retain employment and develop career pathways to higher wage employment. The DVR management team had a two-day retreat to consider strategies to achieve this goal. One of those approaches is to engage consumers post closure to determine if they could benefit from additional services to help them advance in their current employment. This might include:

- Exploring the use of post-employment services to support DVR consumers advancing in their current employment or accessing a new higher wage job.
- Exploring outreach to closed cases to determine if individuals could benefit from re-engagement with DVR.

Strategy 9: DVR will continue to seek funding partnerships with state agencies and community agencies to expand access to supported employment for individuals with the most severe disabilities, who are not currently eligible for long term support through existing systems. Goal 10. DVR will continue to seek opportunities to expand supported employment access to individuals through the following strategies:

- Partnerships with other state and community agencies to fund long term supports.
- Innovative use of existing long term services to support employment.
- Development of natural support models.

Strategy 10: DVR will partner with DMH to promote the Individual Placement and Support (IPS) model within the JOBS supported employment program. Goal 11. The IPS model is an evidence-based approach to providing supported employment services for adults with psychiatric disabilities. There is increasing evidence this approach is effective across populations including youth with severe emotional disturbance. DVR and DMH plan to support the implementation of IPS within the JOBS supported employment programs.

2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.

The State Assistive Technology Program is managed within the DVR program. The AT Project Director sits on the senior management team of the DVR program to make sure AT services are well integrated into VR services statewide. DVR provides VR funds to the AT Project through a contract to provide AT assessment and consultation services for VR consumers statewide. These contract funds support three AT Specialists located around the state. In addition, DVR contracts with the AT project to provide two AT coaches to work specifically with youth. DVR has established a set aside to fund higher cost AT equipment purchases. The AT staff provide guidance to VR counselors around the selection and purchase of AT equipment.

3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.

Most of the minorities living in VT reside within Chittenden County, served by the Burlington district office. In particular, Burlington has a high proportion of refugees and new Americans. There are several organizations within Burlington that serve individuals who are minorities and/or refugees. The Burlington VR office has a well-established relationship with the Vermont Refugee Resettlement program and the Association of Africans Living in Vermont.

4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).

Part of DVR's overall strategic plan, as noted in Section 1, is to continue implementing highly effective Pre-Employment Transition Services (Pre-ETS) for students statewide. Vermont DVR has developed a comprehensive strategy to implement Pre-ETS in the state. Implementation started in the spring of 2015, and now Pre-ETS are fully operationalized. The following are the primary activities. A. DVR has implemented an in school Transition Counselor model providing PETS services. DVR has reassigned 20% of the programs VR counseling capacity (13.5 FTEs) to work exclusively with students. This provides coverage to all 60 supervisory unions and high schools in the state.

B. DVR has worked with its primary CRP, VABIR, to implement the Youth Employment Specialist (YES) model. A full time YES will be paired with each in school VR counselor to provide a range of PETS services including the development of real work based learning experiences.

C. DVR has implemented self-advocacy services for students through a contract agreement the Vermont Center for Independent Living (VCIL). DVR has been successful in establishing a high quality Pre-ETS program accessible to students statewide. In addition, DVR will use the Linking Learning to Careers (LLC) project funded through the RSA Work Based Learning demonstration, to explore innovative new practices. The LLC project is an experimental design demonstration that will test the following innovations:

- The provision of Career Consultation services
- Graduated work based learning experiences including competitive employment
- Dual enrollment in post-secondary programs for high school students
- Youth assistive technology services
- Assistance with transportation

We believe the LLC demonstration will provide rich information for Vermont and other states around how to provide Pre-ETS services.

5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

A major challenge for the Community Rehabilitation and supported employment programs is high staff turnover and staff training. To help address this issue DVR has partnered with Community College of Vermont to create an online Community Employment Specialist certification. The program meets the requirements for ACRE certification. The program was fully implemented in FFY 2017, and has been well accepted by provider agencies from supported employment programs and other CRPs. Staff appreciate the ability to get an ACRE certification.

6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

As noted in Section 1, one of DVR's strategies is to implement a portfolio of projects designed to realign staff practices, services and assignment of resources to meet the WIOA. DVR has identified a portfolio of twelve domains the Division will focus on to maximize DVR outcomes under the WIOA Common Performance Measures. These strategy areas of focus will be developed into projects during Program Year 2019. The areas of focus are:

1. DVR Allocation of resources reflects the program qualitative measures.
2. Every step of the rehabilitation process will message and support the DVR commitment to careers.
3. DVR casework practices will support serving consumers more than once on their journey. DVR will have a system to reach out to closed cases will be in place. DVR consumers will be encouraged to have a short term and long term vocational goal.
4. DVR Counselors will provide long term aspirational career counseling. All staff will be trained to support long term career goals.
5. Motivational Interviewing (MI) coaches will facilitate coaching circles that support career counseling using MI strategies.
6. All DVR staff are trained to do vocational assessments and use assessments as a career planning tool.
7. A continuum of Progressive Education (parallel to Progressive Employment) will be developed and implemented.
8. An education and training matrix will be done in each district, including a gap analysis.
9. All staff will be familiar with education and training providers in their community and what career pathways they offer as well as stackable credentials. Counselors will be able to speak to customers, based on assessments, about possible career paths.
10. BAMS understand the career paths in the businesses they serve.
11. AWARE will support the Careers Initiative.
12. A new dashboard will be created that reflects the Common Performance Measures — using "leading" measures.

7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

As noted in this section, one of DVR's strategies is to coordinate efforts with the Agency of Education (AOE) and the Department of Labor (VDOL), to ensure individuals with disabilities have access to other components of the workforce system. As noted in the Unified Section of the plan, DVR will be working closely with VDOL and AOE to ensure DVR consumers have access to all the workforce development opportunities available in their communities. DVR will be implementing a number of strategies to make this happen including the following:

- The development of joint training programs in high demand and high wage sectors
- Developing systems to promote co—enrollment across programs to support consumer employment goals
- Actual or virtual co—location of DVR and VDOL staff D
- Cross training of VDOL, DVR and AOE staff

8. How the agency's strategies will be used to:

A. achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

As noted earlier in this section, each strategy is linked back to at least one goal and priority established by VR and the SRC consistent with the Needs Assessment.

B. support innovation and expansion activities; and

The strategies for innovation and expansion have been laid out in Section I.

C. overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

As noted in Section 1, one of DVR's strategies is to continue to seek funding partnerships with state agencies to expand access to supported employment for individuals with the most severe disabilities, who are not currently eligible for long term support through existing systems. DVR will continue to seek opportunities to expand supported employment access to individuals through the following strategies:

- Partnerships with other state and community agencies to fund long term supports
- Innovative use of existing long-term services to support employment
- Development of natural support models

p. Evaluation and Reports of Progress: VR and Supported Employment Goals

Describe:

1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals.

FFY 2017 Goals and Priorities as outlined in the state plan:

Goal 1: DVR will implement highly effective Pre—Employment Transition Services (PETS) for students statewide.

FFY 2017 Measures:

- a. The percentage of high schools statewide that have at least one student actively participating in PETS through DVR.
- b. The percentage of all potentially eligible students statewide who are participating in PETS through DVR. FFY 2017

Targets: a. 90% of high schools statewide will have at least one student participating in PETS through DVR.

Program Year 2017 results: 100% of the public high schools in Vermont have made referrals to DVR for Pre-ETS services.

DVR has just started to implement PETS in a comprehensive and strategic manner in FFY 16. We intend to use FFY 16 and FFY 17 to establish baseline data on the percentage of the total potentially eligible population participating in PETS. Program Year 2017 results: During the 2016/17 school year 1,019 students with disabilities were enrolled in Pre-ETS and/or VR services out of a potentially eligible population of 5,390. This means 18.9% of potentially eligible students were receiving Pre-ETS and/or VR services during the school year. DVR believes that our comprehensive strategic approach to implementing Pre-ETS statewide has contributed to this success. In particular, the designation of 13.5 VR Transition Counselors and 13.5 contracted Youth Employment Specialists. This allowed DVR to have a presence in every school with a single point of contact. Factors that continue to impede implementation include:

- Lack of engagement from education staff in some high schools
- The challenges involved in serving the most rural and remote schools

Goal 2. DVR will align services to support consumers in achieving the WIOA Common Performance Outcomes Measures.

FFY 2017 Measures: a. Employment retention six months and twelve months post closure b. Median earnings six months post closure c. Credential attainment rate d. Measurable skills gains e. Employer engagement

FFY 2017 Targets: The targets are entered in the Common Performance Measures section of the unified plan.

Program Year 2017 Results: 2017 is a benchmark year for data collection under the Common Performance Measures.

Goal 3. In addition to the Common Performance Measures, DVR will continue to assist more Vermonters with a disability achieve an employment outcome.

FFY 2017 Measure: The number of individuals who achieve an employment outcome (status 26).

FFY 2017 Target: More individuals will achieve an employment outcome in FY 2017 than did in FY 2016 FFY 17 Results:

In FFY 2017 1,287 DVR consumers achieved an employment outcome. This is compared to 1,574 consumers who achieved an employment outcome in FFY 16. DVR believes there are two major factors that impeded the program achieving this goal. First, the loss of re-allotment funds dramatically decreased staff and case service resources. For example, DVR had to reassign or not fill ten DVR counselor positions. This has clearly had an impact on outcomes. Secondly, the shift of resources to Pre-ETS has clearly affected employment outcomes. While DVR supports the goal of Pre-ETS, there was no way to manage the re-assignment of 15% of federal funds to Pre-ETS without a drop in outcomes.

Goal 4. DVR will effectively serve employers through Creative Workforce Solutions (CWS).

FFY 2017 Measure: Employer engagement with DVR as tracked through the CWS Salesforce account management system.

FFY 2017 Target: DVR will maintain active relationships with 2,500 employers statewide during the fiscal year.

FFY 17 Results: In FFY 2017, DVR had 2,013 active relationships with employers statewide. Strategies that contributed to the achievement of this goal included: • The maintenance of the Business Account Manager (BAM) Capacity statewide. Despite loss of re-allotment, DVR has maintained 10 BAM positions statewide, a reduction of two positions. Two BAMs are covering two of the twelve DVR districts. • DVR has invested in the training and development of the BAM staff to improve their effectiveness. Factors that impeded the implementation of the goal: • The loss of two FTE BAM staff naturally had an impact on the employer outreach overall numbers.

Goal 5. Consumer satisfaction with DVR services will be maintained or increase.

FFY 2017 Measure: Bi-annual consumer satisfaction survey.

2017 Target: DVR will achieve an 86% or better overall consumer satisfaction rating. Consumers reported an 83% overall satisfaction rating in the most recent survey (2013).

FFY 16 Results: In the spring of 2016, DVR repeated the consumer satisfaction survey conducted by an independent contractor. 87% of DVR consumers reported they were satisfied or very satisfied with DVR services. Strategies that contributed to the achievement of this goal: After the 2013 satisfaction survey results became available, DVR managers met with the survey contractor to look at the underlying data. We found two underlying issues: • Differences in expectations between DVR consumers and what the DVR program could actually provide. • Consumer concerns about staff response times to phone calls and E mails. In response to the above DVR redesigned its approach to orientation to set clearer expectations about the DVR program. DVR also implemented new expectations about response times for consumer contacts.

Goal 6. DVR will implement the Alliance Enterprises AWARE electronic case management system to support staff in providing high quality VR services.

FFY 2017 Measure: Staff satisfaction with the AWARE Implementation

FFY 2017 Targets:

- a. More than 70% of staff will report they are satisfied or very satisfied with the implementation of the AWARE case management system three months post operationalization.
- b. More than 90% of Staff will report they are satisfied or very satisfied with the AWARE system one year after implementation (twelve months post go live).

FFY 2017 Results: DVR went live with AWARE in September 2017. Based on field feedback, the system has been overwhelmingly accepted by front line staff. Staff are very happy to finally have a modern case management system. DVR is currently conducting a survey of all staff. We expect the results to be available in May.

Goal 7. DVR staff will be satisfied with their jobs and have the training, tools and support they need to be effective.

FFY 2017 Measure: Bi-annual Staff Survey a. Overall staff satisfaction b. Staff response to the question "Do you have the information you need to do your job?" c. Staff response to the question "Do you have adequate training to do your job?"

FFY 2017 Targets: a. More than 90% of staff will report they are satisfied or very satisfied with their jobs. b. More than 85% of staff will report they have the information they need to do their jobs. c. More than 80% of staff will report they had adequate training to do their jobs. FFY 2017

Results: DVR did not conduct a staff satisfaction survey in 2017. This was because DVR was going through a major restructuring and downsizing. DVR determined it was inappropriate to conduct a satisfaction survey during such a period of change and uncertainty.

Goal 8. DVR will continue to seek funding for services for the following under served populations in the state:

- a. Individuals with measured IQs between 70 and 80
- b. Individuals with TBI
- c. Individuals with psychiatric disabilities
- d. Individuals with other significant disabilities who require case management services
- e. Individuals exiting the correctional system
- f. Individuals with alcohol/substance abuse dependence/abuse disorders (AODA)
- g. Individuals with disabilities who are veterans
- h. Individuals with disabilities who are not primary English speakers
- i. Individuals age 65 and older

FFY 2017 Measures: DVR will track and report the results of specific initiatives related to these populations. FFY 2017 Targets: None

FFY 2017 Results: In FFY 2016 DVR implemented one pilot to serve under served populations. These were as follows: Three pilots with peer run "Recovery Centers" serving adults with substance abuse disorders. The goal was to embed employment staff in the centers. Because of the loss of re-allotment funds DVR had to discontinue the pilot. However, the Vermont Office of Alcohol and Drug Abuse Programs has agreed to step in and fund this service.

B. Describe the factors that impeded the achievement of the goals and priorities.

Described in section A where applicable

2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals.

Goal 9. DVR will improve the outcomes for supported employment programs serving adults with developmental disabilities. This includes students served under Pre-Employment Transition Services. 2017 Measures:

- a. Total number of consumers achieving a successful employment outcome (VR 26 closure).
- b. Total number of people employed within the Developmental Services Program.

FFY 2017 Targets

- a. Total successful employment outcomes: 250
- b. Total number of people employed within the DDS system: 1,150

FFY 2017 Results: Total successful employment outcomes: The implementation of AWARE in FFY 2017 has interrupted DVR capacity to report on these measures. The data crosses the legacy system and AWARE making it very difficult to generate these data accurately. DVR expects to be able to generate these reports going forward in the AWARE system.

In state fiscal year 2017 a total of 1,256 individuals with developmental disabilities were employed in the DDS system. This is about 48% of the working age population.

Goal 10. DVR will improve the outcomes for students and youth with emotional/behavioral disabilities served through the JOBS Supported Employment Programs.

The implementation of AWARE in FFY 2017 has interrupted DVR capacity to report on these measures. The data crosses the legacy system and AWARE making it very difficult to generate these data accurately. DVR expects to be able to generate these reports going forward in the AWARE system.

B. Describe the factors that impeded the achievement of the goals and priorities.

The loss of re-allotment funding has required DVR to reduce funding to the developmental services supported employment programs by about 30% and the JOBS supported employment programs by about 40%. Such significant reductions have had an impact on the programs capacity.

3. The VR program's performance on the performance accountability indicators under section 116 of WIOA.

As noted, the Common Performance Measures went into effect July 1, 2017 and DVR is currently collecting baseline data.

4. How the funds reserved for innovation and expansion (I&E) activities were utilized.

In the past year expansion activities have been limited because the DVR program is still adjusting to the loss of re-allotment funding. The focus of DVR efforts have been on planning how to shift program services and practices to meet the WIOA Common Performance Measures. DVR has contracted with an organizational development consultant to work with the VR management team and the SRC to implement of systems change effort. This includes implementing multiple special projects to realign services to the new measures.

q. Quality, Scope, and Extent of Supported Employment Services.

Include the following:

1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.

Individuals with Developmental Disabilities DVR works closely with the Developmental Disabilities Services Division (DDSD) to provide supported employment services and DVR funds are viewed, along with Medicaid funds, as an integral part of the overall employment budget for individuals with developmental disabilities. This funding braids DVR funding with individual Medicaid Waiver funds to create a seamless structure of upfront and ongoing support. DVR funds are specifically allocated to provide assessment, training, and placement services until closure, with Medicaid Waiver funds providing the necessary long term follow up. DVR and DDSD only support individual integrated competitive supported employment. The State does not support any sheltered work or congregate work settings. The most recent employment rate data for individuals with developmental disabilities (SFY16) showed a 48% employment rate for working age adults in the DDSD system. DVR and DDSD have no sheltered employment workshops since Vermont closed its last workshop for individuals with developmental disabilities in 2002. That same year, Vermont was ranked number 1 in the nation in the number of people with developmental disabilities who received supported employment to work per 100,000 of the state population¹. In the past two years, the numbers of individuals with developmental disabilities employed in competitive jobs have continued to increase.

¹ The State of the States in Developmental Disabilities: 2002 Study Summary, Coleman Institute for Cognitive Disabilities & Department of Psychiatry, University of Colorado, January 2004.

Adults with Significant Mental Illness DVR has historically worked closely with DMH to support the integration of employment into the broad array of clinical mental health services available to individuals with significant mental health issues. Similar to its relationship with DDSD, DVR funding was braided with the DMH Community Rehabilitation and Treatment (CRT) Medicaid case rate to provide a seamless structure of upfront and ongoing support. Up until SFY 2016, DVR funds have been specifically allocated to provide assessment, training, and placement services until closure, with the CRT Medicaid case rate funds providing the necessary long term follow up. Starting in SFY 16, DVR decided to reallocate the \$700,000 in Title 110 funds committed to adult mental health to the JOBS program. This decision was made to enable DVR to come into compliance with the Pre-Employment Transition Services (Pre-ETS) requirement. In order to meet the 15% Pre-ETS expenditure target, DVR had to reassign funds from adult services to services for students and youth. This was a very difficult decision for DVR and we are greatly saddened by the impact on supported employment services for adults with mental illness. While DVR no longer has a formal contractual program with the CRT programs to deliver supported employment services, DVR continues to partner with CRT programs at the local level. Many CRT programs have sustained their supported employment services despite the loss of VR funding. Local VR offices continue to provide services for CRT consumers that supplement their Medicaid funded services. DVR and DMH continue to work together at the state level, to support evidence based supported employment. Vermont was the first state to pilot a Johnson and Johnson Dartmouth initiative, now in 13 states, which continues to demonstrate that adherence to the principles of evidence based supported employment is key to increasing employment rates. Youth with Emotional and Behavioral Disturbances The JOBS Program is an innovative supported employment and intensive case management service for youth with emotional and behavioral disturbances (EBD) that uses work as a means to reach this challenging population. As a result of a unique partnership between the Department of Mental Health's Child, Adolescent and Family Unit (CAFU), the Department for Children and Families, the Department of Corrections, the Division of Vocational Rehabilitation, and contract agencies, the JOBS Program is operational in twelve (12) sites across the state. The JOBS Program is funded through a combination of Medicaid Global Commitment funds and a VR grant funds. JOBS involves employers and the business community in meeting the needs of youth through intensive job development, placement, and on and off site training support. JOBS differs from other traditional employment models by providing intensive case management services to assist young people in meeting other areas of need in their lives, e.g., dealing with legal issues, homelessness, drug/alcohol abuse, transportation and probation and parole. Within this model, DVR funds are used to provide the employment focus and upfront employment assessment, training, and placement services. The case management and ongoing support is provided through state general funds (contributed by the different state departments noted above) which are matched to Medicaid through a fee for service arrangement with DMH. Individuals with Traumatic Brain Injury DVR also works with the Developmental Disabilities Services Division (DDSD) to provide seamless employment support to individuals with Traumatic Brain Injury. Similar to the collaboration that serves individuals with developmental disabilities, the DVR funds are used for the up—front assessment, training, and placement services, while individual Medicaid waiver funds are used to provide the ongoing support.

2. The timing of transition to extended services.

Described in Section 1.

Certifications

Name of designated State agency or designated State unit, as appropriate **Vermont Agency of Human Services**

Name of designated State agency **Vermont Agency of Human Services**

Full Name of Authorized Representative: **Al Gobeille**

Title of Authorized Representative: **Secretary**

States must provide written and signed certifications that:

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA*, and its supplement under title VI of the Rehabilitation Act.** Yes
2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the **designated State agency listed above** agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes
3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan*, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;** Yes
4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes
5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes
6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes
7. The **Authorized Representative listed above** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; Yes
8. The **Authorized Representative listed above** has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes
9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement. Yes

Footnotes

Certification 1 Footnotes

* Public Law 113-128.

** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

Certification 2 Footnotes

* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

** No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

*** Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

Certification 3 Footnotes

* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes

Additional Comments on the Certifications from the State

Certification Regarding Lobbying — Vocational Rehabilitation

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization **Agency of Human Services Division of Vocational Rehabilitation**

Full Name of Authorized Representative: **Al Gobeille**

Title of Authorized Representative: **Secretary**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)

(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

Certification Regarding Lobbying – Supported Employment

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization **Agency of Human Services Division of Vocational Rehabilitation**

Full Name of Authorized Representative: **Al Gobeille**

Title of Authorized Representative: **Secretary**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)

(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>).

Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the

Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:**

1. Public Comment on Policies and Procedures:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. Administration of the VR services portion of the Unified or Combined State Plan:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

a. the establishment of the designated State agency and designated State unit, as required by section 101(a)(2) of the Rehabilitation Act.

b. the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.

The designated State agency or designated State unit, as applicable **(B) has established a State Rehabilitation Council**

c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.

d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).

e. the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.

The designated State agency allows for the local administration of VR funds **No**

f. the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.

The designated State agency allows for the shared funding and administration of joint programs: **No**

g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. **No**

h. the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.

i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act .

j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.

k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.

l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities.

m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.

4. Administration of the Provision of VR Services:

The designated State agency, or designated State unit, as appropriate, assures that it will:

a. comply with all requirements regarding information and referral services in accordance with sections 101(a)(5)(D) and (20) of the Rehabilitation Act.

b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act .

c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act?

Agency will provide the full range of services described above

d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.

- e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.
- f. comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.
- g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.
- h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act.
- i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs
- j. with respect to students with disabilities, the State,
 - i. has developed and will implement,
 - A. strategies to address the needs identified in the assessments; and
 - B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and
 - ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).

5. Program Administration for the Supported Employment Title VI Supplement:

- a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.
- b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.
- c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

6. Financial Administration of the Supported Employment Program:

- a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act.
- b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

7. Provision of Supported Employment Services:

- a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.
- b. The designated State agency assures that:
 - i. the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act
 - ii. an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.

Additional Comments on the Assurances from the State

Program-Specific Requirements for Vocational Rehabilitation (Blind)

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

* Sec. 102(b)(D)(iii) of WIOA

a. Input of State Rehabilitation Council

All agencies, except for those that are independent consumer-controlled commissions, must describe the following:

1. input provided by the State Rehabilitation Council, including input and recommendations on the VR services portion of the Unified or Combined State Plan, recommendations from the Council's report, the review and analysis of consumer satisfaction, and other Council reports that may have been developed as part of the Council's functions;

Report of the Vermont State Rehabilitation Council for the Blind and Visually Impaired

SRC Involvement in Planning and Evaluating Statewide Focus Group, Performance Data, and Customer Satisfaction Information. Introduction: The SRC meets in-person every other month and held executive meetings on the alternate months. The entire SRC and DBVI staff meet for an all-day combined meeting each June.

Highlights of SRC meetings from April 2016 to February 2018

In April 2016, a member of the SRC from the Agency of Education gave a presentation about the Personal Learning Plan (PLP) process and how it will work for students on IEP and 504 plans to meet graduation requirements. Vermont high schools are now moving away from credit-based graduation and are now phasing-in the PLP process. The SRC and DBVI staff are hopeful that this will allow some instruction in the use of assistive technology to count towards meeting a graduation standard. It was also discussed that DBVI should create and archive webinars that shows students using assistive technology that can be shared with schools.

The last part of the agenda was led by the DBVI Director including a discussion about "strategies for employment." The group discussed the Section 503 for federal contractors and schedule A requirements for hiring people with disabilities. The SRC also discussed connections with DOL. Rose from DOL was present and said that there will be many opportunities with federal initiatives for "apprenticeships." She will provide information to the group.

In June 2016, DBVI and the SRC held a combined Meeting. The DBVI staff requested input about products under development by DBVI staff. One product was a series of marketing banners that show several DBVI consumers working at their jobs. This is an initiative to educate the public about the abilities of people who are blind or visually impaired. The SRC approved the prototypes that were then produced and currently used at many employment related events.

The SRC also reviewed the results of the closure surveys that asked DBVI customers if they are Better Off as a result of services and if services had been delivered well.

The staff and SRC also discussed the following Results Based Accountability Research Agenda questions:

- High school Students (What connections can you help us make to meet the goals for HS students?)
- Working Age (What connections can you help us make to help people meet employment goals?)
- Policy Decision (Moving from 30 to 90 days).

October 2016 began with a presentation about the successes of the summer Work Based Learning Experience for students called LEAP (Learn, Earn, and Prosper). This gave the SRC the opportunity to see a video of the students at work and to hear summaries and student success stories. Each student received weekly reports of their progress towards skills they will need in the workforce. The SRC had an opportunity to share ideas about potential businesses for future internship sites.

The next meeting was focused on a review of the closure survey results conducted annually by a neutral source. The SRC was pleased to learn that 89% of individuals closed felt that they did get the results they wanted from DBVI. The survey also indicated that 85% of the individuals closed felt that services were delivered well by DBVI. These results and other open-ended responses lead to meaningful discussions with the membership about the best ways to meet the needs of DBVI consumers related to employment. The biggest challenges are attitudes of employers about blindness and the lack of transportation options in our rural state.

At the February meeting, the SRC reviewed the accessible Client Assistance Program brochure and recording. CAP has representation on the SRC membership and requested assistance and feedback to make their materials accessible. There was also a presentation from the Vermont Family Network about statewide student focus groups about vocationally related needs. The SRC had many ideas about ways to include blind and visually impaired students in these discussions. The remainder of the meeting was spent discussing the new WIOA Performance Measures.

In April, the SRC brainstormed ideas about the best ways to collaborate with the Vermont Department of Labor. The DOL has many partners and potential employment related opportunities for DBVI participants. A strong partnership between DBVI and DOL is important. We also gave input and helped plan the June combined SRC and DBVI full-day meeting. This was followed by a discussion about planning the Town Meeting focus groups that will be part of the Statewide Needs Assessment later in the year.

The June meeting was a combined meeting of the SRC and DBVI staff. It included a presentation from each DBVI region about the realities of their caseload with stories to give examples of participant needs. Each DBVI region also discussed key initiatives to assist DBVI consumers with their employment goals. This was followed by a presentation from an SRC member about the assistive technology he uses to be successful in his job. This included a demonstration of the technology and explanation of the tasks he was able to complete at his employment. The afternoon was spent on a discussion about goals and status for WIOA, students, and employment. This included discussions about the current state and how to set goals for the new performance measures. The overall context was guided by Vermont's approach to continuous improvement using the Results-Based Accountability model. This directs us to answer the questions about how our consumers are "Better Off" and that services are Delivered Well."

In fall 2017, the SRC regrouped and began by reviewing the new WIOA Performance Measures. The SRC learned how the new AWARE case management program will capture most of these data to meet the new reporting requirements. The DBVI AWARE system went "live" in September 2017. We also reviewed upcoming goals for the year including a Town Meeting event and a statewide consumer satisfaction survey.

The December 2017 SRC meeting included a review and revision of DBVI Goals and Strategies. The membership had many ideas about connecting with partners including the Department of Labor and the Agency of Education. Ideas included continuation of DBVI initiated work experiences with employers. Current results include many individuals bridging from a work experience to employment. Other people learn new skills for their resume. It is also a great way to educate employers about the abilities and assistive technology used by people who are blind. There was also a strong recommendation to collaborate with the DOL work experience and on-the-job training programs. DBVI was also encouraged to find employers who are interested in job carving opportunities where a person can bring their strengths to the employer. The Agency of Education representative also offered many tools available to staff about personalized learning plans and graduation requirements. The Chair of the Policy Committee also

updated the SRC about WIOA related DBVI policy revisions that are in process. The meeting ended with a recommendation to have fewer strategies and keep them focused on the key goals.

The SRC dedicated the February 2018 meeting to updating the goals and strategies based on the CSNA. The meeting began with a review of the WIOA performance measures. Then the SRC discussed each of the 14 DBVI current strategies. After a detailed discussion about each of the strategies the group made a list of top priorities.

Some highlights from the strategy discussion include ideas about a comprehensive outreach strategy. The SRC believes that DBVI should make efforts to inform key organizations about the services that are available. This includes outreach to businesses, minority groups, and DOL partner programs. They also made had ideas about ways to share DBVI planning resources by using some of the channels at AOE like the WIKI Transition page. This resource is well used by school staff and is a good way to share information with LEAs.

In addition to outreach and sharing information the SRC supports DEVI's ongoing efforts to create consumer-driven events and opportunities. The next event will be planned with consumer input and will be held in the fall. A new initiative is to create a listserv that connect clients to share ways they are using technology. There was also interest in creating podcasts that highlight some key technologies and examples of how people use technology to accomplish tasks at work or for independence.

There was an in-depth conversation about the best strategies to connect with the workforce system and American Job Centers and all DOL partners. The intent of the group is that there should be concrete steps and a plan to connect DBVI consumers to these programs and to have a referral process that keeps all partners involved rather than a hand-off to another organization.

One topic that is part of every CSNA is transportation. The SRC is very interested in a new initiative at the VT Department of Transportation that connects travels with all of the resources and potential rides in a given area. This is in beta form and is being designed for accessibility. It was decided to invite VTRANS to the SRC meeting in April to discuss the tool.

The meeting ended with a discussion about identifying the top strategies. They include:

- Partnering with all DOL—Implement a plan for staying connected.
- Pre-Employment Transition—Share the DBVI tools that can be used for student transition planning.
- Outreach—Implement a comprehensive plan that includes businesses, eye doctors, and other human service organizations.
- Technology—Create a listserv to connect DBVI consumers and the blind community.

The public hearing was held on February 28, 2018 at the Waterbury State Office Complex (Rm. 109a). No comments were submitted.

2. the Designated State unit's response to the Council's input and recommendations; and

DBVI Response to SRC Input:

DBVI and the SRC worked collaboratively to review Statewide Assessment and update Goals and Priorities. The SRC and DBVI agree that outreach efforts and educating the public about blindness is very important. There is also agreement to continue consumer-driven events and opportunities for peer interaction. The SRC reviewed and gave input on the DBVI section of the statewide assessment, new goals and strategies, as part of the WIOA Unified Plan.

3. the designated State unit's explanations for rejecting any of the Council's input or recommendations.

DBVI agreed with all SRC recommendations.

b. Request for Waiver of Statewideness

When requesting a waiver of the statewideness requirement, the designated State unit must identify the types of services to be provided by the program on a non-statewide basis. The waiver request must also include written assurances that:

1. a local public agency will provide the non-Federal share of costs associated with the services to be provided in accordance with the waiver request;

Vermont DBVI is not requesting a waiver of state wideness.

2. the designated State unit will approve each proposed service before it is put into effect; and

Not applicable.

3. All State plan requirements will apply

requirements of the VR services portion of the Unified or Combined State Plan will apply to the services approved under the waiver.

Not applicable.

c. Cooperative Agreements with Agencies Not Carrying Out Activities Under the Statewide Workforce Development System.

Describe interagency cooperation with and utilization of the services and facilities of agencies and programs that are not carrying out activities through the statewide workforce development system with respect to:

1. Federal, State, and local agencies and programs;

At this time DBVI has no cooperative agreements with agencies of this description.

2. State programs carried out under section 4 of the Assistive Technology Act of 1998;

Not applicable.

3. Programs carried out by the Under Secretary for Rural Development of the United States Department of Agriculture;

Not applicable.

4. Noneducational agencies serving out-of-school youth; and

Not applicable.

5. State use contracting programs.

Not applicable.

d. Coordination with Education Officials

Describe:

1. DSU's plans

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with disabilities from school to the receipt of VR services, including pre-employment transition services, as well as procedures for the timely development and approval of individualized plans for employment for the students.

The designated State unit's plans, policies, and procedures for coordination with education officials to facilitate the transition of students with visual disabilities from school to the receipt of DBVI services, including pre-employment transition services.

The DBVI Director meets regularly with Vermont Agency of Education staff to coordinate services, and include VR, Department of Labor, and the Developmental Disabilities Service.

DBVI made a commitment many years ago to create opportunities for students to prepare for work, vocational training and college. Twelve years ago DBVI created a partnership called the Connections Team. This involved many partners and the mission of the group was to make connections and find ways for students to have meaningful work experiences and job readiness training. The energy of this team created the LEAP program which has grown and expanded each year. With the passage of WIOA in July 2014, the team includes several new partners and connections.

DBVI Blind Services Counselors work closely with all of the Teachers of the Visually Impaired in their region to connect students with Pre-ETS and Transition planning. Vermont is unique because TVI services are provided by one statewide agency that has a contract with AOE and the Local Education Agencies to provide consultation and direct services to blind and visually impaired students. The TVI's work directly with schools and families beginning at birth through high school graduation. DBVI is included on the release form for all students with a disability so TVI's begin conversations about students when they are entering high school. This begins the outreach to include these students in Pre-ETS activities. A letter goes to each family and school districts to explain Pre-ETS and how DBVI can help student with transition to employment.

DBVI staff also participates in local Core Transition Teams across the state. These teams include school staff, mental health providers, employment staff, and VR staff. The intent is to share ideas and resources to develop work experiences, job readiness training, and employment opportunities for students in their region. DBVI is a partner with VR to sponsor and annual conference that brings all of the regional core teams together.

2. Information on the formal interagency agreement with the State educational agency with respect to:

A. consultation and technical assistance to assist educational agencies in planning for the transition of students with disabilities from school to post-school activities, including VR services;

The DBVI Director meets quarterly with the Special Education Director of the Vermont Agency of Education, AOE Transition staff, and VR to coordinate the annual Transition Conference and to provide general updates. A person from the AOE Transition staff is a member of DBVI's SRC. He provides regular updates about school initiatives and resources for transition planning. He recently explained the requirements of the new Personal Learning Plans and how they will be implemented for students with and IEP. AOE, DVR, and DBVI are currently in the process of drafting a new Interagency Agreement as required under WIOA.

B. transition planning by personnel of the designated State agency and educational agency that facilitates the development and implementation of their individualized education programs;

DBVI Blind Services Counselors developed and use Action Planning tools for transition planning for the IEP team. The Action Plan is a checklist of activities that need to happen for a student who is visually impaired to meet their transition goals. For example, students how plan to attend college have many action plan items that should occur each year leading up to graduation. The approach is designed for different members of the team to take responsibility for certain action items. Sometimes it is the DBVI Counselor, special educator, TVI, or guidance counselor. The responsibilities are shared and the student is included in all aspects of the planning.

C. roles and responsibilities, including financial responsibilities, of each agency, including provisions for determining State lead agencies and qualified personnel responsible for transition services;

Financial responsibilities are laid out in the draft MOU with AOE as follows:

DVR/DBVI Responsibility

To the extent funds are available, DVR/DBVI are responsible for paying for pre-employment transition services for potentially eligible students. In addition, to the extent funds are available, DVR/DBVI are responsible for paying for vocational rehabilitation and school-to-work transition services for students and youth determined eligible for DVR or DBVI services with an approved Individual Plan for Employment (IPE.)

AOE and LEA Responsibility

AOE and LEAs are responsible for paying for any transition services that are also considered to be special education or related services necessary for providing a free appropriate public education to students with disabilities.

Criteria to Determine Which Agency is Responsible to Pay for Similar Services Both Can Provide Under Their Respective Law

The following criteria shall be used, when determining which entity should pay for a similar service that both entities can provide under their respective laws:

A. The purpose of the Service

Is the purpose of the service primarily related to an educational outcome or an employment outcome?

B. Customary Services

Is the service one that the school customarily provides under IDEA part B?

For example, if a school ordinarily provides work-based learning experiences for students with disabilities, the fact those services are now authorized under the Rehabilitation Act as pre-employment transition services does not mean the school should cease providing those services and refer those students to DVR or DBVI.

C. Eligibility

Is the student with a disability eligible for transition services under IDEA?

Because the definition of "student with a disability" for the DVR and DBVI programs include an individual with a disability for purposes of section 504 of the Rehabilitation Act, it is a broader than the definition under IDEA. DVR and DBVI are authorized to provide transition services for students with disabilities who meet the definition of an individual with a disability for purposes of section 504 of the Rehabilitation Act.

Nothing in this agreement is to be construed as reducing the responsibility of the local educational agencies or any other agencies under IDEA to provide or pay for any transition services that are also considered to be special education or related services necessary for providing a free appropriate public education to students with disabilities.

D. procedures for outreach to and identification of students with disabilities who need transition services.

DBVI Counselors meet with each TVI in their region at the beginning of each school year and during the year to get introduced to each student, family, and school personnel. The TVI caseload includes all students who are blind or visually impaired in the state so DBVI is able to directly outreach to the students and families to promote the Pre-ETS and transition support that is available. DBVI also reaches out directly to local special education administrators and 504 coordinators. DBVI also works collaboratively with DVR transition staff who are in the schools and often refer students to DBVI.

e. Cooperative Agreements with Private Nonprofit Organizations

(Formerly known as Attachment 4.8(b)(3)). Describe the manner in which the designated State agency establishes cooperative agreements with private non-profit VR service providers.

DBVI maintains agreements and contracts with two non-profit organizations and CRPs in particular. The Vermont Association for the Blind and Visually Impaired (VABVI) provides direct teaching and rehabilitation training to Vermonters who are visually impaired. They are the only other organization in Vermont providing Orientation and Mobility and Vision Rehabilitation services to individuals who are blind or visually impaired. Due to the close working nature and cooperation there are no duplication of services. DBVI also works closely with The Vermont Association of Business Industry and Rehabilitation (VABIR) to provide job development and soft skills training by Employment Consultants.

f. Arrangements and Cooperative Agreements for the Provision of Supported Employment Services

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

(Formerly known as Attachment 4.8(b)(4)). Describe the designated State agency's efforts to identify and make arrangements, including entering into cooperative agreements, with other State agencies and other appropriate entities in order to provide supported employment services and extended employment services, as applicable, to individuals with the most significant disabilities, including youth with the most significant disabilities.

DBVI works closely with DVR for Supported Employment coordination. DBVI is also part of all the agreements for Supported Employment services, such as agreements with the Division of Disability Services, TBI services, the Department of Mental Health and the local CRT programs. Because of its small size and the fact that it serves a low incidence population DBVI feels that it can serve the few individuals seeking supported employment best in the above manner. Most individuals who qualify for supported employment and are visually impaired are served by other agencies as their primary disability has been identified as other than vision impairment. Most individuals are eligible for Medicaid waivers and DBVI does provide short-term worksite support.

DVR and DBVI have new agreements with the Vermont Development Disabilities Services Division (DDSD) to provide extended services for individuals with developmental disabilities. The primary source of funding for extended services for individuals with developmental disabilities is Home and Community—based Medicaid Waiver funds.

g. Coordination with Employers

(Formerly known as Attachment 4.8(b)(5)). Describe how the designated State unit will work with employers to identify competitive integrated employment and career exploration opportunities in order to facilitate the provision of:

1. VR services; and

DBVI collaborates with General Vocational Rehabilitation in efforts to establish relationships with Vermont businesses. This is coordinated approach is desired by the businesses and creates meaningful points of contact. Below is a description of the approach established by General VR and used by DBVI.

DUAL CUSTOMER DESIGN Vermont's dual—customer approach considers both individuals with disabilities and the business community as key customers of the Vocational Rehabilitation program. To that end, Vermont DVR has established a cadre of Business Account Managers across the state whose primary responsibility is to develop and sustain relationships with the

businesses in their respective communities. The Business Account Managers also facilitate local Employment Teams made up of the various employment programs serving Vermonters with disabilities. The Employment Teams are designed to improve collaboration between programs and streamline employer outreach in order to maximize resources and increase opportunities for candidates served by the Vocational Rehabilitation program.

In addition to the Business Account Managers, Vermont DVR and DBVI contracts Employment Consultants, who provide placement services and assistance, including retention services, to individual candidates. These Employment Consultants, in concert with their respective Business Account Managers, are in the community developing contacts and establishing relationships with businesses of all sizes. Due to the rural nature of Vermont, and the fact that trusting relationships are developed over time, Vermont has developed ways to track employer engagement over time.

EMPLOYER DATA Tracking of employer outreach is maintained utilizing Salesforce, a Customer Relations Management (CRM) solution used by many large corporations. All Business Account Managers and Employment Consultants enter information into this system (only business information is captured, there is no client information and the information is transparent to everyone). To track employer engagement, the following information is gathered:

Opportunities: Opportunities are defined as any activity, paid or un—paid, offered by a particular business. These activities range from informational interviews and job shadows to short—term work experiences and paid employment. All opportunities are captured for each business. **Contacts:** Contacts are defined as the individuals in a business with whom Employment Consultants and/or Business Account Managers have developed a relationship. In many cases these contacts are Hiring Managers, Owners and Supervisors. **Activities:** Each time an Employment Consultant or Business Account Manager interacts with a contact, an activity note is entered into Salesforce. This allows all Employment Team members to see a running history of conversations and activities with that business.

2. transition services, including pre-employment transition services, for students and youth with disabilities.

IMPLICATIONS FOR DVR CUSTOMERS Business outreach has been a priority for Vermont DVR because: 1. In developing relationships over time, we are able to position ourselves as a staffing service with a variety of options for businesses to consider; 2. Coordinated business outreach, captured in Salesforce, allows for greater variety in the kinds of businesses we are meeting, and the concurrent variety in opportunities for DVR candidates; 3. Gathering information on businesses willing to offer worksite experiences, company tours, informational interviews... etc., will better support career exploration and skill development for both adults and students; 4. Our business partners can support Pre—Employment Transition Services activities in schools, including practice interviews, company tours and overviews, and identifying summer employment opportunities; 5. Business partners can support the work of our In—School Transition Counselors, providing information on industry trends, skill requirements and other factors related to particular employment sectors; 6. By engaging businesses in working with students, the students will have a better understanding of their local labor market through work experiences, job shadows and paid employment. This in turn should prepare them for transition to either post—secondary education or employment.

h. Interagency Cooperation

Describe how the designated State unit will collaborate with the State agency responsible for administering each of the following programs to develop opportunities for competitive integrated employment, to the greatest extent practicable:

1. the State Medicaid plan under title XIX of the Social Security Act;

DVR and DBVI as Divisions within the Department of Disabilities, Aging and Independent Living (DAIL) are in the process of entering an Intergovernmental Agreement with the Department of Vermont Health Access (DVHA). The purpose of the agreement is as follows:

To describe how Vocational Rehabilitation Title I and Title VI-B funding will be utilized with Medicaid Global Commitment Funding to support employment services for the following populations:

- **Supported employment services for adults with developmental disabilities served through the Vermont Department of Disabilities, Aging and Independent Living (DAIL) Developmental Disabilities Services Division, hereinafter referred to as DDSD.**
- **Youth with severe emotional disturbance (SED) served by the Department of Mental Health (DMH), Children’s Division through the JOBS programs.**
- **Adults with psychiatric disabilities served through the Community Rehabilitation and Treatment (CRT) program administered by the Department of Mental Health (DMH).**

The agreement sets out the following guiding principles:

DAIL/DVR/DBVI and DVHA are committed to implementing employment services through the blending and braiding of VR Title I and Title VI-B funding with DDSD Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide employment services for individuals with developmental disabilities, youth with SED and adults with psychiatric disabilities through a statewide network of community providers.

The agreement also lays out eligibility criteria for the respective programs and the financial responsibilities of each State unit. This is laid out as follows:

DAIL/DVR/DBVI Responsibility

Funding of Time-Limited Supported Employment Services

Except for youth with significant disabilities, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DAIL/DVR/DBVI will fund:

- **Supported employment assessment services**
- **Supported employment job search and placement services**
- **Supported employment work supports**

- Customized employment
- Benefits and work incentive counseling
- Progressive employment
- Case services for additional work supports such as work clothes and transportation

Funding for Extended Supports

Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DAIL/DVR/DBVI time-limited services. Extended services can be funded by DAIL/DVR/DBVI for youth with the most significant disabilities, for a period not to exceed four years. DAIL/DVR/DBVI may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities

DHVA Global Commitment Funding of Employment Services

Developmental Services

Supported employment and extended employment services are through the Global Commitment, Home and Community Based Medicaid Services (HCBS) for people who meet the eligibility criteria for DDS. DAIL/DDSD HCBS funding is individualized based on the support needs of the consumer. If the HCBS has a line item for employment, then an employment outcome must be included in the Individualized Support Agreement (ISA). HCBS funding can be used to support both short term assessment, job development, job placement services and extended services.

JOBS Program

The JOBS program supported employment services and extended employment services are funded through Global Commitment, Medicaid Case Rate funding administered by DMH. Funds will be provided through the DA Master Grant Agreements.

CRT Evidence Based Supported Employment Services

CRT evidence-based supported employment services are funded through the Global Commitment, Medicaid CRT Case Rate administered by DMH. Funds will be provided through the DA Master Grant Agreements.

The agreement once signed will be in effect for five years.

2. the State agency responsible for providing services for individuals with developmental disabilities; and

DVR and DBVI are housed within the same department as the Developmental Disabilities Services Division (DDSD). There are intra-departmental was developed within DAIL and signed on September 5th 2017. The purpose of the agreement is outlined as follows:

The purpose of this agreement is to describe how DVR, DBVI and DDSD will cooperate to implement, expand and improve supported employment services for adults with developmental disabilities in the State of Vermont. Supported employment services for adults with developmental disabilities are provided through a system of approved nonprofit community providers, including the Designated Agencies (DA), the Specialized Service Agencies (SSA) and Independent Service Organizations (ISO). DDSD, DVR and DBVI fund supported employment services jointly through grant and contractual relationships with these community providers.

The agreement lays out the following guiding principles:

DDSD, DVR and DBVI are sister Divisions within DAIL and operate under the direction of the DAIL Commissioner. As such, DVR, DBVI and DDSD take a "one agency" approach to the funding and implement of supported employment services for adults and youth with developmental disabilities.

DVR, DBVI and DDSD have collaborated for over thirty years to implement supported employment services for adults with developmental disabilities. DVR, DBVI and DDSD are committed to continuing this collaboration based on the following guiding principles:

- All people with developmental disabilities, who want to, can work with the appropriate supports.
- Work benefits people with developmental disabilities in the same way it does people without disabilities. Increased income, a sense of contribution and skill acquisition, increased confidence, independence and social connections all enable people to develop meaningful careers.
- The value of work extends far beyond wages earned. Employers and the community benefit from the social inclusion and diversity people with developmental disabilities bring to the workforce through improved morale, customer loyalty and overall productivity.

The agreement includes an inter-division planning and policy group including all the Directors that will meet at least quarterly. The agreement describes the eligibility criteria for each program. It also lays out the fiscal responsibilities as follows:

Joint Responsibility

DVR, DBVI and DDSD are committed to implementing supported employment services through the blending and braiding of VR Title I and Title VI-B funding with DDSD Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide supported employment services for individuals with developmental disabilities through a statewide network of community providers.

DVR and DBVI Responsibility

Funding of Time-Limited Supported Employment Services

Except for youth with significant disabilities, DVR and DBVI funding of supported employment is time-limited for a period of not more than 24 months. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DVR and DBVI will fund:

- Supported employment assessment services
- Supported employment job search and placement services
- Supported employment work supports
- Customized employment

Funding for Extended Supports

Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DVR time-limited services. Extended services can be funded by DVR and DBVI for youth with the most significant disabilities, for a period not to exceed four years. DVR may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

Availability of Funding

The DVR and DBVI commitment to funding supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DVR may reduce or end funding for supported employment services.

DDSD Responsibility

Funding for Supported Employment Services and Extended Services

DDSD will fund supported employment and extended employment through the Global Commitment, Home and Community Based Medicaid Services (HCBS) for people who meet the eligibility criteria for DDS. HCBS funding is individualized based on the support needs of the consumer. If the HCBS has a line item for employment, then an employment outcome must be included in the Individualized Support Agreement (ISA). HCBS funding can be used to support both short term assessment, job development, job placement services and extended services.

Availability of Funding

The DDSD commitment to funding supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DDSD may reduce or end funding for supported employment services.

The agreement also lays out a commitment to joint monitoring of supported employment services and joint training and technical assistance. The agreement is in effect for five years.

3. the State agency responsible for providing mental health services.

DVR and DMH have a long history of collaboration around the provision of supported employment services for adults with psychiatric disabilities and youth with severe emotional behavioral disorders. This is reflected in the MOU's overview and purpose as follows:

The purpose of this agreement is to describe how DAIL/DVR/DBVI and DMH will cooperate to implement, and improve employment services, supported employment services and evidence based supported employment services for youth and adults with psychiatric disabilities in the State of Vermont. Supported employment and employment services for youth and adults with psychiatric disabilities are provided through a system of approved non-profit community providers, including the Designated Agencies (DAs). DMH and DAIL/DVR/DBVI fund supported employment services jointly through grant and contractual relationships with these community providers. There are two primary programs within the DMH system that provide employment services:

- **The JOBS Program: JOBS provides supported employment services for youth with Severe Emotional Disturbance (SED)**
- **The Community Rehabilitation and Treatment (CRT) Program: CRT provides employment services and supported employment for adults with severe psychiatric disabilities.**

The agreement lays out the following guiding principles:

DAIL/DVR/DBVI/DBVI and DMH have collaborated for over thirty years to implement supported employment services for youth and adults with psychiatric disabilities. DAIL/DVR/DBVI and DMH are committed to continuing this collaboration based on the following guiding principles.

- **All people with psychiatric disabilities, who want to, can work with the appropriate supports.**
- **Work benefits people with psychiatric disabilities in the same way it does people without disabilities. Increased income, a sense of contribution and skill acquisition, increased confidence, independence and social connections all enable people to develop meaningful careers.**
- **Employment is an essential component of the recovery process for people with psychiatric disabilities.**

The agreement forms an interagency planning and policy development group including the DVR/DBVI Directors and the DMH Directors of Adult Mental Health and Children's Mental Health. The agreement describes the eligibility criteria for both systems and the service models as follows:

DAIL/DVR/DBVI and DMH support two models of individualized supported employment services in competitive, integrated employment settings.

JOBS

The JOBS Program is an innovative supported employment and intensive case management service for youth with psychiatric disabilities, who have dropped out or left school, that uses work as a means to reach this

challenging population. JOBS is a voluntary program where youth, once engaged, are assisted in transitioning from school, prison, or the streets and supported in accessing services to help them reach their individual goals and greater independence.

Individualized Placement and Support (IPS): Evidence Based Supported Employment Services.

IPS supported employment is an evidence-based approach to providing vocational services for adults with severe psychiatric disabilities. IPS integrates employment services within community mental health treatment and case management services.

DAIL/DVR/DBVI and DMH do not support any type of group or segregated employment service model such as sheltered workshops, work crews, enclave placements or any approach that does not result in competitive, integrated employment. DAIL/DVR/DBVI and DMH will promote and support evidence based supported employment as the primary service model, through policy development, contract/grant language, training and technical assistance, and monitoring and quality review.

The agree describes the fiscal responsibilities of the respective Departments as follows:

Joint Responsibility

DAIL/DVR/DBVI and DMH are committed to implementing supported employment services through the blending and braiding of VR Title I and Title VI-B funding with DMH Global Commitment Medicaid funding. The goal is to support a seamless and well-integrated system to provide supported employment services for adults with psychiatric disabilities and youth with SED through a statewide network of community providers.

DAIL/DVR/DBVI Responsibility

Funding of Time-Limited Supported Employment Services

Except for youth with significant disabilities, DAIL/DVR/DBVI funding of supported employment is time-limited for a period of not more than 24 months. Funded services must be based on a determination of the needs of an eligible individual, as specified in an individualized plan for employment. DAIL/DVR/DBVI will fund:

- Supported employment assessment services
- Supported employment job search and placement services
- Supported employment work supports
- Customized employment
- Benefits and work incentive counseling
- Progressive employment
- Case services for additional work supports such as work clothes and transportation

Funding for Extended Supports

Extended services are the ongoing support services that are needed to support and maintain an individual with a most significant disability in supported employment, after an individual has made the transition from DAIL/DVR/DBVI time-limited services. Extended services can be funded by DAIL/DVR/DBVI for youth with the most significant disabilities, for a period not to exceed four years. DAIL/DVR/DBVI may not provide extended services to individuals with the most significant disabilities who are not youth with the most significant disabilities.

Availability of Funding

The DAIL/DVR/DBVI commitment to funding supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DAIL/DVR/DBVI may reduce or end funding for supported employment services.

DMH Responsibility

Funding for JOBS

DMH will fund the JOBS program supported employment services and extended employment services through Global Commitment, Medicaid Case Rate funding. Funds will be provided through the DA Master Grant Agreements.

Funding for IPS Supported Employment Services and Extended Services

DMH will fund evidence-based supported employment through the Global Commitment, Medicaid CRT Case Rate. Funds will be provided through the DA Master Grant Agreements.

Availability of Funding

The DMH commitment to funding JOBS and IPS supported employment services is contingent on the availability of state and federal funds. In the event state or federal funds are reduced or eliminated, DMH may reduce funding for supported employment services.

The agreement also includes a commitment to joint monitoring of the programs and joint training and technical assistance. The agreement is in effect for five years from date of signature.

i. Comprehensive System of Personnel Development; Data System on Personnel and Personnel Development

(Formerly known as Attachment 4.10)). Describe the designated State agency's procedures and activities to establish and maintain a comprehensive system of personnel development designed to ensure an adequate supply of qualified State rehabilitation professional and paraprofessional personnel for the designated State unit, including the following:

1. Data System on Personnel and Personnel Development

A. Qualified Personnel Needs.

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on qualified personnel needs with respect to:

- i. the number of personnel who are employed by the State agency in the provision of VR services in relation to the number of individuals served, broken down by personnel category;

The Vermont Division for the Blind and Visually Impaired (DBVI) operates in the Department of Disabilities, Aging, and Independent Living (DAAIL) in the Agency of Human Services (AHS). DBVI employs 10 full time positions and one half time position. DBVI is organized to allow a structure for advancement based increased professional abilities, improved services and knowledgeable management by recognizing the individual skills within. In FFY 2017 DBVI Counselors served 257 clients. DBVI has sufficient VR Counselor capacity to meet the needs of vocational rehabilitation clients.

DBVI has four regional offices located in Burlington, Montpelier, Rutland and Springfield. Each of the four offices have one Counselor. The Burlington and Montpelier office have an Associate Counselor, completing an internship while attending the University of Southern Maine, and will obtain a Master of Science in Counseling. It is expected that in August 2018 these two positions will be upgraded to full time Rehabilitation Counselor providing vocational rehabilitation services. This is a significant change in the structure and will meet the need for providing services under WIOA regulations. Two added Counselor positions provide increased capacity to serve PRE-ets students and for development of programs with the Department of Labor (DOL). Two Rehab Associate positions have divided responsibilities to support the vocational rehabilitation program in the north and south regions of the State of Vermont. These two positions are supervised by the Counselors in the Montpelier and Rutland offices. The Springfield office has one vacant full time Administrative Services Coordinator position. Technology services are provided by the Blind Services Assistive Technology Coordinator and a contracted professional Rehabilitation Technology expert. The Assistive Technology Coordinator provides services for DBVI clients and covers the entire State. DBVI has two Employment Consultants. This service is contracted through VABIR (Vermont Association of Business Industry and Rehabilitation). Overall supervision is provided by the Division Director.

- ii. the number of personnel currently needed by the State agency to provide VR services, broken down by personnel category; and

Job Title	Total positions	Current vacancies	Projected vacancies over the next 5 years
Blind Services Director	1	0	0
Administrative Services Coordinator	1	1	0
Senior Rehabilitation Counselor	2	0	0
Rehabilitation Counselor	.5	0	0
Rehabilitation Associate I	1	0	0
Rehabilitation Associate II	1	0	0
Associate Counselor	2	0	0
Adaptive Technology Coordinator	1	0	0
Rehabilitation Counselor II	1	0	0

- iii. projections of the number of personnel, broken down by personnel category, who will be needed by the State agency to provide VR services in 5 years based on projections of the number of individuals to be served, including individuals with significant disabilities, the number of personnel expected to retire or leave the field, and other relevant factors.

In FFY 2017 DBVI (4) Counselors served an average of 64 consumers annually. DBVI Is prepared to serve a similar average of consumers per Counselor for FFY 2018. At this time DBVI has maintained a high level of performance. The recent changes of personnel structure will ensure DBVI clients will be served, including those with significant disabilities, students and adults requesting vocational rehabilitation services. DBVI expects to have two Associate Counselors position upgraded to full time Rehabilitation Counselors. We have addressed the issue of Counselors retiring or leaving the field and staffing levels are sufficient. This is due in part to the way the DBVI program is structured, which allows for staff development and advancement. DBVI is proud of its quick turn around services and ability to quickly establish eligibility and develop plans for services.

B. Personnel Development

Describe the development and maintenance of a system for collecting and analyzing on an annual basis data on personnel development with respect to:

- i. a list of the institutions of higher education in the State that are preparing VR professionals, by type of program;

Personnel Development needs over the past two years have been address by our relationship with University of Southern Maine. Two DBVI Associate Counselors have been enrolled in the USM Counselor Education Graduate Program. It is expected that both positions will receive a Master of Science in Counseling. Training and supervision is provided under the guidance of a rehabilitation counselor. Training includes instruction regarding the implications of visual impairment and how to provide expert services for people who are visually impaired and seeking employment. DBVI is coordinating all educational training with Charles Beracchio, EdD.CRC from the University of Southern Maine. The Master of Science requires the students to take a total of fifty-four credit hours. After completion of the program counselors will have the required knowledge needed to work in the rehabilitation field. Classes focus on the medical and psychological aspects that surround people with disabilities in our society. The training teaches students how to promote equality and empower clients. Below is an outline of the program syllabus:

Core Courses (27 credits)

EDU 600 Research Methods and TechniquesHCE 605 Psychological Measurement and EvaluationHCE 620 Fundamentals of Counseling TheoriesHCE 621 Fundamentals of Counseling SkillsHCE 626 Group Process and ProceduresHCE 627 Group Counseling

PracticumHCE 668 Human DevelopmentHCE 690 Individual Counseling Practicum SeminarHCE 691 Individual Counseling Practicum Laboratory

Required Concentration Courses (24 credits)

HCE 510 Introduction to Rehabilitation Counseling and ServiceHCE 514 Psychiatric Rehabilitation: Evidence-based Practices and TreatmentHCE 611 Medical and Psychological Aspects of Disability and RehabilitationHCE 612 Multicultural Counseling: Social & Cultural Foundations of Helping Diverse Families HCE 615 Vocational Counseling and Placement in RehabilitationHCE 619 Recovery-Oriented Origins of Psychiatric Rehabilitation PracticeHCE 642 Perspectives on Chemical DependencyHCE 686 Internship in Counselor Education (6 credits - 600 hours)

Vermont has no accredited graduate school offering a master's degree in Rehabilitation Counseling. To meet the Comprehensive System for Professional Development (CSPD) standards, a Counselor needs either a master's degree in Rehabilitation Counseling or a master's degree in a related field plus completion of four additional core rehabilitation courses. To help meet the requirement for education, Assumption College, University of Massachusetts, and Springfield College of Human Services have partnered to provide the required masters level courses to be CSPD qualified. Presently, all DBVI rehabilitation counselors have met the educational requirements.

ii. the number of students enrolled at each of those institutions, broken down by type of program; and

Two Associate Counselors are enrolled voluntarily in a master's degree program in Rehabilitation Counseling through the University of Southern Maine's (USM) on—line, distance learning program funded by an RSA long—term training grant to USM.

iii. the number of students who graduated during the prior year from each of those institutions with certification or licensure, or with the credentials for certification or licensure, broken down by the personnel category for which they have received, or have the credentials to receive, certification or licensure.

To date, all DBVI rehabilitation counselor completed the CSPD required rehabilitation courses.

2. Plan for Recruitment, Preparation and Retention of Qualified Personnel

Describe the development and implementation of a plan to address the current and projected needs for qualified personnel including, the coordination and facilitation of efforts between the designated State unit and institutions of higher education and professional associations to recruit, prepare, and retain personnel who are qualified, including personnel from minority backgrounds and personnel who are individuals with disabilities.

DBVI recruits qualified personnel through The University of Southern Maine, Assumption College, University of Massachusetts, and Springfield College of Human Services who have received a master's degree in Rehabilitation Counseling. These graduates meet the highest standard of education and are able to obtain certification at the highest level for this field. DBVI also recruits qualified personnel in a related field such as Social Work, Special Education, School Guidance, Mental Health Counseling, or Community Mental Health Services from New England colleges by posting positions on internal employment pages of the various college websites. All of these graduates are candidates for counseling vacancies if they are willing to complete the four core rehabilitation courses. DBVI recruit's professionals with an expertise in rehabilitation and knowledge of visual diagnosis and the implications of visual disability. State personnel policies require DBVI to consider qualified applicants on the Reduction in Force list before other applicants. DBVI advertises openings through the State recruitment system, through local newspapers and make every effort to include individuals with disabilities and minority backgrounds to ensure a diverse qualified professional staff. DBVI constantly checks its caseload for interested and appropriately skilled individuals to provide services to Vermonters with vision impairments. DBVI ensures a high standard of qualified personnel with training directed toward an expertise for working with people with visual impairment. This is done through close collaboration with the Vermont Association for the Blind and Visually Impaired.

Rehabilitation Associates are recruited with a strong preference given to those with bachelor's degrees and a strong commitment to blind services. Rehabilitation Associates with a bachelor's degree are encouraged to take the CSPD required master's level courses. They are encouraged to pursue a master's level program in preparation for retention of qualified personnel. Through flexible work schedules and approved time off, DBVI makes it as convenient as possible to pursue degrees and education. DBVI will continue to support staff members who want to further their relevant education, as this will benefit the whole staff through projects and shared information. DBVI supports the staff and its professional development through public recognition and opportunities for job advancement through a developed career ladder within the division. New staff participates in a training program that covers information appropriate to serving individuals who have vision loss. Trainings address the implications of visual loss and services such as orientation and mobility, rehabilitation teaching, and low vision service. In addition, training and consultation occurs with our rehabilitation technology consultant on an ongoing basis.

3. Personnel Standards

Describe the State agency's policies and procedures for the establishment and maintenance of personnel standards consistent with section 101(a)(7)(B) and 34 CFR 361.18(c) to ensure that designated State unit professional and paraprofessional personnel are adequately trained and prepared, including:

A. standards that are consistent with any national or State-approved or -recognized certification, licensing, registration, or other comparable requirements that apply to the profession or discipline in which such personnel are providing VR services; and

DBVI follows the same standard used by the Division of Vocational Rehabilitation to be in compliance with Section 101(a)(7) of the Rehabilitation Act Amendments of 1992. This requires State Vocational Rehabilitation agencies to establish qualified personnel standards for rehabilitation personnel. This addresses the qualifications necessary to meet the highest standards which are required in the State of Vermont. DBVI follows standards set forth in the Comprehensive System for Professional Development (CSPD). This prescribes a national standard for vocational rehabilitation counselor qualifications. This standard gives highest priority to counselors with a master's degree in rehabilitation counseling. The second level of priority is for counselors with related degrees in social work, psychology, mental health counseling or special education. This group must complete four additional courses to meet the standard: Foundations of Rehabilitation, Career Counseling, Vocational Assessment, and Medical and Psychosocial Aspects of Disability. All efforts are made to hire new Counselors into this standard. When this is not possible, new hires are required, by written agreement, to attain the standard in a reasonable amount of time. The availability of on—line course work should allow any new hires to reasonably take the four "core" courses or any other course work they would need to reach this standard. DBVI has a standard of Bachelor's degree for new Rehabilitation Associates. This standard lays the groundwork for moving Associates into graduate programs, helping to assure DBVI of maintaining qualified staff. Presently all DBVI Rehab Counselor positions are filled by

qualified professionals. All staff receives extensive training to help them learn and understand services for visually impaired individuals and the implication caused by visual loss. Training provided is focused around meeting with other highly trained vision professionals both within DBVI and from our sister agency, the Vermont Association for the Blind and Visually Impaired. All new employees receive training with a qualified rehabilitation therapist, a low vision therapist and orientation and mobility instructor. In addition they are scheduled to meet with our rehabilitation technology specialist to learn about how adaptive equipment can enhance job opportunities. They will meet with professionals from Vermont Association of Business Rehabilitation and Industry to learn about job placement. The performance expectations of all newly hired staff are to meet all the expected standards established for the position. DBVI allows for a flexible working schedule, makes training assistance available, supports state, regional and national learning options and is strongly supportive of the time, effort, and commitment expended by each staff member to establish and maintain educational standards. DBVI encourages the use of training funds for staff to use to attain and maintain professional standards and to maintain and enhance their professional capabilities. To maintain training and skill levels, DBVI constantly seeks and distributes information and training opportunities for staff at the regional and national level. DBVI maintains current educational material through journals, Internet sites and information gathered at conferences and trainings. DBVI works with the Staff Development and Training Coordination at DVR to ensure inclusion in opportunities offered by educational institutions for vocational rehabilitation professionals. Opportunities for on—line and distance learning are also available.

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.

Understanding labor force and the needs of individuals with disabilities DBVI will ensure that personnel have a 21st century understanding of the evolving labor force and the needs of individuals with visual impairment through our partnership with the Department of Labor (DOL). DBVI is part of the unified plan to meet the requirements of the Workforce Innovation Act (WIOA). Cross trainings with DOL, Division of Vocational Rehabilitation and the Agency of Education are designed to address the needs for Adults and Students with disabilities. DBVI staff attended training on Pathways to Promising Careers. DBVI staff have direct access to Vermont DOL's 12 regional Job Centers. DBVI is working closely with the Labor Planning and Support Administrator Youth Program Manager from DOL. Training have been set up for staff to learn about the evolving Labor Market and programs to assist students with visual impairment. DBVI is partnering with DOL to look closer at apprenticeship programs and on-the-job training opportunities that will produce success in obtaining high wages for our consumer's. DBVI works closely with VABIR (Vermont Association of Business Industry and Rehabilitation) and the local Sales Force boards to learn information about local employers and job opportunities. DBVI Staff attended training, presented by, Dr. Paul Harrington from the Center for Labor Market Studies at Northeastern University and the VT Department of Labor. This training provided counselors with information and skills to match the needs of their consumers with the needs of the local labor market. Training enhanced counselor's ability to interpret labor market information to assist their consumers to make informed career decisions and effectively work as a team with job placement staff. Counselors are better able to identify training and post—secondary education options that are in demand in the local labor market. Staff are aware of trainings available for high wage, high demand and high growth job opportunities for their visually impaired clients. DBVI will stay current in understanding the evolving labor market through collaboration with the Department of Labor.

4. Staff Development.

Describe the State agency's policies, procedures, and activities to ensure that, consistent with section 101(a)(7)(C) of the Rehabilitation Act, all personnel employed by the designated State unit receive appropriate and adequate training in terms of:

A. System of staff development

a system of staff development for professionals and paraprofessionals within the designated State unit, particularly with respect to assessment, vocational counseling, job placement, and rehabilitation technology, including training implemented in coordination with entities carrying out State programs under section 4 of the Assistive Technology Act of 1998; and

Staff Development: (A) A system of staff development with respect to assessment, vocational counseling, job placement and rehabilitation technology> The main objective in staff development at the Division for the Blind will focus on assessment, vocational counseling, job placement and rehabilitation technology in relation to visual impairment. Training for counselors will focus on the essentials of a comprehensive vocational assessment. This will address aspects of how a person with a visual impairment can access independence and achieve a high standard of independence. Our mission to, "support Vermonters who are blind or visually impaired in their efforts to achieve or sustain their economic independence, self—reliance, and social integration to a level consistent with their interests, abilities, and informed choice". Every year each DBVI employee meets with the division director to discuss their IDP (Individual Development Plan). Meeting's focus on how each employee can contribute to DBVI's goals and strategies; improve customer satisfaction; and support policies, philosophy, competencies and future vision. In addition, the purpose of the IDP is to ensure that each DBVI employee receive appropriate and adequate training to meet the professional standards and requirements of their position. Discussions with the DBVI director allow employees an opportunity to identify their career ladder. DBVI staff are given opportunities to take on higher level duties backed by participation in education and training programs. This can lead to a higher step grade as determined by the VT Department of Human Resources. DBVI has a partnership with the vocational rehabilitation Staff Development and Training Coordinator to get advice on upcoming trainings available within the Agency of Human Services and DVR. Needed trainings are determined through IDP developed by DBVI staff. DBVI staff are encouraged to participate in training opportunities to increase leadership, partnering and collaboration skills that lead to increasing employment opportunities for people who are blind and visually impaired. DBVI continues to expand projects directed toward our younger transition aged students and young adults. DBVI partners with the vocational rehabilitation Transition Program Director, the Department of Labor Planning and Support Administrator Youth Program Manager from the Workforce Development Unit, and the Agency of Education Program Coordinator. New initiatives to address services for students who are visually Impaired and to ensure they are receiving the PRE-ets core services. DBVI staff attended the annual Transition conference and the Core Transition Event seminar. Counselors are attending the regional Core transition meetings that offer opportunity to network with other service providers. DBVI counselors are active team members for the Core transition meetings and attend and provide information at IEP meetings for students age 14-21. DBVI will be working closely with Vermont DOL Youth case managers to support students with visual impairment. DBVI staff will provide training to DOL staff regarding adaptive skill instruction, orientation and mobility, rehab teaching and low vision training to assist with progressive employment. Together with DOL we will obtain statistical information concerning the labor market and job availability to match the needs of our future labor market. The project Great Expectations—Voices and Choices for the Future, Is a collaborative effort by DBVI, VABVI and VABIR. The purpose of the project is to increase employment skills and job seeking skills, promote positive mentoring, networking, obtain feedback from clients to improve services and to empower self—advocacy and self—reliance. This is accomplished through a series of planning meeting and seminars. The upcoming session will address Resilience and fears. DBVI will research and look at new ways to provide and increase services for

transition aged youth. DBVI staff receives ongoing training through local and regional in-state programs to stay current on: The National Library Services, Vermont Youth Conservation Corps, Deaf and Hard of Hearing Resources, Diversity and numerous others. DBVI staff is especially diligent about perusing pertinent journals and research and disseminating relevant articles and information via the internet, at monthly staff meetings and through in-person collaborations. The DBVI central office maintains subscriptions to several noted journals in the field (e.g., Journal of Visual Impairment and Blindness). Through attendance at combined meetings, in-service training, and direct staff contact DBVI continues to seek ways to improve and enhance collaboration with other agencies. Many DBVI trainings are in collaboration with the general Vocational Rehabilitation agency in the Department of Disabilities Aging and Independent Living (DAIL). DBVI has greatly enhanced its collaboration with other organizations to the benefit of this division. In particular, the LEAP program for summer youth employment is a model of cooperation. This involves DBVI (provider of consumers, funding), Vermont Youth Conservation Corps (infrastructure, staff), Resource (jobs, staff), Linking Learning to Life (follow-up, e-mentoring), VT Association for the Blind and Visually Impaired (IL training, transition staff) and the Gibney Family Foundation (funding). This is a unique residential program providing youth with vision impairments a summer employment opportunity, a community service experience and an independent living experience in an urban setting and a new option for a wilderness setting. DBVI is active with the Job Development Coalitions throughout the State of Vermont because of our work with Vermont Association of Business Industry and Rehabilitation (VABIR). VABIR staff set up trial work experiences and on the job trainings. They explain financial incentives and ADA information. This program helps to provide a service to employers for long lasting job matches.

B. Acquisition and dissemination of significant knowledge

procedures for the acquisition and dissemination of significant knowledge from research and other sources to designated State unit professionals and paraprofessionals.

Acquisition and dissemination of significant knowledge from other sources. DBVI uses a management model developed by Robin Lawton. This model supports a strong belief and process for a "Customer Centered Culture". With training, guidance and consultation from Robin Lawton, DBVI continues the process of looking at customer satisfaction and organizational performance. When using this method of management, it helps us to identify the "voice of the customer". DBVI has incorporated this model of management into our service delivery. Training has been provided to our SRC, the Vermont Association for the Blind and Visually Impaired and the DBVI staff. The main dimensions of the model are: Focus on the customer, eliminate ambiguity, include customer priorities, Empower the end user, define success, reduce ambiguity of language, Link customer and operational priorities, Integrate and leverage existing initiatives, focus on improvement, Address outcome first, process last, satisfy strategic objectives as well as operations, improve knowledge products first, Emphasize sustainability of new practices, and Challenge traditional assumptions. Using this model DBVI strives to improve customer satisfaction as we decrease ambiguity and improve communication. It allows a method to measure successful outcomes based on the "voice of the customer". This past year DBVI set up a town meeting to allow a process for hearing the voice of the customer. This allowed DBVI a way to collect and analyze information that is being used in the development of DBVI's strategic planning. Training and consultation provided by Robin Lawton allowed DBVI staff to improve a method for providing quality customer satisfaction and a higher level of performance. Using strategies from the Customer Centered Culture, DBVI created "Your Guide to Employment Services". The guide is a folder of information that is used during the Initial Interview with a customer. It contains customer friendly language that explains who we are, our process, examples of successful clients and the types of services that a person can expect from participating in the employment program. This welcome packet given to customers provides information to increase communication and clarity by finding a common language. DBVI uses input from our customers to ensure information is accessible, comprehensive, empowering, understandable and informative. DBVI continues to develop new tools and enhance the Guide to Employment Services. The DBVI team uses the Franklin Covey management when working together. "The 7 Habits of Highly Effective People", has been incorporated into the DBVI team management and it enhances effectiveness, responsibility, personal growth and vision. Our team building approach uses a win-win philosophy, which helps to increase understanding and communication. DBVI supports creative cooperation toward team building. Teams are more effective in analyzing, improving and providing services for people who are visually impaired. The DBVI Division Director is meeting with teams around the State to discuss personal and team vision statements. The 7 Habits of Effective People, and the Customer Centered Culture have a core similarity in that both emphasize "Start with the end in mind" or "Address outcome first, process last". Motivational Interviewing—DBVI has partnered with VR to provide training in Motivational Interviewing. Several staff have completed training session. This training allows an opportunity for staff to receive feedback and support using the counseling techniques used. DBVI attended a workshop to increase awareness of functional limitations for people who are visually impaired and best practice for working with our clients. Dan Norris from the Vermont Association for the Blind, Adult Services Supervisor and instructor at UMass Boston provided the instruction. He designed the training to address best practice to meet the learning needs of new staff and presented advanced material for more experienced staff. This training provides new staff with valuable information regarding environmental assessments for clients work sites and how to determine functional limitations. Information is presented on different types of visual diagnosis and how this impacts an individual's performance. Vermont Association for the Blind and Visually Impaired hosts an annual technology fair for DBVI professionals and DBVI clients. This is a hands-on opportunity to explore adaptive devices. Electronic magnification, computer software, illuminated canes, talking glucose meters, kitchen aids, hand held magnification, telescopic devices, writing aids and large print items will be demonstrated. This year DBVI staff attended the Northeast Chapter of the Association for the Education and Rehabilitation of the Blind and Visually Impaired (NE/AER). NE/AER supports professionals who provide education and rehabilitation to individuals with visual impairments. Information presented covers all areas of vision education and rehabilitation of clients, young and old. Areas covered are: Computer program, apps supporting Independent Living Skills, medical advancements, expanded core and common core curriculum for transition aged students, psychosocial aspects of vision loss, new approaches to teaching O&M skills. DBVI staff will continue to participate in trainings on relevant assessments needed for persons with visual impairment. These trainings will be presented by qualified vision professionals. Training will address new and relevant assistive technology for people who are blind and visually impaired and job analysis used to determine the need for a technology assessment and training. Ongoing consultation is available for staffs overall basic understanding of adaptive technology and how it can enhance an individual's job performance. Coordination and communication with low vision optometrists to enhance visual function in an employment situation is ongoing.

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5. Personnel to Address Individual Communication Needs

Describe how the designated State unit has personnel or obtains the services of other individuals who are able to communicate in appropriate modes of communication with or in the native language of applicants or eligible individuals who have limited English speaking ability.

Personnel to Address Individual Communication Needs Describe how the designated state unit has personnel or obtains the services of other individuals who are able to communicate in the native language of applicants or eligible individuals who have limited English speaking ability or in appropriate modes of communication with applicants or eligible individuals. The Division for the Blind operates under the State of Vermont Agency of Human Services. The Agency of Human Services has clear policy regarding access to programs as needed to ensure meaningful access to persons with limited English proficiency. Information regarding policy can be accessed at: <http://www.intra.ahs.state.vt.us/limited-english-proficiency> This policy applies to all Agency Departments, offices and employees. It is the policy of the Agency of Human Services to provide language assistance as may be needed to ensure meaningful access to our programs. Each department and offices will take steps to provide assistance so that persons seeking services may communicate effectively with program providers and with Agency and department staff. Departments must take steps to ensure persons seeking services are able to understand which services and benefits are available to them, and how they may best receive them. The LEP information provides resources and links to resources dealing with written, face-to-face and over the phone communication with individuals for whom English is not the primary language. DBVI is also able to use an agency contract for phone and written translation of almost any language in the world. DBVI makes use of an on-line contact for interpreters of ASL for those consumers who are deaf.

6. Coordination of Personnel Development Under the Individuals with Disabilities Education Act

As appropriate, describe the procedures and activities to coordinate the designated State unit's comprehensive system of personnel development with personnel development under the Individuals with Disabilities Education Act.

Coordination of Personnel Development Under the individuals with Disabilities Education Improvement Act 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 Improvement Act.

DBVI works in partnership with the Vermont Agency of Education, Division of Vocational Rehabilitation, and the Vermont Department of Labor. The development of the Unified State Plan ensures compliance with the Workforce Innovation Opportunity Act (WIOA). These steps ensure students with disabilities between the ages of 14-21 are receiving comprehensive and unduplicated services. DBVI is a partner on the Core Transition teams located in regions around the State of Vermont. DBVI counselors work closely with DVR Youth Transition Counselors, VABIR Youth Employment Specialists, Guidance counselors and Case managers to ensure that students on IEP are receiving Pre-Employment Transition Services and participating in activities as required in WIOA. DBVI works closely with the teachers of the Visually Impaired partially funded through the AOE and the School districts. The student receives training and adaptive equipment to be better prepared for participating in job exploration counseling, work-based learning and workplace readiness training. DBVI has access to program for students who are Visually Impaired through the LEAP program (Learn Earn and Prosper). In the LEAP program the students have an opportunity to learn about Self Advocacy and post-

secondary opportunities along with work-based opportunities, work readiness skills and learning about post-secondary educational opportunities. Student who are Visually impaired and at risk can work with counselors through Vermont Jobs Program., Students and their families can receive advocacy and education through the Vermont Family Network. DBVI provides trainings, work site accommodations, work experiences and education for students who are visually Impaired. The annual Core Transition Event is put together in partnership with DBVI, DOL, DVR, and AOE. Professionals gain increased knowledge and awareness of current practice and techniques that provide desired results for transition students through ongoing training, team collaboration and developing new initiatives.

j. Statewide Assessment

(Formerly known as Attachment 4.11(a)).

1. Provide an assessment of the rehabilitation needs of individuals with disabilities residing within the State, particularly the VR services needs of those:

A. with the most significant disabilities, including their need for supported employment services;

Summary Outline of CSNA Methods, Results, Gaps, and Implications for State Plan

The Rehabilitation Act, as amended in 1998, requires each state to conduct a statewide needs assessment every three years. The current triennial needs assessment is statewide and jointly conducted by The Division for the Blind and Visually Impaired (DBVI) and the State Rehabilitation Council (SRC). The activities for the comprehensive statewide needs assessment (CSNA) were completed during FFY 2016 - February 2018. The following summary of the CSNA is being used to develop many of our goals and strategies for PY 2019, 2020 and 2021.

Introduction

The goals of this needs assessment are to determine the vocational rehabilitation needs of individuals in Vermont who are blind or visually impaired.

Methodology

Information gathering included the use of:

- Existing disability population statistics including the Cornell Study;
- Disability population estimates from available data including the American Foundation for the Blind;
- Population projections and economic forecasts from federal and state data; Department Of Labor projections by state;
- Existing DBVI data, studies and experience; 911 data, type of service, cost, whether people currently served by DBVI are representative of the racial and ethnic minority distribution of people with disabilities within the state; data provided by CRPs; Counselor input;
- State level statistics from other federal programs; WIA, IEP, 504, Social Security,
- State and local data and reports;
- Stakeholder input: Surveys, focus groups, SRC meetings, interviews, Statewide Town Meetings, Customer—Centered Culture Focus Groups, and public hearings.
- Meetings and surveys with the statewide network of Teacher of the Visually Impaired.
- Statewide Customer Satisfaction and Needs Assessment Survey conducted by Market Decisions—winter 2017.
- Review of Journal of Visual Impairment articles by DBVI staff.

Participants included DBVI Staff, State Rehabilitation Council, Vermont Association for the Blind and Visually Impaired (VABVI) Staff, and individuals who are blind or visually impaired from around the state. Dissemination plans included group meetings and individual interviews.

Results

Current Population Survey

Prevalence Rate (Disability at the Vermont Population Level):The percentage of a man and a woman, aged 18-64 who report a work limitation in Vermont from 1981 (8.9%) to 2014 (10.1%)

Labor Market Activity Rate:The percentage of a man and a woman, aged 18-64 with a work limitation in Vermont who worked more than 52 hours in the prior calendar year from 1981 (53%) to 2014 (24%).

Employment Rate:The percentage of a man and a woman, aged 18-64 with a work limitation employed in Vermont from 1981 (40.8%) to 2014 (17.6%).

*VonSchrader, S., Lee, C. G. (2017). Disability Statistics from the Current Population Survey (CPS). Ithaca, NY: Cornell University Yang Tan Institute (YTI). Retrieved from Cornell University Disability Statistics website: www.disabilitystatistics.org

2016 Disability Status Report--Vermont

American Community Survey

Erickson, W., Lee, C., & von Schrader, S. (2016). 2016 Disability Status Report:

Vermont. Ithaca, NY: Cornell University Yang-Tan Institute on Employment and Disability (YTI).

www.disabilitystatistics.org

Summary of Overall Vermont Data

Age--In 2016, the prevalence of disability in VT was:

- 14.3 percent for persons of all ages

- <1 percent for persons ages 4 and under
- 6.2 percent for persons ages 5 to 15
- 8.6 percent for persons ages 16 to 20
- 12.0 percent for persons ages 21 to 64
- 23.4 percent for persons ages 65 to 74
- 48.3 percent for persons ages 75+

Disability Type--In 2016, the prevalence of the six disability types among persons of all ages in VT was:

- 2.3% reported a Visual Disability
- 4.4% reported a Hearing Disability
- 6.7% reported an Ambulatory Disability
- 5.5% reported a Cognitive Disability
- 2.9% reported a Self-Care Disability
- 6.0% reported an Independent Living Disability

Gender--In 2016, 13.9 percent of females of all ages and 14.7 percent of males of all ages in VT reported a disability.

Hispanic/Latino--In 2016, the prevalence of disability among persons of all ages of Hispanic or Latino origin in VT was 7.9 percent.

Race--In VT in 2016, the prevalence of disability for working-age people (ages 21 to 64) was:

- 11.9 percent among Whites
- 9.7 percent among Black / African Americans
- <1 percent among Asians
- 46.7 percent among Native Americans
- 14.1 percent among persons of some other race(s)

Populations in Households in Vermont

Content provided by the US Census bureau for the years 2010, 2011, 2012, 2013, 2014 and 2015.

<https://suburbanstats.org/population/how-many-people-live-in-vermont>

Ages 15 to 17=12,648

Ages 18 to 19=6,392

Ages 20=3,244

Ages 21=3,615

Ages 22 to 24=11,034

Number of Individuals who are minorities

Content provided by the US Census bureau for the years 2010, 2011, 2012, 2013, 2014 and 2015.

<https://suburbanstats.org/population/how-many-people-live-in-vermont>

Total population of Vermont= 625,741

White- 596,292

Two or More Races=10,753

Hispanic or Latino=9,208

Asian=7,947

Black or African=6,277

American Indian=2,207

Another Race=2,105

Three or More Races=610

Native Hawaiian=160

Summary of Visual Disability data in Vermont—American Community Survey

Is this person blind or does he/she have serious difficulty seeing even when wearing glasses?

Working Age Adults

DBVI estimates that there are approximately 7,100 Vermonters of working age (21-64) who are blind or severely visually impaired (meaning even with correction they are not able to easily read the newspaper). DBVI provides RSA defined services to approximately 5.3% of these individuals annually (293 in FFY17).

- **Visual Disability Total= 14,100 (2.1% of 619,100 VT population)**
- **Ages 5 to 15= 100 (6.4% of 75,800)**
- **Age 16 to 20= 80 (<1% of 44,000)**

- **Age 21 to 64= 7,100 (2% of 357,300)**
- **Age 65 to 74= 2,500 (3.6% of 68,500)**
- **Age 75 and Older= 3,400 (7.9% of 42,800)**

Employment Rate

Employment rates of non-institutionalized

Working-age people (ages 21 to 64) with disabilities in Vermont.

- In 2016, the employment rate of working-age people with disabilities in VT was 41.4 percent.
- In 2016, the employment rate of working-age people without disabilities in VT was 85.0 percent.
- The gap between the employment rates of working-age people with and without disabilities was 43.6 percentage points.

Gap--Employment Rate--Visual Disability

- The gap between the employment rates of working-age people with a visual disability (48.2%) and without disabilities (85%) was (36.8%) percentage points.
- This represents about 3,400 out of 7,100 working-age people with a visual disability who are employed.

Not Working but Actively Looking for Work

The percentage of non-institutionalized working-age people (ages 21 to 64) with disabilities in Vermont who are Not working but actively looking for work.

- In 2016 in VT, the percentage of working-age people with disabilities who were not working but actively looking for work was 5.5 percent.
- In 2016 in VT, the percentage of working-age people without disabilities who were not working but actively looking for work was 15.5 percent.
- The difference in the percentage of not working but actively looking for work between working-age people with and without disabilities was 10 percentage points.

Gap--Not Working but Actively Looking for Work--Visual Disability

- The difference in the percentage of not working but actively looking for work between working-age people with a visual disability (0.8%) and without disabilities (15.5%) was 15.42 percentage points.
- This represents about 296 people with a visual disability out of the 3,700 people with a visual disability who are working age not working but looking for work.

Working Full-Time/Full-Year

This section presents the percentage of non-institutionalized working-age people (ages 21 to 64) with disabilities working full-time/full-year in Vermont.

- In 2016, the percentage of working-age people with disabilities working full-time/full-year in VT was 27.0 percent.
- In 2016, the percentage of working-age people without disabilities working full-time/full-year in VT was 62.6 percent.
- The difference in the percentage working full-time/full-year between working-age people with and without disabilities was 35.6 percentage points.

Working Full-Time/Full-Year: Gap--Visual Disability

- The difference in the percentage working full-time/full-year between working-age people with a visual disability (24.8%) and without disabilities (62.6%) was 37.8 percentage points.
- This represents about 1,700 out of 7,100 people with a visual disability who are working Full-Time/Full-Year.

Annual Earnings

The median annual earnings of non-institutionalized working-age people (ages 21 to 64) with disabilities who work full-time/full-year in Vermont.

- In 2016, the median earnings of working-age people with disabilities who worked full-time/full-year in VT was \$44,300.
- In 2016, the median earnings of working-age people without disabilities who worked full-time/full-year in VT was \$44,500.
- The difference in the median earnings between working-age people with and without disabilities who worked full-time/full-year was \$200.

Gap--Annual Earning--Visual Disability

- The difference in the median earnings between working-age people with a visual disability earned \$50,400 and people without a disability earned \$44,500 showing that people with a visual disability earned \$5,900 more annually than people without a disability.

*Caution: Estimates bases on a very small sample size (less than 40 individuals).

Poverty

The poverty rates of non-institutionalized working-age people (ages 21 to 64) with disabilities in Vermont.

- In 2016, the poverty rate of working-age people with disabilities in VT was 21.2 percent.
- In 2016, the poverty rate of working-age people without disabilities in VT was 8.6 percent.
- The difference in the poverty rate between working-age people with and without disabilities was 12.6 percentage points.

- **Gap—Poverty—Visual Disability**
- The difference in the poverty rate between working-age people with a visual disability (27.9%) and without disabilities (8.6%) was 19.3 percentage points
- This represents about 2,000 people with a visual disability out of the 7,100 people with a visual disability who are working age that live in poverty.

Education Level

- Less than High School=800 (11.9% of 7,100)
- A HS diploma or equivalent=3,600 (50.4% of 7,100)
- Some college/associates degree=1,500 (21.1% of 7,100)
- **College Bachelor Degree=1,200 (16.5% of 7,100)**

Gap—Education Level--Visual Disability

- **A majority of individuals with a visual disability do not get a college degree.**

Information about DBVI agency resources:

DBVI currently has a total of 10 staff including four Vocational Rehabilitation Counselors and two Associate Counselors. DBVI collaborates with CRPs including The Vermont Association for the Blind and Visually Impaired and The Vermont Association for Business, Industry, and Rehabilitation; and Supported Employment programs (i.e. Developmental Services Agencies and Mental Health programs).

The type, percentage, and cost of services provided by CRPs to individuals who are blind or visually impaired and who are minorities.

- DBVI contracts with the Vermont Association for Business, Industry, and Rehabilitation to provide job development services for DBVI customers in all four regions of the state (\$60,000 annually).
- DBVI customers have access to supported employment services through an agreement with the General VR agency to access those programs as needed. In 2017, 8 DBVI customers participated in supported employment programs.
- DBVI contracts with the Vermont Association for the Blind and Visually Impaired for Low Vision, Rehabilitation Teaching, and Orientation and Mobility services (\$175,000 annually).

Customer Satisfaction Data—Key Findings and Discussion

Statewide Survey

The survey instrument for this research was developed jointly between the Vermont Division for the Blind and Visually Impaired and Market Decisions Research. It is based on question topics that Market Decisions Research has used in conducting satisfaction research among Vocational Rehabilitation consumers in six states. The goal of this research was to provide an accurate assessment of the views of consumers that could be used to assess satisfaction with services with VT DBVI overall. The target population for this research consisted of all consumers with open and closed cases.

Goals:

- The Customer Quality Assurance Survey and Needs Assessment is designed to allow customers to provide feedback about the services they have received.
- The survey provides a tool to measure satisfaction with the agency and the services provided.
- The survey is designed to gather information to allow quality improvements.
- This administration allows comparisons to the 2003, 2011, and 2015 research and the opportunity to see trends in customer satisfaction.

Executive Summary

Consumer Core Metrics:

- Overall Satisfaction and Expectations: 82
- Experience with Services Provided by DBVI: 83
- Experience with DBVI Staff and Counselors: 93
- Communications with DBVI Staff: 88
- Consumer Control and Involvement: 86
- Outcomes and Meeting Goals: 85
- Ease of the Application Process for DBVI Services: 88
- Accessibility of the DBVI Office: 87
- Satisfaction with Current Employment: 85
- Recommend VT DBVI: 98
- Experience Problems with VT DBVI: 89

New Skills and Knowledge

- The most commonly received service from VT DBVI was adaptive equipment (67%). This was also the service consumers most frequently found most helpful (45%)

- The most well-known services offered in other places that consumers thought VT DBVI needs is additional training opportunities.
- 92% of consumers are satisfied with the choice of services available.
- 85% of consumers think DBVI delivers services to them well.
- 89% of consumers are satisfied with the choice of service providers.
- 90% of consumers are satisfied with their choice of a vocational goal.
- 88% of consumers are satisfied with the information they have been given about the choices they have.

Attitudes and Opinions

- 92% of consumers are satisfied with VT DBVI's program overall.
- 94% of consumers are satisfied with their involvement in their DBVI experience.
- 11% of consumers experienced some problem with DBVI or the services provided to them.
- The problems most commonly being experienced are not receiving employment (37%) and not receiving help in reaching plan or goals (29%).
- Among those experiencing problems with DBVI or the services provided, 59% indicate that DBVI worked to resolve those problems.
- The most common sources of improvement offered by consumers is more training (14%) and increases in staff (8%).
- The most commonly sought need to address is for more transportation and drivers for all of consumers' needs.
- Consumers are most likely to place the blame for unmet needs on funding issues (28%).
- Most DBVI consumers believe that the unmet needs could be solved by providing more staff (23%) or better information being made publicly available (21%).

New Behaviors and Circumstances

- 81% of consumers agree that the DBVI services they received helped or will help them become more financially independent.
- 88% of consumers feel that the DBVI services they received helped them or will help them become more independent, in general.
- 84% of consumers feel the DBVI staff helped or will help them reach their job goal.
- The new skills consumers are most likely to report are computer and technology use skills (23%).
- The most commonly reported assistive technology skills learned are computer/technology skills (22%).
- 54% of consumers are working full or part time.
- The service that working DBVI consumers are most likely to believe helped them get or keep their job was job coaching and support (28%).
- Asked what worked best in helping them prepare for their job, consumers are most likely to say adaptive equipment and counseling.
- 91% of working consumers are satisfied with their current job.
- Jobs in education are most in demand among DBVI consumers not currently employed (15%).
- Among those not working, help in finding a job (3%) is the most commonly reported service consumers need and where not receiving.

Treatment by VT DBVI

- 94% of consumers feel the staff of DBVI helped or is helping them achieve their DBVI goal.
- Almost all (91%) consumers report that the DBVI office is accessible for someone with their type of disability.
- Nearly all consumers (95%) feel the DBVI staff treats them with dignity and respect.

Actions Meeting Standards

- 83% of consumers got the results they wanted from DBVI.
- 92% of consumers felt that the services provided by VT DBVI met their expectations.
- 90% of consumers felt that the services they received from VT DBVI compared well to their ideal program.
- 98% of consumers would tell their friends with disabilities to go to the DBVI program for help.
- 93% of consumers agree that they are better off as a result of the services received from DBVI.

Timeliness of Action

- 92% of consumers are satisfied with how long it took their counselor to answer questions and address concerns.
- 95% of consumers indicate that it is easy to contact their DBVI counselor.
- 91% of consumers feel that services are provided as promptly as necessary.

Other Items

- 96% of consumers found it easy to complete an application for DBVI services.
- **64% of consumers have been informed they could address problems with Division for the Blind and Visually Impaired, and that they could address it with the Client Assistance Program.**

- **Key Findings**

Summary

The overall conclusion that can be drawn from this research is that a large majority of consumers are satisfied with the Vermont Division for the Blind and Visually Impaired (DBVI), satisfied with the services they receive, and only a small fraction have experienced any problems. This reaffirms the findings from prior studies conducted between 2003 and 2015.

The staff of DBVI is viewed as helpful and interested in meeting the needs of their consumers. Staff effectively communicates with their consumers and staff also engage with their consumers during the process. Staff listen to consumers when determining goals and the large majority of consumers indicate that DBVI provided the necessary assistance to help them achieve their goals.

Based upon the views and attitudes of the large majority of consumers, the survey results did not identify any major problems with the Vermont Division for the Blind and Visually Impaired or the services it provides.

Looking at the positive highlights, the vast majority of consumers are positive about:

- Their overall experience
- Believe that DBVI met their expectations
- Have a positive experience with the services provided by DBVI
- Have a positive experience with DBVI staff and counselors
- Feel they are part of the process in setting goals
- Have positive outcomes, and
- Nearly universally recommend DBVI to others.

While positive, the survey results do show a slight drop from the 2015 survey. The declines observed are small but occurred across nearly all metrics. This suggests there are factors having a slight negative impact consumer experience. In reviewing consumer feedback, the most commonly mentioned issues or concerns are in the areas of:

- Issues communicating with staff or counselors, difficulty reaching staff or counselors
- Difficulties with paperwork and forms, needing help in completing forms, needing alternate formats
- Difficulties in finding employment, few job options
- Waiting to receive services, have not received services
- Needing more support or services, having to fight to obtain services, needing more guidance

Pre—Employment Transition Skills Planning

Includes:

- **Statewide Survey of all Teacher of the Visually Impaired**
- **Statewide survey sent to all students and families.**
- **Data-Mapping of Child Count data.**
- **Mailing to all special education and 504 administrators**
- **Calculation of current Pre-ETS Expenditures and Forecasting of future needs.**

Statewide Survey of all Teachers of the Visually Impaired in Vermont--Survey open from November 2017 through December 2017.

What needs do your students have in job exploration counseling?

Most Popular Responses:

- Exposure to jobs in their community
- Receiving hands on experience as to how jobs are performed
- Meeting other employed adults with similar impairments

Key Answers:

- "Knowledge of actual jobs, the opportunity to "see" (hands on) how jobs are performed, the opportunity to understand how assistive tech and strategies can allow them to do jobs successfully. Meeting other adults with visual impairments who are working is also helpful"

In your experience, what skills do students need to be prepared for work experiences?

Most Common Responses:

- Social Skills (How to ask questions, making friends, etiquette, grooming etc.)
- Personal Communication skills
- Time management
- Technology
- Lots of range of answers

Key Answers:

- "Time job shadowing with HANDS on experience... Social skills, constructive criticism, making friends, etiquette, grooming, problem solving (not waiting for others to step in), assertiveness, transportation options, assistive technology, handling

downtime appropriately, annual resume writing and updates. Understanding and identifying the list of job skills needed WITHIN each job.”

How are your students' strengths and weaknesses currently assessed in the area of work-**based** learning?

Most Common Responses:

- Skill Inventory Checklist/ Job Readiness Checklist
- Observation/Evaluation of students by teacher and employer

Key Answers:

- “We were just given a readiness list, but other list are also out there in the areas of independent living, social skills, technology, etc. APH has a book on assessment and goals toward transitioning students successfully as well. I currently have students in middle school and under, and I have not been using a formal list with my current students. I definitely need to be thinking more about this with my middle schoolers though it really starts in the younger years with exposure and experiences.”

What would help your students learn more about post-secondary options? Is there anything DBVI could do in order to help?

Most Common Responses:

- Have students meet with TVI and DBVI staff to discuss options
- Have DBVI organize college visits and gatherings with current college students
- Connect with families
- Put together overnight experiences like LEAP, but held more often and for high school students only

Key Answers:

- “What would be helpful is if DBVI put together a series of overnight experiences - like the leap retreat weekends but even quicker, and more often for students in 10-12 grade. Small but frequent experiences where our students could get together more frequently while being exposed to work experiences - like an overnight where all the 10-12 graders then go and do different job shadows, and then get together in 8 weeks and switch job shadows, and learn the routes, be exposed to different access tools, spend time socializing, and then using social skills at the job sites. Some jobs could be a professor at UVM, various food service employees, computer programmers, staff at echo museum, financial industry, social work organization, etc..”

What skills do your students need to be prepared for post-secondary education?

Most Common Responses:

- Organization
- Daily living skills
- Technology
- Advocacy Skills

Key Answers:

- “The same ones as regular students plus advocacy, exposure to applications and how to find resources on line to assist them. The opportunity to practice some problem solving situations ahead of time.”

What do your students need to get ready for employment?

Most Common Responses:

- Advocacy Opportunities
- Social skills
- Professional skills (Interviewing, dressing for work, office skills etc.)
- Confidence

Key Answers:

- “Opportunities to perform jobs. Training around how to go about getting the training necessary to obtain a paying job in the community, communication skills training, conversational skills training, personal care skills training, etc.”

What job readiness skills do you think your students need to succeed in the workplace?

Most Common Responses:

- Often, people referred back to their answers from previous question

Do your students receive the help needed to advocate for themselves? Why or why not?

Most Common Responses:

- Most respondents indicated that their students receive some advocacy training or are made aware of some program available. The issue is having the students take advantage of said programs or continuing their training through high school.

Key Answers:

- “Yes they need help to advocate for themselves. "Self Determination" is one of the 9 Expanded Core Curriculum bullets. It takes a village, Most students come from overprotective and/or dysfunctional families so they depend on the school staff and outside sources to help guide them.”

Is there anything you would like to see DBVI do with self-advocacy services?

Most Common Responses:

- Educating Parents, form a parents group
- Work with students and parents directly
- Create a progress checklist
- Run workshops

What services have been successful for your students? Why?

Most Common Responses:

- Camps, get togethers
- CCS, Howard, LEAP, HAPI
- Job placement services
- Work experiences and assistive technology consultations.

Key Answers:

- "The arrangement of work experiences, and assistive technology consultations have been beneficial for several of my students. Direct engagement with students outside of the school setting has also been instrumental in moving students forward with their transition planning."

Where are there gaps in services?

Most Common Responses:

- Inconsistent coverage of job coaches for students
- Opportunities to get together across the school year
- Persistence of being in contact with school based personnel
- Not many outlets for real job experience
- Funding for personal transportation
- Time, not enough time to do everything
- Assistive Technology
- Daily living skill services

Key Answers:

- "Time. We need to actually identify transition specific objectives in the IEPs or more transition specific objectives per school year. 24 hours is a day is not long enough. Students with a VI need an extra 13th year of schooling in most of the 9 Expanded Core Curriculum areas"
- "Based on conversations I have had with parents the most challenging thing seems to be the inconsistent coverage of job coaches for students who need extra support in the community or at work"
- "There are certainly no obvious caps and services. However, funding for personal transportation expenses and access to efficient transportation remains a challenge in our largely rural community."
- "I think DLS instruction beyond what a TVI is able to do could start even earlier."

Statewide Survey of Families

In fall 2017 DBVI sent a survey to all visually impaired students and families in high school. The questions included their needs for the 5-core Pre-ETS activities. These results helped DBVI with outreach to all individuals including those who are underrepresented or minorities. The survey also included a letter that explains DBVI intent to assist students with career planning and finding work experiences. It also described the summer work experience LEAP program and school year retreats and workshops.

Statewide Focus Group Meeting (Included DBVI consumers and several SRC Members).

In January 2018 DBVI held a statewide focus group as part of the CSNA. The focus group included representation from all regions of the state. The event had two main objectives. First, to ask participants "What is working well and what else is needed to help people who are blind or visually impaired teach their employment and independence goals?" The other goal was to have an in-depth opportunity for each participant to share with the group the IOS apps that are most useful for their employment and independence.

DBVI Questions and Notes

As you think about employment, what can you think of that DBVI can do to help with that?

- Tech training
- The ability to spend more time with individuals to do something consistent over a period of time and be proficient with certain skills
- People get their feet wet, but they don't really remember when they are seeking employment
- There is room for more training
- As technology gets better, people need to become more informed
- Quarterly Newsletter
- This has been updated
- This is what's new

- Tech Listserv (E-mail and contribute to constantly and peer to peer)
- Podcasting
- VPR has been teaching people about podcasts
- DBVI needs to find a way to have the trainers become more adept at being innovative within a person's domain for possible low-tech solutions.
- Using the things around them to solve a problem
- Don't constantly throw technology at something
- Try to make things easier to use without always have to pull up an app
- Have DBVI find some training or encouragement for instructors to learn more ways in helping people find their own solutions
- Increase tactile knowledge and stuff like that
- Adapting to what you have
- Perkins School Program to Learn More Adaptive Knowledge

How do we share low tech solutions?

- Listserv Idea
- Peer to Peer Connecting
- It's hard for people to find a way to get where they need to be
- "There's a canyon between me and a job"
- I want to meet people who can help me

What DBVI can do about outreach?

- Need to advertise more
- Department of Human Resources

How can DBVI reach underserved populations?

Issues

- Transportation
- No actual job to go to necessarily
- WIOA could change this
- Radio PSAs
- Podcast
- VABVI (Video Clips "How I Do It")
- Contact the legislator for more BEP sites.
- Get more BEP training sites in the state.
- More connection with Department of Labor contacts
- A launching place for subcommittees and meetings
- Getting connected with other entities and organizations

Pre-Employment Survey of Students who participated in the Summer 2017 LEAP Work Experience Program

What do you think will help you the most with reaching your employment goals?

- More experience in the field that I want and great organization skills.
- Work experience, positive attitude.
- Learning how to make and build a better resume than what I already have.
- I think working closely with my DBVI counselor and being as open and honest as possible with employers in regards to my disability and possible limitations.
- I think going to college would help me reach my employment goals, so I can figure out exactly what my employment goals are.
- Learning more about Assistive Technology.
- Professional development Friday's really helped me with interview skills and how to format my resume.
- I think more individualized training, particularly in technology (working with JAWS).
- Having a reliable list of references so that they can give a good recommendation for jobs that I may be applying to in the future.
- Being more responsible, and getting the accommodations I will need will help me be successful.
- Finding better ways to access accommodations in the work place - both in tools to use and ways to advocate.
- Making good contacts/networking. I was able to meet someone (Heather B) who may be able to help me get into the job field that I want to go into. I want to learn from people like her.

- Researching and making sure I have the necessary skills needed for the certain job. Different accommodations and making sure I'm aware of the different services I receive.
- I think practicing interviews and learning about interviews will help me in the future.

What are your needs in relation to your employment goals?

- Better public speaking skills, better organization skills, and learning about other music.
- Leadership skills. Working skills.
- I need to work on not influencing people around me and I need to become a better role model.
- My needs really depend on the job and expectations of me in that particular position. I need to be allowed to use all assistive technology in the workplace and often require extra time and patience in order to complete certain tasks, particularly if it involves a lot of reading or computer work.
- I need to learn how to budget my money well. I also need help on my time management skills.
- Getting more comfortable with using Assistive Technology (I.e. Voiceover on Mac).
- I need support and good accommodations from the future employer.
- I think I am lacking in technology training, or the fact that I haven't stepped completely out of my comfort zone yet, in terms of being more independent and proactive.
- I might need extra time to learn what to do at a new job, in order to perform well.
- I'll need a job coach for a little bit.
- I need to live in an area where there are more entry-level positions for people under 18.
- I will need some adaptive equipment to get into the medical field. I will also need to learn computer program to help me succeed.
- Making accommodations and making sure the employer know that I have different needs compared to sighted person. I will need to use my phone in order to read certain things, such as labels and or different documents.
- My needs are accessible technology and for my employers to know my different needs. I will also need more training on how to take public transportation.

What do you feel is getting in the way of reaching your employment goals?

- More practice with public speaking.
- I feel as though I'm the only one standing in the way of my goals, but that can be sad for all life. I can be a difficult person to change and I need to learn the changes the best thing in some cases.
- Outside of LEAP, I have not been employed. I think my biggest obstacle currently is my lack of experience in the workforce, very evident on my short resume.
- I think a couple things are procrastination and not having enough motivation are two of them.
- My vision is a barrier because of other peoples' perceptions and how they decide to interpret my abilities.
- Trying to explain my disability to some employers because I think a lot of employers may think of us as a liability.
- Not having a college education, and not knowing how to get a job on my own because I need assistance for that.
- Age is getting in the way of getting a job (they say I must be 18 or older) and also disability discrimination in general.
- People opinions of the blind community is getting in the way. I hear a lot "you can't do that" or "no one wants a blind nurse." I feel that people with visual impairments are thought of as less capable.
- I can't think of anything that's getting in the way because I haven't applied to any jobs, and I'm still in high school. Transportation is the only thing I can think of as being an issue but that's not anything I can't work around.
- My learning disability and the fact that I take longer to grasp information gets in the way of me reaching my employment goals.

Journal of Visual Impairment and Blindness JVIB Articles

The highlights of previously cited in CSNA articles are cited here because they are still relevant. Please refer to the previous CSNA for a more complete summary. Several JVIB article are new and include more complete summaries below.

The previous CSNA (FFY 15) referenced several Journal of Visual Impairment and Blindness (JVIB) article that have identified several "Needs" of people who are blind or visually impaired related to students and employment. Here are some of the main highlights:

Transportation:

- The most frequently cited barriers for visually impaired individuals regarding transportation are: the availability of public transportation, travel time, cost, safety issues, and stress associated with transportation.
- Engage clients in problem-solving discussions to generate transportation options; sharing of client success stories and innovative strategies implemented to overcome transportation barriers.
- In an effort to continue to support consumers around transportation issues DBVI could survey consumers to obtain information on effective transportation solutions and share with other consumers. Showcase success stories on creative transportation solutions.
- Participating in efforts to improve the overall transportation system.
- Providing consumer's transportation expenses for at least 60 days after the Customers are employed.

- Encouraging customers to relocate (when needed) and network with co-workers and community agencies to hire drivers.
- Encouraging customers to car pool, meet somebody, post messages on bulletin boards, run an ad in the newspaper and try to find somebody in community.

Employer Attitudes/Educating the Public:

- Disability awareness training and assistive technology were two of the top five strategies identified by employers that would be helpful in hiring persons with disabilities.
- There are multiple theories about how attitudes are formed and changed, and many of them propose a link between knowledge and attitudes.
- What level of knowledge do employers have about how someone who is blind or visually impaired can perform specific job functions (that is, knowledge about job accommodations or available assistive technology)?
- Do employers know where to seek help with accommodating someone who is blind or visually impaired?
- In an employer survey a majority of managers mistakenly believed there were few jobs in their organizations that visually impaired people could successfully perform. They also thought it was more expensive to hire someone with impaired vision compared to someone without a disability. The majority of managers made it a lower priority to recruit, train, and retain employees with disabilities than to recruit, train, and retain executives, senior managers, young employees, and minorities.
- Involving the employer in advocating for the creation, modification, or expansion of transportation programs. Systems change when employers also advocate for more transportation options.
- Providing education to employers and human resources professionals about job accommodations, including where to find additional information, is necessary and would be an appropriate strategy to use when interacting with employers.
- Encouraging job seekers to volunteer information about how they perform specific activities and their transportation options. Answering the unasked question is important because what the employer is imagining probably is not accurate.
- Educating employers about visual impairment and how it affects functioning.
- Creating opportunities for increased contact between employers and persons who are visually impaired.
- Sharing testimonials and newspaper articles of success stories.
- Doing presentations each month to describe the whole process and the benefits of hiring a blind person.
- Offering training about the Americans with Disabilities Act to employers.
- Providing community education days.
- Facilitating educational activities particularly targeted for October because it is National Disability Awareness Month.
- Taking tours and publicly recognizing businesses that employ visually impaired persons.
- Facilitating employer mentoring programs and breakfast meetings.
- Developing long-term relationships with employers, particularly those with large businesses.
- Sharing success stories about competent blind people on the job and publicize them in many ways. Include consumer organizations in these efforts.

Soft Skills/Interviewing Skills

- Making sure everyone has practice interviews so the person is ready.
- Making sure DBVI customers are competent in discussing their skills, qualifications, and visual impairment with employers.

Assistive Technology

- Access to assistive technology
- Providing high-quality training in adaptive skills and assistive technology are vital aspects of preparation for employment.

Progressive Employment

- The need for a transitional period to full-time employment during which they engage in progressive employment including volunteer work, part-time work, work experiences, or on-the-job training.
- Providing on-the-job training programs and job coaches to promote positive integration into the workplace.
- Finding ways to keep valued older employees.

Benefits Counseling/Guidance

- Fear of losing benefits.

Peer Support/Job Clubs

- Creating job clubs for promoting appropriate work behavior and increasing knowledge about employment options.
- Promoting peer support as a powerful force in assisting DBVI customers through the training and employment process.

Adjustment to Blindness

- Individual adjustment to blindness

Additional recent JVIB articles relating to "Needs" of Blind or Visually Impaired related to Employment include:

Cmar, J. L. (2015). Orientation and Mobility Skills and Outcome Expectations as Predictors of Employment for Young Adults with Visual Impairments. Journal of Visual Impairment & Blindness, 109(2), 95-106.

- Cmar analyzed data from the National Longitudinal Transition Study to assess the relationship between orientation and mobility, post-secondary education, and employment for persons who are blind and visually impaired. The study revealed that, "...youths with high ratings on community travel skills were significantly more likely to be employed up to six years post- high school," (p. 102). The author concluded that their results, "...suggest that independently traveling to places outside the home, using public transportation, and arranging airplane or train trips are predictive of later employment for adolescents with visual impairments. These experiences can be facilitated through avenues such as off-campus O&M [Orientation and Mobility] instruction, transition programs, and summer programs, and can be further supported by family involvement," (p. 103).

Crudden, A. (2015). Transportation issues: perspectives of orientation and mobility providers. *Journal of Visual Impairment & Blindness (Online)*, 109(6), 457-468.

- Crudden conducted an exploratory study of orientation and mobility providers' perceptions of transportation issues facing blind and visually impaired individuals. The author found that transportation is a major barrier for people who are blind and visually impaired, especially in terms of employment. "Participants unanimously agreed that transportation has a significant negative impact on the employment of persons who are visually impaired," (p. 461).

Crudden, A., Antonelli, K., & O'Mally, J. (2017). A Customized Transportation Intervention for Persons with Visual Impairments. *Journal of Visual Impairment & Blindness*, 111(4), 341-353.

- Crudden et al. evaluated a customized transportation intervention program for people who are blind or visually impaired. The study consisted of a pretest and posttest of participants' social problem-solving skills, transportation self-efficacy, and transportation knowledge. Participants were measured against a comparison group of blind and visually impaired persons not undergoing the intervention. The authors found that, "The intervention group scored higher than the comparison group on all measures at posttest, and trends in all cases showed that the intervention group improved more from pretest to posttest than the comparison group," (p. 350) and concluded that, "These results lend support to the necessity and benefit of engaging consumers in structured transportation planning discussions and activities," (p. 351).

Crudden, A., McDonnall, M. C., & Hierholzer, A. (2015). Transportation: an electronic survey of persons who are blind or have low vision. *Journal of Visual Impairment & Blindness (Online)*, 109(6), 445.

- Crudden et al. conducted a nationwide survey of blind and visually impaired persons around issues related to transportation. Survey respondents did not identify transportation as a primary barrier to employment. However, the authors note: "... just over half of the persons who described themselves as self-employed, unemployed, retired, students, or volunteers reported that lack of transportation limited their participation in employment. More than one third of participants reported having turned down jobs because of transportation concerns," (p. 452). The authors concluded that while transportation remains a major barrier to employment for blind and visually impaired persons, the concern within that community is with the obstacles transportation creates for leisure, daily living, and community engagement.

Ehn, M., Möller, K., Danermark, B., & Möller, C. (2016). The Relationship Between Work and Health in Persons with Usher Syndrome Type 2. *Journal of Visual Impairment & Blindness (Online)*, 110(4), 233-244.

- Ehn et al. investigated work and health in people with dual sensory loss through Usher syndrome. Results showed that individuals with Ushers syndrome who were employed enjoyed significantly better health than those who were in receipt of disability assistance funds. The authors concluded that, "...there is a need for early interventions supporting persons with USH2 [Ushers syndrome] by means of vocational training and other work-promoting activities instead of granting them a disability pension, since in the long term employment may make the difference between good and bad psychological health," (p. 242).

Hierholzer, A. C., & Bybee, J. (2017). Working with Randolph-Sheppard Entrepreneurs Who Are Deafblind: A Qualitative Analysis. *Journal of Visual Impairment & Blindness*, 111(1), 61-71.

- Hierholzer and Bybee examined challenges to deafblind entrepreneurs and staff involved with the Randolph-Sheppard Enterprise Program. The authors conducted interviews with staff and deafblind entrepreneurs. Their findings suggest that the largest challenge to deafblind entrepreneurs was communication with customers. The authors conclude that, "Although communication is a challenge, neither deafblind entrepreneurs nor BEP [Business Enterprise Program] staff view communication challenges as insurmountable barriers. Individuals with deafblindness can succeed as BEP entrepreneurs if they are provided with updated technology, notify customers about the best ways to communicate with them, and keep a positive, upbeat attitude when interacting with customers," (p. 70).

Högner, N. (2015). Psychological stress in people with dual sensory impairment through Usher syndrome type II. *Journal of Visual Impairment & Blindness (Online)*, 109(3), 185-197.

- Högner evaluated questionnaire responses to investigate psychological stress in people with dual sensory loss through Usher syndrome. Their findings indicated that respondents had high levels of stress and identified orientation and mobility, chronic worry, and social isolation as the leading factors in the development of stress. Högner concluded that, "...it is important to offer services to people with USH [Usher syndrome] that enable them to participate in society," (p. 195). Further, the author highlighted the importance of employment rehabilitation for people with Usher syndrome.

McDonnall, M. C., Crudden, A., LeJeune, B. J., Steverson, A., & O'Donnell, N. (2016). Needs and Challenges of Seniors with Combined Hearing and Vision Loss. *Journal of Visual Impairment & Blindness*, 110(6), 399-411.

- McDonnall et al. surveyed seniors with combined hearing and vision loss to identify needs and challenges. The survey demonstrated that transportation, technology training, assistance with errands, and improved communications were the top reported needs for seniors with dual sensory loss. Needs for early onset of one or both sensory losses focused on transportation and use of technology. The authors emphasized the importance of technology training for seniors with dual sensory loss as it can, "...contribute to overall improved quality of life, since it has the potential to improve communication options and reduce feelings of isolation," (p. 399).

O'Mally, J., & Antonelli, K. (2016). The Effect of Career Mentoring on Employment Outcomes for College Students Who Are Legally Blind. *Journal of Visual Impairment & Blindness*, 110(5), 295-307.

- O'Mally and Antonelli conducted a nationwide longitudinal study to evaluate career mentoring outcomes for blind college students. Their findings demonstrated that, "Students working with mentors were significantly more assertive in job hunting and showed trends in improvement for job-seeking self-efficacy and career adaptability. Despite these positive trends, however, the mentoring relationship did not have a significant influence on employment rates and job satisfaction," (p. 303).

The authors conclude, "Our results indicate that mentor relationships are effective in improving jobseeking assertiveness for legally blind college students. Trends indicated that improvement may also occur in areas of self-efficacy and career adaptability and, perhaps with a longer mentoring period, significant gains would be seen in these areas as well," (p. 304).

O'Mally, J., & Steverson, A. (2017). Reflections on Developing an Employment Mentoring Program for College Students Who Are Blind. *Journal of Visual Impairment & Blindness (Online)*, 111(3), 271-276.

- o O'Mally and Steverson (2017) reported on an employment mentoring program for blind college students. The program involved matching mentors and mentees to facilitate job shadowing, networking, job-seeking skills, and finding transportation. The authors found that this type of program, "...demonstrates the desire among students with visual impairments and professionals to work with others in pursuing employment," (p. 275). O'Mally and Steverson conclude that future mentoring programs might benefit from, "...broadening eligibility to include college students of nontraditional ages and those who are in the earlier stages of post-secondary education," (p. 275). Further, the authors highlight the need for service providers to encourage students to pursue these types of opportunities and emphasize the development of, "...realistic views of securing employment," (p. 275).

Victor, C. M., Thacker, L. R., Gary, K. W., Pawluk, D. T. V., & Copolillo, A. (2017). Workplace Discrimination and Visual Impairment: A Comparison of Equal Employment Opportunity Commission Charges and Resolutions Under the Americans with Disabilities Amendments Act. *Journal of Visual Impairment & Blindness*, 111(5), 475-482.

- o Victor et al. analyzed workplace discrimination cases concerning persons who are blind or visually impaired. Several trends were identified in these cases, including: a decrease in job acquisition charges, an increase in job satisfaction charges, and an increase in job retention charges. The authors note: "Workplace discrimination experiences were most prevalent with aspects regarding job satisfaction, which includes issues with reasonable accommodations," (p. 480). The authors highlight the need for vocational rehabilitation service providers, "...to be aware of and knowledgeable about assistive technology, adaptive communication, and independent living devices that could supplement or enhance the capabilities of individuals to perform essential job functions needed for successful employment," (p. 480). Further, the authors urge vocational rehabilitation providers to be knowledgeable of federal and state laws governing workplace discrimination and to provide one-on-one support to blind and visually impaired professionals throughout the employment process.

Nearly all DBVI consumers are considered to have a most significant disability. The CSNA included many of these individuals in focus groups, interviews, and customer satisfaction surveys to determine their employment needs. The findings from all of these assessment methods plus a review of the JVIB research show some major categories of need. They include needs for training and work experiences that lead to good jobs, adaptive skills training, and assistive technology computer training. There is also a significant need to educate employers about the abilities of people who are blind.

DBVI has strong partnerships for individuals who need supported employment. Eligible consumers can access programs through the Developmental Services Agencies. DBVI strives to have all individuals participate in trial work experiences using supported employment when appropriate.

B. who are minorities;

The CSNA assessment data show the Vermont demographics. It shows that people are spread throughout our rural state and are not necessarily living in certain communities. The exception is Burlington which has the most diverse population in Vermont. These data guide our outreach efforts and indicate a need for DBVI to outreach to all communities. The most challenging region for outreach is the Northeast Kingdom which is very rural. The CSNA indicated a need to do more public outreach on the radio using a Public Service Announcement across the state.

The DBVI Director is also a member of the Agency of Humans Services Committee to make sure the agency is accessible to all individuals. Several initiatives of the group include sharing resources about translation services and connections with community agencies that assist diverse groups. Some specific needs and strategies include:

- o Interpretation and Translation service available to all AHS staff.
- o Tools for working with LEP clients
- o Specialized training for communicating across cultures, and; communicating effectively through an interpreter.

The key service needs for reaching out to individuals who are blind or visually impaired and who are minorities (Strategies for Reaching Out to Minority Individuals With Disabilities—By Fabricio E. Balcazar, Ph.D., Principal Investigator Developing the Capacity of Minority Communities to Promote the Implementation of the Americans with Disabilities Act (ADA)—University of Illinois at Chicago) are:

- o Making sure your agency can provide the services they need.
- o Utilizing a diverse research team or diverse staff to deliver services to the target population.
- o Building personal relationships with members of the target community.
- o Becoming a part of the local network.
- o Building consumers' strengths.
- o Being persistent and do not let consumers go when they fail to comply.
- o Being willing to listen. If we want to reach out, we should be able and willing to listen.
- o Utilizing members of the target community in outreach efforts.
- o Meeting people where they are instead of waiting for them to come to you.
- o Utilizing multiple channels of communication to disseminate information in the target community.

C. who have been unserved or underserved by the VR program;

The CSNA data shows 3 categories of individuals who are unserved or underserved. Vermont is the 2nd oldest average age population in the country. Many of these older individuals desire to stay in the workforce to meet their financial needs. Losing vision can be part of the aging process and this becomes a major adjustment and often causes feelings of loss and denial. DBVI is available help these individuals stay in the workforce as they learn new skills to adapt to their vision loss.

The data also shows that individuals who are deaf-blind have unique and specific needs due to their dual sensory impairment. Services like Support Service Providers are helpful to access the community and lesson isolation. There are very few professionals in the country who can teach adaptive blindness skills like Orientation and Mobility who can also communicate using tactile sign. There is a need to build more of that capacity in Vermont. The ICANNECT program is beginning to grow in New England and Perkins is providing important technology through that program. There is a need to build strong partnerships with the Helen Keller National Center who can provide specialized training for staff and services for deaf-blind individuals.

The greatest underserved population is in the Northeast Kingdom of the state. This is very rural and has very few jobs. DBVI encourages youth in this area of the state to participate in the LEAP summer residential work experience program and the residential school year retreats so they can participate in job readiness training and work experiences in an area where there are more work opportunities.

The AHS website resource includes:

<https://inside.vermont.gov/agency/AHSIntra/LEP/Pages/LEP.aspx>

- Interpretation and Translation service available to all AHS staff.
- Tools for working with LEP clients
- Specialized training for communicating across cultures, and; communicating effectively through an interpreter.
- DBVI data shows a need to increase the percentage of transition age students that receive services.

Suggestions in Assume Nothing!—A Monograph from the 38th Institute on Rehabilitation Issues to Address Underserved Populations, Including Individuals Who Are Deaf-Blind

Rehabilitation Services Administration U.S. Department of Education

- Cultural training for staff from consultants on DB culture and someone from Alliance of Africans Living in Vermont or Vermont Refugee Resettlement Program for ethnic minorities. DBVI need to truly understand the beliefs and values about work and “independence” and disability held by people from these cultures. (pages 23 & 28)
- Get a DB person or a person of color on the SRC (top of page 17)
- Lack of services for DB people. Someone in the state should provide DB leadership for services. (p 31)
- Initiate a DB targeted “town hall meeting” (p 33)
- Create a partnership with VR to assist individuals who are deaf-blind seeking employment.
- Assign specific staff to take the lead for underserved and underrepresented populations.
- Add cultural humility/ cultural competency training
- Consider outreach for All strategies in each region.

D. who have been served through other components of the statewide workforce development system; and

WIOA has been a great way to bring together all of the partners of the American Job Centers. Workgroups including all of the partners have met to determine the priorities and best ways to make the workforce programs available.

The workgroup has identified the following needs.

- Maximize access to the workforce development system through seamless coordination and communication among the different partners to provide a quality, consistent experience for all Vermonters.
- The workforce development system will prioritize pathways to livable wage employment for all Vermonters, with an increased focus on low income Vermonters.
- Strengthen the Vermont economy by increasing the number of Vermont women employed in the skilled trades, STEM fields, advanced manufacturing and other Vermont priority sectors.
- Ensure all students who graduate from high school are college ready, career ready, or both; increase the number of Vermonters who pursue and complete post-secondary education, training and career opportunities with the education and specific skills necessary to keep Vermonters competitive in the economic sectors critical to the Vermont economy.
- Align the workforce development system to the needs of employers, as well as job seekers, through systematic and ongoing engagement and partnership.

E. who are youth with disabilities and students with disabilities, including, as appropriate, their need for pre-employment transition services or other transition services.

The research and feedback from students and families identify work experiences, work readiness, and assistive technology skills as most helpful for future employment success. When students have the opportunity for several work experiences during high school they learn what types of jobs they like and don't like. They also learn transferable skills they can use for future jobs. The challenge for Vermont students is that they have very limited opportunities for these work experiences in their small rural town. Ten years ago, DBVI created a strategy to meet that need. It was necessary to create a summer residential experience for students from across the state to live in a larger community where there is a wide variety of work experience jobs available. The program has expanded and now includes weekend retreats during the school year. These retreats focus on self-advocacy and job readiness training. Most recently all LEAP activities are including some aspect of assistive technology that is built into the curriculum. Proficiency with technology is also a predictor of future employment success. DBVI counselors have identified the need for students to have better technology skills for the workplace. For that reason DBVI developed and assessment tool to evaluate technology skills. This information can then be used by schools and DBVI staff to create opportunities to improve these skills before college, vocational training, or employment.

Students also learn important self-advocacy skills and independent living skills at the LEAP work experiences and job readiness retreats which are also strong predictors and essential for future employment success.

For students who do not choose to participate in summer LEAP or school year retreats, DBVI staff work with several partners to establish work experiences in a students' local community. In some situations a DBVI Counselor can make connections with the school-based employment specialist to assist a student, or connect them with employment related workshops and other school based activities. It is the intent of DBVI to make sure all visually impaired students have the opportunity for multiple work experiences before the exit high school.

The combination of these strategies and DBVI Counselor involvement makes it possible for Vermont students to access the 5-core Pre-ETS as identified in WIOA.

The five required activities are:

- Job exploration counseling
- Work-based learning experiences
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education
- Workplace readiness training to develop social skills and independent living
- Instruction in self-advocacy, including peer mentoring

DBVI considers a student with a disability to be:

- Between the ages of 14 and 21;
- Is in an educational program; and
- Is eligible for and receiving special education or related services under IDEA or is an individual with a disability for purposes of section 504 of the Rehabilitation Act

The Vermont Department of Education has indicated in their "Unduplicated Child Count" report that there are approximately 50 potentially eligible students in secondary education who are blind, visually impaired, or Deaf-Blind this school year.

- DBVI is currently serving 32 secondary students (17 PAS and 15 Open VR) and 12 post-secondary ages 14 through 21.
- DBVI projects 42 students for this current school year.

Pre-ETS Budget Forecasting

Pre-employment transition services are comprised of the five required activities and nine authorized activities. There must be enough funds available to be able to offer the five required activities to students with disabilities. If there is any money remaining, that money is used towards the nine authorized activities.

FFY 1017--As of September 2017:

- \$290,000 (15% reserve requirement + carry over/re-allotment)
- \$14,460 was spent on staff time and associated expenses
- \$100,000 for Coordination In contracts (LEAP, CCS)
- \$175,540 was spent on the 5 required Pre-ETS Transition Service Areas.
- \$5,485 Average Cost Per Student for the 5 required Pre-ETS Services (based on 32 students).
- \$0 was spent/encumbered on the nine authorized pre-employment transition services

Fiscal Year=17; Agency 15% Reserve Requirement= \$290,000; Number of students served=32; Total Pre-ETS Required Activities= \$175,540; Average Cost Per Student= \$5,485; Total Pre-ETS Coordination Activities= \$114,460; Total Pre-ETS Expenditures= \$270,000; Amount Available for Authorized Activities= \$0

Projections for FFY 18:

- \$270,000 (15% reserve requirement + re-allotment/carry over)
- \$16,000 staff time and associated expenses
- \$100,000 for coordination in contracts (LEAP, CCS)
- \$154,000 on the five required pre-employment transition services areas.
- \$3,667 Average Cost Per Student for the 5 required Pre-ETS Services (based on 42 students).
- \$0 on the nine authorized pre-employment transition services

Fiscal Year=18 (projected); Agency 15% Reserve Requirement= \$270,000; Number of students served=42; Total Pre-ETS Required Activities= \$154,000; Average Cost Per Student= \$3,667; Total Pre-ETS Coordination Activities= \$100,000; Total Pre-ETS Expenditures= \$270,000; Amount Available for Authorized Activities= \$0

2. Identify the need to establish, develop, or improve community rehabilitation programs within the State; and

DBVI partners help us achieve the results our consumers expect. One finding of the statewide survey and focus groups identifies adaptive skills training as one of the top two services that help them achieve their goals. People who lose vision need to learn new adaptive skills to remain independent at home and work. DBVI contracts with the Vermont Association for the Blind and Visually Impaired to provide Certified Orientation and Mobility Instructors, Rehabilitation and Low Vision Therapists. These instructors teach the skills and DBVI consumer report being more independent because of their new skills. This need for adaptive skills training is ranked very high in all sections of the CSNA and survey results show a high level of satisfaction with their skill gain results.

The other major DBVI community partner is the Vermont Industry for Business, Industry and Rehabilitation. DBVI contracts with VABIR to provide job development and employment consultant services. VABIR creates relationships with Vermont business and helps match DBVI consumers with business needs. In many instances this begins with a work experience and leads to employment. The CSNA does identify more job training as a need. VABIR provides those opportunities through progressive employment and satisfaction for these services ranks high.

3. Include an assessment of the needs of individuals with disabilities for transition career services and pre-employment transition services, and the extent to which such services are coordinated with transition services provided under the Individuals with Disabilities Education Act .

DBVI coordinates with several partners to meet the pre-employment and transition service needs of students. The DBVI Director and Counselors meet monthly with the Management Team of the Vermont Association for the Blind and Visually Impaired. VABVI has a statewide contract from the Vermont Agency of Education to provide a statewide network of the Teachers of the Visually Impaired. The TVI's provide academic support and direct instruction to all blind and visually impaired students in Vermont. The intent of these monthly meeting is to coordinate the efforts of both agencies to support student transition needs. DBVI Counselors and TVIs in their region also meet regularly to discuss students' transition and pre-employment needs. This helps the counselor to connect students with the 5-core Pre-ETS activities by making arrangements for local work experiences, school-based employment activities, Summer LEAP, or school year LEAP job readiness retreats. There is also a monthly meeting of DBVI partner organizations called the Connections Team. The intent of this group is to discuss student needs and develop strategies that provide work experiences or job readiness opportunities in local communities or at the state level.

The DBVI Director also meets quarterly at the Agency of Education with the AOE Special Education State Director, the AOE High School Special Education Consultant, the AOE Adult Basic Education Consultant, the Director of General VR, the Director of Developmental Services, and the Director of the Assistive Technology Program. The intent of this group is to stay connected with overlap needs of WIOA and IDEA. The most current topic is discussions about the new personal learning plans and how transition serviced can be incorporated.

Other important initiatives include DBVI cosponsoring with General VR a statewide conference of all local Core Transition Teams. All regions of the state have monthly meetings of school personnel and local human service providers to discuss local transition resources for students. Several workshops and guest speakers provided information about best practice for student transition. There was also time for local teams to meet and discuss strategies for their region.

A new development is the formation of a Student Advisory Council. The DBVI Director will participate in an annual event that is planned by Vermont Students with disabilities. This is just getting started and the first event will be next school year.

The ultimate need is to work together with AOE and local schools to help students to use their IEP and Personal Learning Plans to create a great transition to employment training or work. DBVI has created transition action plan forms that are used for each student for entering the workforce directly, attending vocational training, or attending college. The needs for each of these future goals are specified on each form. The forms help guide the Local Education Agency IEP and 504 teams as they plan for the unique transition service needs of students who are blind or visually impaired.

k. Annual Estimates

Describe:

1. The number of individuals in the State who are eligible for services;

2016 Disability Status Report--Vermont

American Community Survey

Erickson, W., Lee, C., & von Schrader, S. (2016). 2016 Disability Status Report:

Vermont. Ithaca, NY: Cornell University Yang-Tan Institute on Employment and Disability (YTI).

www.disabilitystatistics.org

Summary of Overall Vermont Data

Age--In 2016, the prevalence of disability in VT was:

- 14.3 percent for persons of all ages
- <1 percent for persons ages 4 and under
- 6.2 percent for persons ages 5 to 15
- 8.6 percent for persons ages 16 to 20
- 12.0 percent for persons ages 21 to 64
- 23.4 percent for persons ages 65 to 74
- 48.3 percent for persons ages 75+

Disability Type--In 2016, the prevalence of the six disability types among persons of all ages in VT was:

- 2.3% reported a Visual Disability
- 4.4% reported a Hearing Disability
- 6.7% reported an Ambulatory Disability
- 5.5% reported a Cognitive Disability
- 2.9% reported a Self-Care Disability
- 6.0% reported an Independent Living Disability

Gender--In 2016, 13.9 percent of females of all ages and 14.7 percent of males of all ages in VT reported a disability.

Hispanic/Latino--In 2016, the prevalence of disability among persons of all ages of Hispanic or Latino origin in VT was 7.9 percent.

Race--In VT in 2016, the prevalence of disability for working-age people (ages 21 to 64) was:

- 11.9 percent among Whites
- 9.7 percent among Black / African Americans
- <1 percent among Asians
- 46.7 percent among Native Americans
- 14.1 percent among persons of some other race(s)

Populations in Households in Vermont

Content provided by the US Census bureau for the years 2010, 2011, 2012, 2013, 2014 and 2015.

<https://suburbanstats.org/population/how-many-people-live-in-vermont>

Ages 15 to 17=12,648

Ages 18 to 19=6,392

Ages 20=3,244

Ages 21=3,615

Ages 22 to 24=11,034

Number of Individuals who are minorities

Content provided by the US Census bureau for the years 2010, 2011, 2012, 2013, 2014 and 2015.

<https://suburbanstats.org/population/how-many-people-live-in-vermont>

Total population of Vermont= 625,741

White- 596,292

Two or More Races=10,753

Hispanic or Latino=9,208

Asian=7,947

Black or African=6,277

American Indian=2,207

Another Race=2,105

Three or More Races=610

Native Hawaiian=160

Summary of Visual Disability data in Vermont—American Community Survey

Is this person blind or does he/she have serious difficulty seeing even when wearing **glasses?**

Working Age Adults

DBVI estimates that there are approximately 7,100 Vermonters of working age (21-64) who are blind or severely visually impaired (meaning even with correction they are not able to easily read the newspaper). DBVI provides RSA defined services to approximately 5.3% of these individuals annually (293 in FFY17).

- **Visual Disability Total= 14,100 (2.1% of 619,100 VT population)**
- **Agess 5 to 15= 100 (6.4% of 75,800)**
- **Age 16 to 20= 80 (<1% of 44,000)**
- **Age 21 to 64= 7,100 (2% of 357,300)**
- **Age 65 to 74= 2,500 (3.6% of 68,500)**
- **Age 75 and Older= 3,400 (7.9% of 42,800)**

Education Rate in Vermont with Visual Disability

Less than High School=800 (11.9% of 7,100)

A HS diploma or equivalent=3,600 (50.4% of 7,100)

Some college/associates degree=1,500 (21.1% of 7,100)

College Bachelor's Degree=1,200 (16.5% of 7,100)

Number of Youth who are Deaf-Blind

<https://docs.google.com/document/d/189sATr89VCj650qtBeU29jtRGWS9yN-6JJxrEVw9YGs/edit?usp=sharing>

Ages 12 to 17=11

Ages 18 to 21=3

DBVI Projections for FFY 2018:

- The cost per employment outcome will remain at the \$18,000 to \$19,000 level.
- Employment outcomes will increase to 70.

DBVI Projections for Case Status Information FFY 2018:

- The number of new plans will be 70.
- The number of individuals served through supported employment will be 10.
- The number of new applications to increase to 70.

DBVI Projections for students receiving Pre-ETS

FFY 17 served 32.

FFY 18 projection is 42.

Data from RSA 113:

New Applications

FFY 2011—88

FFY 2012—111

FFY 2013—105

FFY 2014—112

FFY 2015---102

FFY 2016---81

FFY 2017---53

FFY 2018--- 70 (Projection)

Individuals Implementing Plan, on hand October 1st

FFY 2016---231

FFY 2017---206

Individuals Implementing Plan at End of Period

FFY 2016---206

FFY 2017---174

Number of Employment Plans Developed:

FFY 2011—83

FFY 2012—106

FFY 2013—98

FFY 2014—96

FFY 2015—111

FFY 2016---77

FFY 2017---48

FFY 2018---70 (Projection)

Achieve Employment Outcome

FFY 2011—69

FFY 2012—68

FFY 2013—70

FFY 2014—74

FFY 2015—90

FFY 2016---81

FFY 2017---64

FFY 2018---70 (Projection)

Closed After Services Initiated, Without Employment

FFY 2016---21

FFY 2017---16

Agency Expenditures Services Provided by DBVI (from RSA 2)

Private Community Rehabilitation Programs

FFY 2016---\$286,990

FFY 2017---\$265,444

Total Innovation and Expansion Activity Costs

FFY 2016---\$12,900

FFY 2017---\$17,347

Assessment

FFY 2016--- \$4,886

FFY 2017---\$3,060

Diagnosis and Treatment of Impairments

FFY 2016---\$43,493

FFY 2017---\$39,193

Four-Year College or University Training

FFY 2016---\$49,517

FFY 2017---\$47,567

Occupational or Vocational Training

FFY 2016---\$112,178

FFY 2017---\$33,770

Job Readiness Training

FFY 2016---\$101,347

FFY 2017---\$200,456

Disability Related Skills Training

FFY 2016---\$70,297

FFY 2017---\$48,022

Transportation

FFY 2016---\$61,280

FFY 2017---\$55,921

Total SE Program Service Expenditure

FFY 2016---\$7,335

FFY 2017---\$8,306

Assessment, Counseling, Guidance, and Placement

FFY 2011--\$784,571

FFY 2012--\$805,115

FFY 2013--\$913,971

FFY 2014--\$844,885

FFY 2015--\$863,383

FFY 2016---\$923,154

FFY 2017---\$1,000,008

Total Section 110 Funds Expended on Service:

FFY 2011--\$561,317

FFY 2012--\$630,236

FFY 2013--\$621,521

FFY 2014--\$643,503

FFY 2015--\$852,930

FFY 2016---\$736,425

FFY 2017---\$706,782

RSA MIS Ad Hoc Query

Average hourly earnings for competitive employment outcomes

FFY 14---\$16.46

FFY 15---\$15.43

FFY 16---\$18.41

FFY 16 Average for Blind Agencies=\$16.27

Average hours worked for competitive employment outcomes

FFY 14---29.08

FFY 15---29.63

FFY 16---32.60

FFY 16 Average for Blind Agencies=31.06**2. The number of eligible individuals who will receive services under:****A. The VR Program;****Budget Forecasting**

Pre-employment transition services are comprised of the five required activities and nine authorized activities. There must be enough funds available to be able to offer the five required activities to students with disabilities. If there is any money remaining, that money is used towards the nine authorized activities.

FFY 1017--As of September 2017:

- **\$290,000 (15% reserve requirement + carry over/re-allotment)**
- **\$14,460 was spent on staff time and associated expenses**
- **\$100,000 for Coordination In contracts (LEAP, CCS)**
- **\$175,540 was spent on the 5 required Pre-ETS Transition Service Areas.**
- \$5,485 Average Cost Per Student for the 5 required Pre-ETS Services (based on 32 students).
- **\$0 was spent/encumbered on the nine authorized pre-employment transition services**

Fiscal Year=17; Agency 15% Reserve Requirement= \$290,000; Number of students served=32; Total Pre-ETS Required Activities= \$175,540; Average Cost Per Student= \$5,485; Total Pre-ETS Coordination Activities= \$114,460; Total Pre-ETS Expenditures= \$270,000; Amount Available for Authorized Activities= \$0

Projections for FFY 18:

- **\$270,000 (15% reserve requirement + re-allotment/carry over)**
- **\$16,000 staff time and associated expenses**
- **\$100,000 for coordination in contracts (LEAP, CCS)**
- **\$154,000 on the five required pre-employment transition services areas.**
- \$3,667 Average Cost Per Student for the 5 required Pre-ETS Services (based on 42 students).
- **\$0 on the nine authorized pre-employment transition services**

Fiscal Year=18 (projected); Agency 15% Reserve Requirement= \$270,000; Number of students served=42; Total Pre-ETS Required Activities= \$154,000; Average Cost Per Student= \$3,667; Total Pre-ETS Coordination Activities= \$100,000; Total Pre-ETS Expenditures= \$270,000; Amount Available for Authorized Activities= \$0

DBVI considers a student with a disability to be:

- **Between the ages of 14 and 21;**
- **Is in an educational program; and**
- **Is eligible for and receiving special education or related services under IDEA or is an individual with a disability for purposes of section 504 of the Rehabilitation Act**

The Vermont Department of Education has indicated in their "Unduplicated Child Count" report that there are approximately 50 potentially eligible students in secondary education who are blind, visually impaired, or Deaf-Blind this school year.

- **DBVI is currently serving 32 secondary students age 14-21.**
- **DBVI projects 42 for next school year.**

B. The Supported Employment Program; and

DBVI has consistently increased or maintained the number of individuals served.

- FFY 2011—4; FFY 2012—10; FFY 2013—7; FFY 2014—10; FFY 2015—10; FFY 2016---11; FFY 2017---14
- FFY 2018---10 to 14 (Projection)

C. each priority category, if under an order of selection;

NA.

3. The number of individuals who are eligible for VR services, but are not receiving such services due to an order of selection; and

NA.

4. The cost of services for the number of individuals estimated to be eligible for services. If under an order of selection, identify the cost of services for each priority category.

See above (K. 1.).

I. State Goals and Priorities

The designated State unit must:

1. Identify if the goals and priorities were jointly developed

Identify if the goals and priorities were jointly developed and agreed to by the State VR agency and the State Rehabilitation Council, if the State has a Council, and jointly agreed to any revisions.

DBVI Goals and Priorities July 1, 2018 to June 30, 2020

Goal 1—Employment Rate

- **Employment rate two quarters post program exit**
- **Employment rate four quarters post program exit**

PY 2018 Measures (1st baseline year):

- **% Employment rate two quarters post program exit**
- **% Employment rate four quarters post program exit**

PY 2019 Targets (2nd baseline year):

- **DBVI is collecting baseline data on these measures during PY 18 and PY 19. Targets will be set beginning July 1, 2019.**

Goal 2—Median Earnings

- **Median earnings at two quarters post program exit**

PY 2018 Measures (1st baseline year):

- **% Median earnings at two quarters post program exit**

PY 2019 Targets (2nd baseline year):

- **DBVI is collecting baseline data on these measures during PY 18 and PY 19. Targets will be set beginning July 1, 2019.**

Goal 3—Credential Attainment

- **Credential Attainment**

PY 2018 Measures (1st baseline year):

- **% Credential Attainment**

PY 2019 Targets (2nd baseline year):

- **DBVI is collecting baseline data on these measures during PY 18 and PY 19. Targets will be set beginning July 1, 2019.**

Goal 4—Measurable Employment Skills Gains

- **Measurable Employment Skills Gains**

PY 2018 Measures (1st baseline year):

- **% Measurable Employment Skills Gains**

PY 2019 Targets (2nd baseline year):

- **DBVI is collecting baseline data on these measures during PY 18 and PY 19. Targets will be set beginning July 1, 2019.**

Goal 5—Pre-Employment Transition Skills

- **All students in Vermont with a visual disability will have the opportunity to receive the 5-core Pre-ETS services.**

PY 2018 Measures (1st baseline year):

- **% of students with a visual disability that engage in at least one of the 5-core Pre-ETS services.**

PY 2019 Targets (2nd baseline year):

- **DBVI is collecting baseline data on these measures during PY 18 and PY 19. Targets will be set beginning July 1, 2019.**

Goal 6—Student Transition to Work, Vocational Training, or College

- **Within 2 quarters post high school exit, all individuals will either obtain a job or begin vocational training or college.**

PY 2018 Measures (1st baseline year):

- **% of individuals who obtained a job.**
- **% of individuals who attended vocational training.**
- **% of individuals who complete vocational training.**
- **% of individuals who begin college.**
- **% of individuals who graduate college with an Associate Degree.**
- **% of individuals who graduate college with a Bachelor's Degree.**

PY 2019 Targets (2nd baseline year):

- **DBVI is collecting baseline data on these measures during PY 18 and PY 19. Targets will be set beginning July 1, 2019.**

Goal 7—Disaggregation of Participant Results

- **All individuals in Vermont with a Visual Disability who want to work will receive service and achieve their employment goals.**

PY 2018 Measures (1st baseline year):

- **% of minorities served.**
- **% of minorities achieve employment outcome.**
- **% of def-blind served.**
- **% of def-blind who achieve employment outcome.**
- **% of individuals who receive supported employment services.**
- **% of individuals who receive supported employment and achieve employment outcome. .**

PY 2019 Targets (2nd baseline year):

- **DBVI is collecting baseline data on these measures during PY 18 and PY 19. Targets will be set beginning July 1, 2019.**

Goal 8—Participation in the American Job Center Partner Programs

- **All individuals in Vermont with a Visual Disability who want assistance from the AJC and partner programs will receive those service and achieve their employment goals.**

PY 2018 Measures (1st baseline year):

- **% of DBVI consumers who also receive services from the AJC or partner programs.**
- **% of individuals who participate in AJC and partner programs with an employment outcome.**

PY 2019 Targets (2nd baseline year):

- **DBVI is collecting baseline data on these measures during PY 18 and PY 19. Targets will be set beginning July 1, 2019.**

Goal 9—Customer Satisfaction

- **Customer Satisfaction with DBVI Services will increase.**

PY 2018 Measures (FFY 17 Survey Results):

- **93%--Overall, how satisfied are you with the DBVI vocational rehabilitation program?**
- **93%=Overall, I am better off as a result of the services I received from DBVI.**
- **95%=DBVI staff treated me with dignity and respect.**
- **94%=How helpful were the staff of DBVI in helping you achieve your vocational rehabilitation goals?**
- **89%=The DBVI vocational rehabilitation services I received helped me become more independent in general.**
- **84%=DBVI helped me reach my job goals.**

PY 2019 Targets (Next Statewide Survey will be FFY 20):

- **DBVI will conduct the next statewide survey in fall 2020 with results reported in January 2021.**

The SRC met in February 2018 for final review and approval of these goals and priorities. Their input is documented in the Statewide Assessment and Input of the SRC sections.

2. Identify the goals and priorities in carrying out the VR and Supported Employment programs.

Included in table above (L.1.)

3. Ensure that the goals and priorities are based on an analysis of the following areas:

The goals were developed as part of DBVI's comprehensive needs assessment which included town meetings, surveys, focus groups, journal research, and staff/SRC input. DBVI staff met several times to review the needs of all results with the SRC to determine the goals. These are outlined in the input from the SRC and the statewide assessment sections.

A. The most recent comprehensive statewide assessment, including any updates;

The goals were developed directly from the FFY 2018 comprehensive needs assessment, submitted in this plan.

B. the State's performance under the performance accountability measures of section 116 of WIOA; and

DBVI worked with the SRC to update the Goals, Priorities, and Strategies based on the FFY 2018 CSNA. DBVI is in year-one of building the baseline for the new WIOA Performance Measures. Year-two of the baseline will begin July 1, 2018 through June 30, 2019. Targets for the new measures will be set and begin on July 1, 2019.

C. other available information on the operation and effectiveness of the VR program, including any reports received from the State Rehabilitation Council and findings and recommendations from monitoring activities conducted under section 107.

DBVI reviewed data provided on the RSA MIS query tools for performance measures, which are included in the current FFY 2018 CSNA. These were evaluated by DBVI and the SRC and are incorporate into the new goals and strategies.

m. Order of Selection

Describe:

1. Whether the designated State unit will implement and order of selection. If so, describe:**A. The order to be followed in selecting eligible individuals to be provided VR services.**

DBVI does not have an order of selection.

B. The justification for the order.

DBVI does not have an order of selection.

C. The service and outcome goals.

DBVI does not have an order of selection.

D. The time within which these goals may be achieved for individuals in each priority category within the order.

DBVI does not have an order of selection.

E. How individuals with the most significant disabilities are selected for services before all other individuals with disabilities; and

DBVI does not have an order of selection.

2. If the designated State unit has elected to serve eligible individuals, regardless of any established order of selection, who require specific services or equipment to maintain employment.

DBVI does not have an order of selection.

n. Goals and Plans for Distribution of title VI Funds.**1. Specify the State's goals and priorities for funds received under section 603 of the Rehabilitation Act for the provision of supported employment services.**

DBVI realizes that it serves customers with significant disabilities who at times require vocational support beyond the scope of DBVI's standard services. It is for this reason that DBVI maintains a "Memorandum of Understanding" (MOU) with the Division of Vocational Rehabilitation (DVR). This MOU describes how funds will be utilized and services provided in the area of supported employment. Thus consumers who may require intensive services, beyond vision impairment issues, to acquire or maintain employment can be provided with the needed support. This MOU provides \$30,000 of Title VI, Part B funds to DVR's Supported Employment Program. In exchange DBVI is able to have consumers avail themselves of a comprehensive and established program providing statewide coverage and the expertise of supported employment providers. Because of the multiple barriers that some DBVI consumers face, the DVR Supported Employment Coordinator helps to determine the most appropriate agency for those with multiple disabilities. DVR may be the more appropriate agency for DBVI consumers in cases where multiple disabilities are present. This coordination, with extensive knowledge of statewide resources, particularly in areas of psychiatric and developmental disability services, can provide technical assistance and the ability to provide to DBVI staff and consumers the best combination of resources. DBVI has a separate grant award of \$6,000 of Title VI, Part B funds to provide short-term support services to qualified consumers. This allows the provision for a contract with a support person, job coach on the job site, or enrollment in a specific program to obtain job skills.

2. Describe the activities to be conducted, with funds reserved pursuant to section 603(d), for youth with the most significant disabilities, including:**A. the provision of extended services for a period not to exceed 4 years; and**

DBVI has an agreement with a designated agency that specializes in employment for youth who need supported employment. This is in addition to the collaboration with VR, and is intended to meet the needs of youth.

B. how the State will leverage other public and private funds to increase resources for extended services and expanded supported employment opportunities for youth with the most significant disabilities.

See N.1. above.

o. State's Strategies

Describe the required strategies and how the agency will use these strategies to achieve its goals and priorities, support innovation and expansion activities, and overcome any barriers to accessing the VR and the Supported Employment programs (See sections 101(a)(15)(D) and (18)(B) of the Rehabilitation Act and section 427 of the General Education Provisions Act (GEPA)):

1. The methods to be used to expand and improve services to individuals with disabilities.**DBVI Employment Strategies July 2018 - June 2020**

Strategy 1: DBVI will collaborate with Creative Workforce Solutions to find employment in accordance with the customer's interests and qualifications.

Goal and Priority Area Addressed:

Actions from previous CSNA that still apply:

- o Assess consumer's technology skills before a work experience begins.
- o Create worksite preparation guidelines to make sure appropriate accommodations are accessible before the work experience begins.
- o Create short-term vocational assessment opportunities by placing individuals at ReSource or the Café to learn about their skills.
- o Establish clear goals with VABIR staff to increase the number of Employment Outcomes, Work Experiences, OJT, and Volunteer Opportunities as tracked in AWARE.

- Expand opportunities in the Randolph-Sheppard Business Enterprise Program.

Strategy 2: All high school students who are blind or visually impaired will complete a DBVI Action Plan Transition form with their DBVI Counselor and IEP or 504 Team.

Goal and Priority Area Addressed: 4

New actions added from the CSNA (February 2018):

- DBVI will share Pre-ETS and Transition planning information on the AOE WIKI site.

Actions from previous CSNA that still apply:

- Each DBVI Counselor will meet at the beginning of the school year with the Teachers of the Visually Impaired in their region to create a plan for identifying potentially eligible students and opening eligible students in the DBVI VR program.
- Each DBVI Counselor will meet with the General VR Transition Counselor in their region.
- A DBVI Action Plan Transition form will be completed and updated annually for all eligible students.
- Participate in statewide Core Transition Teams.
- Continue to increase student participation in the summer Learn Earn and Prosper (LEAP) summer work experiences and Employment Development Retreats during the school year.

Strategy 3: DBVI will promote employment by educating employers and providing opportunities for increased exposure to people who are blind or visually impaired. This will address "Societies reaction to blindness."

New actions added from the CSNA (February 2018):

- DBVI will create a PSA about DBVI services and abilities of people who are blind.

Actions from previous CSNA that still apply:

- Create products to bring and teach employers to understand the assistive equipment
- Create a network of ambassadors who demonstrate their assistive technology or canes and demonstrate to the employers about how they use technology to complete work tasks and travel independently.
- Create a video of people working at their job.
- Find opportunities to show the film "Going Blind" to employer groups at Chambers, Rotary's, and public libraries.
- Find opportunities to teach employer groups about assistive technology.
- Encourage employers to visit the DBVI website.
- Explore the idea of connecting employers through discussion group.
- Work closely with GCEPD to promote employment of people with disabilities.
- Create educational activities for White Cane Day and Disability Awareness Month in October.
- Create a PSA involving an employed individual and company.
- Offer Simulations to demonstrate—"what is it like to be blind?"

Strategy 4: DBVI will create Consumer Driven Events to assist individuals as they prepare for employment.

Goal and Priority Area Addressed:

Actions from previous CSNA that still apply:

- Continue Great Expectations consumer driven events each year.
- Create workshops to develop interpersonal and employment skills
- Create employment support groups.
- Create networking events.
- Opportunities to practice interview and job readiness skills.
- Create peer mentoring opportunities for adjustment to blindness and technology.

Strategy 5: DBVI will create opportunities for access to information.

Goal and Priority Area Addressed:

Actions from previous CSNA that still apply:

- Create opportunities for Peer to Peer Technology Instruction
- DBVI will continue to expand the information on the website and will work with the SRC for ideas.
- Use Customer-Centered Culture to determine "what types of information customers really want?"

Strategy 6: DBVI will address transportation challenges.

Goal and Priority Area Addressed:

New actions added from the CSNA completed February 2018:

- DBVI will work with VTRANS to learn more about their beta website that helps people connect with all the available transportation options in their area.

Actions from previous CSNA that still apply:

- Coordinate with the Vermont Transportation Department on their new initiative and technology application that helps travelers find all the available transportation options in an area.

Actions from previous CSNA that still apply:

- Consider policy to pay for mileage and time of VABVI drivers in order to have a network of drivers available to meet transportation needs.
- Participate in system level planning.
- Assist VABVI to increase the number of volunteer drivers..
- Promote the option for DBVI to pay for the first 60 days of a ride to the job.

Strategy 7: DBVI will improve communication with customers regarding expectations for DBVI services.

Goal and Priority Areas Addressed:

Actions from previous CSNA that still apply:

- DBVI will develop a consistent statewide orientation to DBVI services which will be implemented in all four regional offices.
- DBVI will work within the principles of Customer-Centered Culture to make sure we are answering the question: "What does the consumer really want?"
- DBVI will continually evaluate timeliness, accuracy, and ease of obtaining services. DBVI will establish an ongoing closure survey. Results will be shared and evaluated with the SRC on an ongoing basis.
- Ask customers to evaluate DBVI products using the Customer-Centered Culture model.
- Implement a closure survey that can be sent to all closed cases..

Strategy 8: DBVI will increase capacity to serve underserved populations through the implementation of comprehensive outreach.

Goal and Priority Area:

New actions added from the CSNA completed February 2018:

- DBVI will create an inclusive outreach plan that includes consumers and providers.

Actions from previous CSNA that still apply:

- Develop a set of outreach materials to be used at events across the state including outreach to minorities and underserved populations.
- Support efforts to establish Deaf-Blind SSP services in Vermont.
- Coordinate with VR Transition Counselors, and the Teachers of the Visually Impaired to increase the number of transition students served. Create some documents that explain what DBVI can offer.
- Create a statewide system to track all visually impaired students as they graduate high school.
- Add 5-hours / week to the job developer or counselor position in Burlington to expand outreach efforts.

Strategy 9: DBVI will explore outreach strategies to increase applicants and diversify the DBVI caseload.

Goal and Priority Areas:

New actions added from the CSNA completed February 2018:

- DBVI outreach will also include program information to potential consumers and service providers that will establish clear communication and expectations.

Actions from previous CSNA that still apply:

- Educate providers about the importance of timely referrals.
- Outreach to developmental services and mental health agencies that typically do not referred to DBVI.
- Each DBVI region will create an outreach plan for the year that includes outreach to minorities and other underserved or underrepresented individuals in each region.
- The job developer or counselor in Burlington will use an additional 5-hours/week to build relationships with community groups of minority populations.

Strategy 10: DBVI staff will have the tools to deliver services quickly to DBVI customers.

Goal and Priority Areas:

Actions from previous CSNA that still apply:

- DBVI will explore the use of purchasing laptops or iPads for staff to do their job more efficiently.
- DBVI will explore professional development opportunities with the TACE Center.

Strategy 11: DBVI will implement strategies designed to enable DBVI customers to access higher wage employment through short-term training.

Goal and Priority Areas:

Actions from previous CSNA that still apply:

- DBVI will work closely with vocational technical education centers in Vermont to help high school students and adults prepare for the workforce.
- Establish relationships with vocational centers to get consumers trained for positions in the area

- Attend State Technical Education Director's Meeting
- Evaluate the impact of progressive employment on outcomes.
- Track education and training opportunities that lead to degrees or credentials.
- Establish working relationships with Vocational Tech Centers and track participation.

Strategy 12: DBVI will implement activities designed to reduce the number of individuals who are closed in a status 28 (not employed).

Goal and Priority Areas:

Actions from previous CSNA that still apply:

- DBVI will conduct a comprehensive evaluation of status 28 closures to identify any specific trends or issues that DBVI needs to address.

Strategy 13: DBVI will partner with the Vermont Department of Labor, Job Centers, and Adult Education to provide employment training options for dual DBVI/DOL customers.

Goal and Priority Areas:

New actions added from the CSNA completed February 2018:

- DBVI will implement a plan for staying connected with all DOL partners of the AJC.

Actions from previous CSNA that still apply:

- DBVI will work closely with DOL to create and implement the Unified Plan with a common mission and vision to include all Vermonters in the workforce.
- DBVI will establish a system for tracking participation of DBVI customers who utilize DOL services and training.
- DBVI will work with CWS local teams and DOL to obtain employment needs of companies and then match DBVI customers with specific training.
- DBVI will invite DOL to a staff meeting to discuss collaboration ideas.

Strategy 14: DBVI will provide technology training for people who need to prepare for a job or succeed at a current job.

Goal and Priority Areas:

New actions added from the CSNA completed February 2018:

- DBVI will create a consumer listserv that will be used to share technology solutions for access and work and in the community.

Actions from previous CSNA that still apply:

- Create a menu of training options ranging from expert training to independent study
- Create Peer to Peer Technology Instruction
- DBVI will problem solve to make job sites accessible through technology training. Use a team approach for a given situation including customer, job developer, counselor, job site technology evaluation, and training.
- DBVI will assist customers to continuously improve work related technology skills like using the internet, Microsoft Office, M312, and Adobe documents so they can do their job in the most efficient way.

2. How a broad range of assistive technology services and devices will be provided to individuals with disabilities at each stage of the rehabilitation process and on a statewide basis.

DBVI has a strong and effective process for determining assistive technology needs and delivering necessary training. The DBVI technology evaluator has been providing this service to DBVI consumers for more than 20-years. This service is consistently ranked in all surveys as the most helpful for meeting employment goals. Technology is the key for opening doors for people who are blind or visually impaired.

Our goal is to stay current and to find solutions for accessing the essential functions of a job. Technology is often the answer for creating access to job tasks. Once the technology is identified, it is installed and followed-up with on-site training.

The most common solutions involve screen magnification, screen readers, and electronic magnification. The I-Technology has created opportunities for DBVI consumers to use mobile technology for work tasks. People can now use voiceover on the iPhone to access their email, contacts, and calendars on-the-go. There are also several new apps that can take a picture of text document and have it read using voiceover. Access to information is essential to many job tasks and DBVI makes this a priority.

3. The outreach procedures that will be used to identify and serve individuals with disabilities who are minorities, including those with the most significant disabilities, as well as those who have been unserved or underserved by the VR program.

Data from the CSNA shows that DBVI needs to continue outreach efforts in all areas. The main strategy is for each region to implement an annual outreach plan. This plan will include general outreach and specific outreach to minority groups and underserved and underrepresented groups. These plans will vary due to the nature of each region. For example, the Northeast Kingdom is very rural and city of Burlington is very populated. Each plan will specifically include outreach to minority groups, people who are older and want to work, students, and individuals who are deaf-blind.

4. The methods to be used to improve and expand VR services for students with disabilities, including the coordination of services designed to facilitate the transition of such students from

school to postsecondary life (including the receipt of VR services, postsecondary education, employment, and pre-employment transition services).

DBVI uses several strategies to address the needs and transition. It begins with outreach to all students who are blind or visually impaired. Before school begins each year, DBVI Counselors meet the Teachers of the Visually Impaired for all high schools in their region. They review the student list and determining which are potentially eligible as Pre-Application students and which are ready to be open the DBVI VR as an "Open" case. All of these students have the opportunity to participate in the 5-core Pre-ETS services. Outreach is also made directly to students and families with an explanation about the ways DBVI can assist with Transition Planning and the availability of the 5-core Pre-ETS services.

Several strategies are used to deliver the 5-core Pre-ETS services. Some students may decide to begin as a Pre-Application student and participate in work experiences in their local communities. They may also be connected with special job readiness training opportunities in their local high schools. Other students may choose to participate in short-term residential work-based learning or job readiness training. This strategy is necessary in Vermont because of the rural nature. Many small communities do not have any work experiences available. This approach makes it possible for students to choose from a variety of work experiences and internships in Burlington where there are many employers. During the school year there are several job readiness workshops during school vacations and weekends so students don't miss school. This approach takes several partners and has shown great results. Please see section "P" for Progress Updates.

5. If applicable, plans for establishing, developing, or improving community rehabilitation programs within the State.

See Above (O.1).

6. Strategies to improve the performance of the State with respect to the performance accountability measures under section 116 of WIOA.

DBVI will continue to use the Creative Workforce System to connect DBVI consumers with employers. Progressive Employment continues to be very effective. Many DBVI consumers begin with a work experience and eventually get a job at that company. Other individuals try a couple different work experiences and decide to go for more education or vocational training in an area of their interest. These experiences are always positive steps toward determining future careers and help people learn what they like and don't like. It is also a great way to educate employers about the abilities of people doing these jobs.

DBVI also supports college or vocational training which ultimately lead to good jobs. DBVI consistently ranks above the national blind agency average for wages and number of hours worked. This result is directly connection to college and vocational training.

DBVI is in the process of developing baseline measures for credential attainment and measurable employment skill gains. These opportunities will be enhanced through collaborations with all of the WIOA partners. DBVI will evaluate what each program can offer and then connect DBVI consumers to those programs.

7. Strategies for assisting other components of the statewide workforce development system in assisting individuals with disabilities.

DBVI will work with DOL and AOE to maximize integration of individuals who are blind or visually impaired into the available trainings and programs. This will involve a commitment from all partners for universal design. DBVI has been a voice for this approach and provides expertise in this area.

WIOA is a great opportunity for DBVI consumers to access these programs that have typically been underutilized by this population. Access to these programs has proven to be challenging in the past and these new partnerships using universal design will certainly open doors.

8. How the agency's strategies will be used to:

A. achieve goals and priorities by the State, consistent with the comprehensive needs assessment;

See Above (O.1).

B. support innovation and expansion activities; and

See Above (O.1).

C. overcome identified barriers relating to equitable access to and participation of individuals with disabilities in the State VR Services Program and the State Supported Employment Services Program.

DBVI has a long and successful history of collaboration with the larger General VR Agency in Vermont to connect consumers with the most severe disabilities with the Developmental Service Agencies in Vermont. This collaboration makes it possible for students to be identified early in high school and a determination about meeting a funding priority before graduation.

In cases when students do not meet the criteria for a waiver, DBVI has established a partnership directly with a Development Service Agency to provide specialized job development services.

p. Evaluation and Reports of Progress: VR and Supported Employment Goals

Describe:

1. An evaluation of the extent to which the VR program goals described in the approved VR services portion of the Unified or Combined State Plan for the most recently completed program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals.

FFY 2017 Goals and Priorities as outlined in the state plan

Goal 1—Economic independence.

- **Livable wage job and income**
- **Stay employed at least 6 months**

- **Stay employed one year or more**
- **Credential Attainment**
- **Measurable Employment Skill Gains**

FFY 2017 Measures:

- **% Employment 2nd quarter after exit**
- **% Employment 4th quarter after exit**
- **% Credential Attainment**
- **% Measurable employment skill gains**

FFY 2017 Targets:

- **DBVI is collecting data for year one of the baseline (July 2017 - June 2018).**

Program Year 2017 results:

- **DBVI is collecting baseline data on these measures during PY 18 and PY 19. Targets will be set beginning July 1, 2019.**

Strategies that contributed to the achievement of this goal included:

- **Progressive employment continues to be a very effective strategy in many ways. It is a great way for consumers to learn new job skills and build confidence. It is also a great way to educate employers about how a blind person can use simple accommodations to accomplish essential functions of the work.**
- **College and other vocational training also lead our consumer to good paying jobs. During this training DBVI supports a portion of tuition reimbursement and provides necessary adaptive technology and training. Assistive technology and training are consistently ranked as most helpful for meeting training and employment goals.**

Factors that continue to impede implementation include:

- **DBVI implemented the AWARE case management system in September 2017 and it is now possible to collect data and build the 2-year data baseline.**

Goal 2—Employment preparation.

- **High school students within 6 months of graduation or exit from HS will obtain a job, or attend vocational training or college.**

FFY 2017 Measures:**Within 6 months after graduation or exiting High school:**

- **% of individuals with a job**
- **% of individuals attending vocational training**
- **% of individuals attending college**

FFY 2017 Targets:

- **DBVI is collecting baseline data on these measures during PY 18 and PY 19. Targets will be set beginning July 1, 2019.**

Program Year 2017 results:

- **100% of students who exited high school obtained a job or started vocational training or college.**
- **DBVI Served 17 Pre Application Students; 15 High School Students; and 12 College Students.**

Strategies that contributed to the achievement of this goal included:

- **The summer LEAP program and school year weekend retreats have inspired students to believe they can work. These programs are designed to promote success at these initial employment experiences. Students receive a lot of feedback about their work performance and receive enough support for success.**
- **Students also learn from and encourage each other. Many of the older students become leaders and share their success experiences at college and work.**
- **Both programs emphasize the importance of assistive technology and create real world opportunities for practice.**
- **The weekend retreats focus on workplace readiness which builds a strong foundation for students in transition.**

Factors that continue to impede implementation include:

- **A factor that impedes progress is when students or families are not response to the DBVI series of Pre-Employment opportunities.**

Goal 3—Consumer satisfaction.

- **Consumer satisfaction with DBVI services will increase.**

FFY 2017 Measures:

- **DBVI will conduct a statewide customer satisfaction survey for FFY 2017**

FFY 2017 Targets:

- **DBVI will maintain overall consumer satisfaction at or above the 90% level.**

Program Year 2017 results:

- **93% responded being Better-Off because of services from DBVI.**
- **89% responded that services met their expectations.**
- **90% responded that DBVI staff were helpful to achieve their vocational goals.**
- **93% responded that services helped them become more Independent.**
- **93% responded that they were satisfied with the services from DBVI.**
- **89% responded that DBVI delivered services well.**

Strategies that contributed to the achievement of this goal included:

- **DBVI staff consistently delivers services well and help consumers to meet their goals and become better off.**
- **Staff are trained to use Customer-Centered Culture to obtain the Voice of the Customer as we develop strategies to accomplish desired results.**
- **Staff also use many of the practices in the "7 Habits of Highly Effective People" by Stephen R. Covey to create goals, organize priorities, and effectively work with consumers by understanding their needs and developing a plan of services to accomplish their goals.**

Factors that continue to impede implementation include:

- **A positive factor is that DBVI consistently delivers a high level of customer satisfaction.**

Goal 4—Improve earnings.

- **Consumer earnings will increase beyond the rate of inflation.**

FFY 2017 Measures:

- **RSA Performance Indicator 1.5: DBVI wages compared to state average,**

FFY 2017 Targets:

- **DBVI consumer wages will increase from 79% of state average to 82% of state average wage.**

Program Year 2017 results:

- **The RSA Standards and Indicators are no longer calculated.**

Strategies that contributed to the achievement of this goal included:

- **This RSA Standard and Indicator is no longer measured.**

Goal 5— More consumers will be employed.

- **More consumers will be employed.**

FFY 2017 Measures:

- **RSA Performance Indicator 1.2: Percentage of DBVI consumers achieving an employment outcome.**

FFY 2017 Targets:

- **DBVI consumers achieving an employment outcome will increase from 73% in to 78% (S+I 1.2).**

Program Year 2017 results:

- **The RSA Standards and Indicators are no longer calculated.**

Strategies that contributed to the achievement of this goal included:

- **This RSA Standard and Indicator is no longer measured.**

Goal 6—Increase capacity to serve unserved or underserved populations; specifically:

- **Deaf—Blind**
- **Minority**
- **Individuals who are transition age (14—24) General Outreach to increase number of individuals served**

FFY 2017 Measures:

- **Increase the numbers served in each category.**

FFY 2017 Targets:

- **Increase the number of Deaf-Blind served from 3 to 5.**
- **Increase the percentage of transition age youth served to 22% from 21%.**
- **Increase the percentage of high school students served to 7% from 6%.**
- **Increase the number of individuals served who are minorities from 7 to 9.**

Program Year 2017 results:

- **13 individuals meet the HKNC deaf-blind definition.**
- **The percentage of transition age youth served was 22%.**
- **The percentage of high school students served was 15%.**

- The percentage of minorities served was 10%.

Strategies that contributed to the achievement of this goal included:

· Key strategies involve effective outreach. Each region creates an inclusive regional outreach plan. Each region creates a strategy to reach out to their communities.

Factors that continue to impede implementation include:

· The greatest challenge is getting a response from individuals who do not recognize the value of these services that can help them adapt to vision loss and find meaningful employment.

Goal 7—DBVI will work in collaboration with Creative Workforce Solutions and the DOL to ensure people who are blind or visually impaired have access to services through progressive employment opportunities and the state workforce investment system.

FFY 2017 Measures:

- Increase the number of individuals served by both DBVI and DOL. As indicated on the DBVI tracking database (105—R)

FFY 2017 Targets:

- DBVI will have a total of 10 customers who are served by DBVI and DOL together.

Program Year 2017 results:

- These data were not collected in the transition to the new AWARE system. Informal information does indicate that consumers are more likely to work solely with DBVI.

Strategies that contributed to the achievement of this goal included:

- The DBVI Director has been very involved with the Unified Plan for Vermont which will bring together all of the workforce partners.
- Staff are learning about the potential partnerships to meet the need of individuals who are blind.

Factors that continue to impede implementation include:

- Typically partner programs are not accessible to individuals who are blind.
- DBVI believes the new partnerships through WIOA will lead to DBVI customers participating in the many partner programs of the Job Centers.

Goal 8— DBVI will work to improve the outcomes of community supported employment providers serving individuals with developmental disabilities.

FFY 2017 Measures:

- The number of 26 closures achieved through the supported employment program will increase.

FFY 2017 Targets:

- The number of individuals served through collaboration with VR and Developmental Services will increase from 8 to 10 individuals.

Program Year 2017 results:

- DBVI provided SE services to 10 individuals.

Strategies that contributed to the achievement of this goal included:

- It is very important to get high school students connected with SE programs before they graduate.
- DBVI provides a key role in the partnership with Developmental Services Agencies by bringing expertise in low vision and adaptive blindness skills.

Factors that continue to impede implementation include:

· The numbers for this population can vary greatly from year to year due to the low incidence of blindness. The key is for DBVI to stay closely connected with all visually impaired students in the state and act quickly with supported employment needs are anticipated.

Goal 9—DBVI will work to improve the outcomes of community providers to build adaptive blindness skills.

FFY 2017 Measures:

- Increase the number of 26 closures achieved with assistance of VABVI services.

FFY 2017 Targets:

- Target is to stay within the 70—80% range.

Program Year 2017 results:

A total of 70 individuals received services from VABVI and 50 of these cases successfully achieved a 26 closure (Rehab Rate= 71 %).

Strategies that contributed to the achievement of this goal included:

· This service is consistently ranked in the top two for helping to meet employment goals. DBVI leadership meets monthly with VABVI leadership to discuss continuous improvement in service delivery.

Factors that continue to impede implementation include:

· A positive factor is that VABVI services are ranked by over 90% of consumers as being the most helpful with their employment and independence goals.

Goal 10—DBVI will work to improve the outcomes of community providers to build skills for the workforce.

FFY 2017 Measures:

- Increase the number of 26 closures achieved with assistance of VABIR services.

FFY 2017 Targets:

- Target is to stay within the 70—80% range.

Program Year 2017 results:

- A total of 30 individuals received services from VABIR and 15 of these cases successfully achieved a 26 closure (Rehab Rate= 50 %).

Strategies that contributed to the achievement of this goal included:

- Employment Consultant staff through VABIR create strong and effective relationships with employers and then match consumers to meet those needs.
- The use of Salesforce has proven to be a great way to connect consumers with a strong employment match.

Factors that continue to impede implementation include:

- A positive factor is the increased openness of employers to allow progressive employment opportunities at their business.

General Program Results and Highlights

Recent Developments and Accomplishments

This year DBVI organized several events around the state to educate the public about White Cane Safety. The white cane is a symbol of strength and independence for blind and visually impaired people, used by people who are blind as they travel independently. Members of the public received training in safe travel techniques from an Orientation and Mobility Instructor, increasing awareness of what it is like to travel with the white cane.

The main events were in Burlington, Montpelier, and Rutland. Each included a walk guided by an Orientation and Mobility Specialist to demonstrate proper use of the white cane and safe travel techniques. These events are great opportunities to educate the public and to have meaningful discussions about how blind and visually impaired individuals travel within their communities independently.

DBVI staff worked closely as a team this year to accomplish major initiatives. This included updating several policies to reflect the intent of the recent Workforce Innovation and Opportunity Act (WIOA). This Act represents a significant shift towards serving students transitioning to work. This year DBVI staff participated in several regional and statewide events to collaborate and share resources about helping students successfully prepare and enter the workforce.

Another major initiative was the successful rollout of the AWARE automated case management system. This initial design phase was followed by pilot testing, training, and full implementation. This system moves DBVI into compliance with the new WIOA reporting requirements, and will help DBVI staff to efficiently complete their work.

Future Directions

DBVI believes the best path forward includes a solid foundation in technology. Relevant new technologies emerge every day, and our staff stay current to determine the solutions that help our customers achieve their employment and independence goals. Several new products have emerged this year. For example, a new free application was launched this year that allows users to read text by pointing the camera of their phone towards the text. It also can read the bar code on items in a store and read back the contents of the item. Technology helps people to accomplish tasks independently, and DBVI will maintain a strong foundation in new innovations.

New technologies are exciting and open many new doors; however, DBVI is committed to the importance of the basics such as touch typing and the importance of Braille. These skills are essential for students transitioning to higher education and job training. The Job Readiness Workshops will incorporate opportunities to use these skills in the upcoming year.

DBVI will be piloting some exciting work from home opportunities this year. Our goal is to identify the skills and service products needed by Vermont employers. We will then support specialized training and technology to meet those business needs.

Student Programs

LEAP Program Overview

The LEAP Program provides students and young adults, ages 14-24, who are blind or visually impaired the opportunity to gain skills needed to be independent, confident, and productive with the outcome of increased employability. LEAP is a workforce development program which delivers Pre-Employment Transitional Services. The program provides work based learning experiences, internships and workshops so that participants are more competitive entering the workforce.

LEAP includes an intensive summer residential program which includes living in community housing and focuses on independent life skills, leadership, working with others, and achieving success working a full week.

LEAP also facilitates year-round Professional Growth Retreats focused on work based readiness training for students to develop social and independent living skills. Themes of past retreats have included: Technology and

Transportation; Workplace Relationships; Food and Finance; The Interview; The Resume; Networking, and more.

To understand the power and impact of LEAP, check out our video: <https://www.youtube.com/watch?v=pVrG1ESEsjM>.

Recent Developments and Accomplishments

A significant accomplishment for the LEAP Program has been creating opportunities for students to engage in leadership development amongst their peers and their communities. During our summer residential program, we place returning students to become Student Leaders or Crew Leader Assistants. These leaders serve as significant role models for younger students, while the experience provides the leaders with a sense of confidence, accomplishment and responsibility.

One student wrote a thank you letter to her mentor:

- **"You are the best mentor I could ask for. That's because you didn't just teach me skills like food preparation and cane travel. You taught me that blindness is not a tragedy, not something to be ashamed of or covered up. Just by being your cheerful, caring, funny, and independent self, you showed me that I don't have to live by the low expectations that others set for me."**

Future Directions

The LEAP Program is currently developing its Technology Builds Brighter Futures Program. Our society is becoming increasingly reliant on technology. It is essential that individuals with blindness or visual impairments have access to this space as digital citizens. LEAP is committed to empowering our students to access the tools they need to become as capable and competitive as their sighted peers.

The Technology Builds Brighter Futures classes will encourage students to collaborate on creative projects using assistive technology. In 2018, each student will participate in an assistive technology class that encompasses a digital culture of sharing, collaboration, and creativity.

Results

From 2014 to 2017 the LEAP program has grown from 18 to 61 participants. The number of training hours has increased from 15,000 in 2014 to 27,000 in 2017. This has resulted in significant skill gains for students in employment and independent living skills. Each student receives a report of their progress which is shared with school teams, teachers of the visually impaired, and DBVI counselors. Students learn to identify their strengths and areas of vocational interest. In 2017, 75% of the interns had enrolled in college programs, and the remaining 25% are working with their DBVI counselors to match their skills to a career path.

Quotes from LEAP Students:

- **"My favorite part of working at ReSOURCE was communicating and interacting with my other coworkers and customers because working with people effectively improved communication and customer service skills. I'll be more prepared for possible employment opportunities in the future."**
- **"I learned that there will always be changes that you aren't expecting at a workplace, and that it is good to ask questions and talk about them."**
- **"I am most proud of being able to run a broadcast on my own. I once thought that being blind was going to make radio impossible for me pursue, but this experience helped me understand my abilities."**
- **"I am proud of the fact that I was able to get to and from work independently, that I did my job well, and that I felt more confident as time went on."**

A. See Above (P.1.A.).

B. Describe the factors that impeded the achievement of the goals and priorities.

See Above (P.1.A.).

2. An evaluation of the extent to which the Supported Employment program goals described in the Supported Employment Supplement for the most recent program year were achieved. The evaluation must:

A. Identify the strategies that contributed to the achievement of the goals.

See Above (P.1.A.).

B. Describe the factors that impeded the achievement of the goals and priorities.

See Above (P.1.A.).

3. The VR program's performance on the performance accountability indicators under section 116 of WIOA.

DBVI is in the first year of building the performance measures baseline. The second year of the baseline will be PY 2019 from July 1, 2018 to June 30, 2019. Performance targets will be set for PY 20 that begins July 1, 2019.

4. How the funds reserved for innovation and expansion (I&E) activities were utilized.

See strategies about LEAP in (P.1.A.) above.

q. Quality, Scope, and Extent of Supported Employment Services.

Include the following:

1. The quality, scope, and extent of supported employment services to be provided to individuals with the most significant disabilities, including youth with the most significant disabilities.

See Above (P.1.A.).

2. The timing of transition to extended services.

See Above (P.1.A.).

Certifications

Name of designated State agency or designated State unit, as appropriate **Vermont Agency of Human Services**

Name of designated State agency **Vermont Agency of Human Services**

Full Name of Authorized Representative: **Al Gobeille**

Title of Authorized Representative: **Secretary of Agency of Human Services**

States must provide written and signed certifications that:

1. The **designated State agency or designated State unit (as appropriate) listed above** is authorized to submit the VR services portion of the Unified or Combined State Plan under title I of the Rehabilitation Act of 1973 (Rehabilitation Act), as amended by WIOA*, and its supplement under title VI of the Rehabilitation Act.** Yes
2. As a condition for the receipt of Federal funds under title I of the Rehabilitation Act for the provision of VR services, the **designated State agency listed above** agrees to operate and administer the State VR Services Program in accordance with the VR services portion of the Unified or Combined State Plan, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under section 111 of the Rehabilitation Act are used solely for the provision of VR services and the administration of the VR services portion of the Unified or Combined State Plan; Yes
3. As a condition for the receipt of Federal funds under title VI of the Rehabilitation Act for supported employment services, the designated State agency agrees to operate and administer the State Supported Employment Services Program in accordance with the supplement to the VR services portion of the Unified or Combined State Plan*, the Rehabilitation Act, and all applicable regulations, policies, and procedures established by the Secretary of Education. Funds made available under title VI are used solely for the provision of supported employment services and the administration of the supplement to the VR services portion of the Unified or Combined State Plan;** Yes
4. The designated State agency and/or the designated State unit has the authority under State law to perform the functions of the State regarding the VR services portion of the Unified or Combined State Plan and its supplement; Yes
5. The State legally may carry out each provision of the VR services portion of the Unified or Combined State Plan and its supplement. Yes
6. All provisions of the VR services portion of the Unified or Combined State Plan and its supplement are consistent with State law. Yes
7. The **Authorized Representative listed above** has the authority under State law to receive, hold, and disburse Federal funds made available under the VR services portion of the Unified or Combined State Plan and its supplement; Yes
8. The **Authorized Representative listed above** has the authority to submit the VR services portion of the Unified or Combined State Plan and the supplement for Supported Employment services; Yes
9. The agency that submits the VR services portion of the Unified or Combined State Plan and its supplement has adopted or otherwise formally approved the plan and its supplement. Yes

Footnotes

Certification 1 Footnotes

* Public Law 113-128.

** Unless otherwise stated, "Rehabilitation Act" means the Rehabilitation Act of 1973, as amended by WIOA, signed into law on July 22, 2014.

Certification 2 Footnotes

* All references in this plan to "designated State agency" or to "the State agency" relate to the agency identified in this paragraph.

** No funds under title 1 of the Rehabilitation Act may be awarded without an approved VR services portion of the Unified or Combined State Plan in accordance with section 101(a) of the Rehabilitation Act.

*** Applicable regulations, in part, include the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 76,77,79,81, and 82; 2 CFR part 200 as adopted by 2 CFR part 3485; and the State VR Services Program regulations.

Certification 3 Footnotes

* No funds under title VI of the Rehabilitation Act may be awarded without an approved supplement to the VR services portion of the Unified or Combined State Plan in accordance with section 606(a) of the Rehabilitation Act.

** Applicable regulations, in part, include the citations in *** under Certification 2 footnotes

Additional Comments on the Certifications from the State

Certification Regarding Lobbying — Vocational Rehabilitation

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization **State of Vermont--Agency of Human Services, Division for the Blind and Visually Impaired**

Full Name of Authorized Representative: **Al Gobeille**

Title of Authorized Representative: **Secretary, Vermont Agency of Human Services**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)

(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>). If applicable, please print, sign, and email to MAT_OCTAE@ed.gov

Certification Regarding Lobbying — Supported Employment

Certification for Contracts, Grants, Loans, and Cooperative Agreements The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Applicant's Organization **State of Vermont--Agency of Human Services, Division for the Blind and Visually Impaired**

Full Name of Authorized Representative: **Al Gobeille**

Title of Authorized Representative: **Secretary, Vermont Agency of Human Services**

SF LLL Form – Disclosure of Lobbying Activities (only if applicable)
(<http://www2.ed.gov/fund/grant/apply/appforms/appforms.html>).

Assurances

The designated State agency or designated State unit, as appropriate and identified in the State certifications included with this VR services portion of the Unified or Combined State Plan and its supplement, through signature of the authorized individual, assures the Commissioner of the Rehabilitation Services Administration (RSA), that it will comply with all of the requirements of the VR services portion of the Unified or Combined State Plan and its supplement, as set forth in sections 101(a) and 606 of the Rehabilitation Act. The individual authorized to submit the VR services portion of the Unified or Combined State Plan and its supplement makes the following assurances: **The State Plan must provide assurances that:**

1. Public Comment on Policies and Procedures:

The designated State agency assures it will comply with all statutory and regulatory requirements for public participation in the VR Services Portion of the Unified or Combined State Plan, as required by section 101(a)(16)(A) of the Rehabilitation Act.

2. Submission of the VR services portion of the Unified or Combined State Plan and Its Supplement:

The designated State unit assures it will comply with all requirements pertaining to the submission and revisions of the VR services portion of the Unified or Combined State Plan and its supplement for the State Supported Employment Services program, as required by sections 101(a)(1), (22), (23), and 606(a) of the Rehabilitation Act; section 102 of WIOA in the case of the submission of a unified plan; section 103 of WIOA in the case of a submission of a Combined State Plan; 34 CFR 76.140.

3. Administration of the VR services portion of the Unified or Combined State Plan:

The designated State agency or designated State unit, as appropriate, assures it will comply with the requirements related to:

a. the establishment of the designated State agency and designated State unit, as required by section 101(a) (2) of the Rehabilitation Act.

b. the establishment of either a State independent commission or State Rehabilitation Council, as required by section 101(a)(21) of the Rehabilitation Act.

The designated State agency or designated State unit, as applicable **(B) has established a State Rehabilitation Council**

c. consultations regarding the administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(16)(B) of the Rehabilitation Act.

d. the financial participation by the State, or if the State so elects, by the State and local agencies, to provide the amount of the non-Federal share of the cost of carrying out the VR program in accordance with section 101(a)(3).

e. the local administration of the VR services portion of the Unified or Combined State Plan, in accordance with section 101(a)(2)(A) of the Rehabilitation Act.

The designated State agency allows for the local administration of VR funds **No**

f. the shared funding and administration of joint programs, in accordance with section 101(a)(2)(A)(ii) of the Rehabilitation Act.

The designated State agency allows for the shared funding and administration of joint programs: **No**

g. statewideness and waivers of statewideness requirements, as set forth in section 101(a)(4) of the Rehabilitation Act.

Is the designated State agency requesting or maintaining a waiver of statewideness for one or more services provided under the VR services portion of the Unified or Combined State Plan? See Section 2 of this VR services portion of the Unified or Combined State Plan. **No**

h. the descriptions for cooperation, collaboration, and coordination, as required by sections 101(a)(11) and (24)(B); and 606(b) of the Rehabilitation Act.

i. all required methods of administration, as required by section 101(a)(6) of the Rehabilitation Act .

j. the requirements for the comprehensive system of personnel development, as set forth in section 101(a)(7) of the Rehabilitation Act.

k. the compilation and submission to the Commissioner of statewide assessments, estimates, State goals and priorities, strategies, and progress reports, as appropriate, and as required by sections 101(a)(15), 105(c)(2), and 606(b)(8) of the Rehabilitation Act.

l. the reservation and use of a portion of the funds allotted to the State under section 110 of the Rehabilitation Act for the development and implementation of innovative approaches to expand and improve the provision of VR services to individuals with disabilities, particularly individuals with the most significant disabilities.

m. the submission of reports as required by section 101(a)(10) of the Rehabilitation Act.

4. Administration of the Provision of VR Services:

The designated State agency, or designated State unit, as appropriate, assures that it will:

a. comply with all requirements regarding information and referral services in accordance with sections 101(a) (5)(D) and (20) of the Rehabilitation Act.

b. impose no duration of residence requirement as part of determining an individual's eligibility for VR services or that excludes from services under the plan any individual who is present in the State in accordance with section 101(a)(12) of the Rehabilitation Act .

c. provide the full range of services listed in section 103(a) of the Rehabilitation Act as appropriate, to all eligible individuals with disabilities in the State who apply for services in accordance with section 101(a)(5) of the Rehabilitation Act?

Agency will provide the full range of services described above **Yes**

d. determine whether comparable services and benefits are available to the individual in accordance with section 101(a)(8) of the Rehabilitation Act.

e. comply with the requirements for the development of an individualized plan for employment in accordance with section 102(b) of the Rehabilitation Act.

f. comply with requirements regarding the provisions of informed choice for all applicants and eligible individuals in accordance with section 102(d) of the Rehabilitation Act.

g. provide vocational rehabilitation services to American Indians who are individuals with disabilities residing in the State, in accordance with section 101(a)(13) of the Rehabilitation Act.

h. comply with the requirements for the conduct of semiannual or annual reviews, as appropriate, for individuals employed either in an extended employment setting in a community rehabilitation program or any other employment under section 14(c) of the Fair Labor Standards Act of 1938, as required by section 101(a)(14) of the Rehabilitation Act.

i. meet the requirements in sections 101(a)(17) and 103(b)(2) of the Rehabilitation Act if the State elects to construct, under special circumstances, facilities for community rehabilitation programs

j. with respect to students with disabilities, the State,

i. has developed and will implement,

A. strategies to address the needs identified in the assessments; and

B. strategies to achieve the goals and priorities identified by the State, to improve and expand vocational rehabilitation services for students with disabilities on a statewide basis; and

ii. has developed and will implement strategies to provide pre-employment transition services (sections 101(a)(15) and 101(a)(25)).

5. Program Administration for the Supported Employment Title VI Supplement:

a. The designated State unit assures that it will include in the VR services portion of the Unified or Combined State Plan all information required by section 606 of the Rehabilitation Act.

b. The designated State agency assures that it will submit reports in such form and in accordance with such procedures as the Commissioner may require and collects the information required by section 101(a)(10) of the Rehabilitation Act separately for individuals receiving supported employment services under title I and individuals receiving supported employment services under title VI of the Rehabilitation Act.

c. The designated state unit will coordinate activities with any other State agency that is functioning as an employment network under the Ticket to Work and Self-Sufficiency program under Section 1148 of the Social Security Act.

6. Financial Administration of the Supported Employment Program:

a. The designated State agency assures that it will expend no more than 2.5 percent of the State's allotment under title VI for administrative costs of carrying out this program; and, the designated State agency or agencies will provide, directly or indirectly through public or private entities, non-Federal contributions in an amount that is not less than 10 percent of the costs of carrying out supported employment services provided to youth with the most significant disabilities with the funds reserved for such purpose under section 603(d) of the Rehabilitation Act, in accordance with section 606(b)(7)(G) and (H) of the Rehabilitation Act.

b. The designated State agency assures that it will use funds made available under title VI of the Rehabilitation Act only to provide supported employment services to individuals with the most significant disabilities, including extended services to youth with the most significant disabilities, who are eligible to receive such services; and, that such funds are used only to supplement and not supplant the funds provided under Title I of the Rehabilitation Act, when providing supported employment services specified in the individualized plan for employment, in accordance with section 606(b)(7)(A) and (D), of the Rehabilitation Act.

7. Provision of Supported Employment Services:

a. The designated State agency assures that it will provide supported employment services as defined in section 7(39) of the Rehabilitation Act.

b. The designated State agency assures that:

i. the comprehensive assessment of individuals with significant disabilities conducted under section 102(b)(1) of the Rehabilitation Act and funded under title I of the Rehabilitation Act includes consideration of supported employment as an appropriate employment outcome, in accordance with the requirements of section 606(b)(7)(B) of the Rehabilitation Act

ii. an individualized plan for employment that meets the requirements of section 102(b) of the Rehabilitation Act, which is developed and updated with title I funds, in accordance with sections 102(b)(3)(F) and 606(b)(6)(C) and (E) of the Rehabilitation Act.

Additional Comments on the Assurances from the State

VII. Program-Specific Requirements For Combined State Plan Partner Programs

States choosing to submit a Combined State Plan must provide information concerning the six core programs—the Adult Program, Dislocated Worker Program, Youth Program, Wagner-Peyser Act Program, Adult Education and Family Literacy Act Program, and the Vocational Rehabilitation Program— and also submit relevant information for any of the eleven partner programs it includes in its Combined State Plan. When a State includes a Combined State Plan partner program in its Combined State Plan, it need not submit a separate plan or application for that particular program.* If included, Combined State Plan partner programs are subject to the “common planning elements” in Sections II and III of that document, where specified, as well as the program-specific requirements for that program (available on www.regulations.gov for public comment). The requirements that a State must address for any of the partner programs it includes in its Combined State Plan are provided in this separate supplemental document. The Departments are not seeking comments on these program-specific requirements, which exist under separate OMB control numbers and do not represent requirements under WIOA. For further details on this overall collection, access the Federal eRulemaking Portal at <http://www.regulations.gov> by selecting Docket ID number ETA-2015-0006.

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

Appendix 1. Performance Goals for the Core Programs

Each State submitting a Unified or Combined Plan is required to identify expected levels of performance for each of the primary indicators of performance for the two years covered by the plan. The State is required to reach agreement with the Secretary of Labor, in conjunction with the Secretary of Education on state adjusted levels of performance for the indicators for each of the two years of the plan. States will only have one year of data available under the performance accountability system in Section 116 of the WIOA; therefore, the Departments will continue to use the transition authority under WIOA sec. 503(a) to designate certain primary indicators of performance as “baseline” indicators in the first plan submission. A “baseline” indicator is one for which States will not propose an expected level of performance in the plan submission and will not come to agreement with the Departments on negotiated levels of performance. “Baseline” indicators will not be used in the end of the year performance calculations and will not be used to determine failure to achieve adjusted levels of performance for purposes of sanctions. The selection of primary indicators for the designation as a baseline indicator is made based on the likelihood of a state having adequate data on which to make a reasonable determination of an expected level of performance and such a designation will vary across core programs.

States are expected to collect and report on all indicators, including those that have been designated as “baseline”. The actual performance data reported by States for indicators designated as “baseline” in the first two years of the Unified or Combined Plan will serve as baseline data in future years.

Each core program must submit an expected level of performance for each indicator, except for those indicators that are listed as “baseline” indicators below.

For this Plan, the Departments will work with States during the negotiation process to establish the negotiated levels of performance for each of the primary indicators for the core programs.

Baseline Indicators for the First Two Years of the Plan

Title I programs (Adult, Dislocated Workers, and Youth):

- Measurable Skill Gains
- Effectiveness in Serving Employers

Title II programs (Adult Education):

- Employment in the 2nd quarter
- Employment in the 4th quarter
- Median Earnings
- Credential Attainment
- Effectiveness in Serving Employers

Title III programs (Wagner-Peyser):

- Effectiveness in Serving Employers

Title IV programs (Vocational Rehabilitation):

- Employment in the 2nd quarter
- Employment in the 4th quarter
- Median Earnings
- Credential Attainment
- Measurable Skill Gains
- Effectiveness in Serving Employers

States may identify additional indicators in the State plan, including additional approaches to measuring Effectiveness in Serving Employers, and may establish levels of performance for each of the State indicators. Please identify any such State indicators under Additional Indicators of Performance.

Table 1. Employment (Second Quarter after Exit)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
---------	------------------------	--------------------------	------------------------	--------------------------

Adults	72.00	72.00	Baseline	72.50
Dislocated Workers	80.00	69.00	Baseline	73.00
Youth	40.00	40.00	Baseline	41.00
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	64.00	60.00	Baseline	62.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 1

WIOA Performance Measures - Vermont	PY 18	PY 19
WIOA Title I Adults		
Employment (Second Quarter after Exit)	68.0%	68.5%
Employment (Fourth Quarter after Exit)	64.0%	66.0%
Median Earnings	\$4,530.00	\$4,620.00
Credential Attainment Rate	51.0%	52.0%
Measurable Skills Gains	Baseline	Baseline
Effectiveness in Serving Employers	Baseline	Baseline
WIOA Title I Dislocated Worker		
Employment (Second Quarter after Exit)	78.0%	79.0%
Employment (Fourth Quarter after Exit)	70.0%	74.5%
Median Earnings	\$8,051.00	\$8,212.00
Credential Attainment Rate	54.0%	56.0%
Measurable Skills Gains	Baseline	Baseline
Effectiveness in Serving Employers	Baseline	Baseline
WIOA Title I Youth		
Employment (Second Quarter after Exit)	50.0%	50.5%
Employment (Fourth Quarter after Exit)	48.5%	49.0%
Median Earnings	Baseline	Baseline
Credential Attainment Rate	35.2%	37.0%
Measurable Skills Gains	Baseline	Baseline
Effectiveness in Serving Employers	Baseline	Baseline
WIOA Title III Labor Exchange		
Employment (Second Quarter after Exit)	62.0%	63.0%
Employment (Fourth Quarter after Exit)	56.0%	58.0%
Median Earnings	\$4,760.00	\$4,855.00
Effectiveness in Serving Employers	Baseline	Baseline

Table 2. Employment (Fourth Quarter after Exit)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	71.00	60.30	Baseline	63.00
Dislocated Workers	84.00	70.30	Baseline	72.00
Youth	50.00	50.00	Baseline	51.00
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	64.00	55.10	Baseline	58.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 2

Table 3. Median Earnings (Second Quarter after Exit)

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	4,509.00	4,509.00	Baseline	4,600.00
Dislocated Workers	6,761.00	7,200.00	Baseline	7,250.00
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	5,111.00	5,111.00	Baseline	5,200.00
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 3

Table 4. Credential Attainment Rate

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	59.00	59.20	Baseline	61.00
Dislocated Workers	58.00	60.00	Baseline	61.00
Youth	50.00	35.20	Baseline	36.00
Adult Education	Baseline	Baseline	Baseline	Baseline
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 4

Table 5. Measureable Skill Gains

Program	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Adults	Baseline	Baseline	Baseline	Baseline
Dislocated Workers	Baseline	Baseline	Baseline	Baseline
Youth	Baseline	Baseline	Baseline	Baseline
Adult Education	37.00	Baseline	38.00	Baseline
Wagner-Peyser	n/a	n/a	n/a	n/a
Vocational Rehabilitation	Baseline	Baseline	Baseline	Baseline

User remarks on Table 5

Table 6. Effectiveness in Serving Employers

Measure	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
Line 1 (enter the measure information in the comments below)				
Line 2				
Line 3				
Line 4				
Line 5				
Line 6				

User remarks on Table 6

Table 7. Additional Indicators of Performance

Measure	PY 2018 Expected Level	PY 2018 Negotiated Level	PY 2019 Expected Level	PY 2019 Negotiated Level
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User remarks on Table 7

Appendix 2. Other State Attachments (Optional)

One-Stop American Job Center Service Coordination and Delivery In Vermont Memorandum of Understanding between *Vermont State Workforce Development Board*

and the *Required and Additional Partners of the American Job Center Network*

I. PARTIES

This Memorandum of Understanding (MOU) is entered into by Vermont’s State Workforce Development Board (“SWDB”); the Vermont Department of Labor (“VDOL”); Northlands JobCorps; ReSOURCE A Nonprofit Community Enterprise, Inc. (“ReSOURCE”); the Vermont Agency of Education (“AOE”); the Vermont Department of Disabilities, Aging, and Independent Living, Division of Vocational Rehabilitation (“DVR”); the Vermont Department of Disabilities, Aging, and Independent Living, Division for the Blind and Visually Impaired (“DBVR”); the Vermont Department for Children and Families, Economic Services Division (“ESD”); Vermont Associates for Training and Development (“Vermont Associates”); PathStone; Maquam Bay of Missisquoi, Inc.; and Champlain Valley Office of Economic Opportunity (“CVOEO”), as required one-stop partners under the Workforce Innovation and Opportunity Act (WIOA) of 2014, 29 U.S.C. §3151(b) and (c).

Other parties to this agreement are the Vermont Department of Corrections (“DOC”), Community College of Vermont (“CCV”), Vermont Technical College (“VTC”), and the

Vermont Student Assistance Corporation ("VSAC") who sign as additional partners without the obligation to contribute funding under section VI of this agreement.

II. SCOPE

This MOU is intended to describe the roles and responsibilities of One-Stop partner programs in the Vermont American Job Center (AJC) Network generally and the Burlington comprehensive AJC specifically. The partners executing this MOU acknowledge and agree that this document is not a contract, and the MOU does not create, or otherwise give rise to, any contractual rights or obligations between the partners and their representatives. Each partner's responsibilities, which are generally summarized in this MOU, may only be legally enforced in the event relevant partners execute a separate contract. The MOU memorializes, in writing, the way the partners will work collaboratively together to satisfy the federal regulations for the Vermont AJC Network and is not designed to create contractual obligations that would be enforceable by court order.

This MOU does not replace or supersede any prior agreements entered into by any partner described in the MOU, including but not limited to separate agreements partners have executed.

III. AUTHORITY

The Workforce Innovation and Opportunity Act (WIOA) requires the SWDB, with the agreement of the Governor, to develop and enter into an MOU between the SWDB and One-Stop partners, concerning the operation and funding of Vermont's AJC Network. 29 U.S.C §3151. This requirement is further described at 20 CFR §678.500, 34 CFR §361.500, and 34 CFR §463.500, and in federal guidance issued by the US Dept. of Labor, US Dept. of Education, and US Agency of Health & Human Services.

Additionally, the sharing and allocation of infrastructure costs among One-Stop partners is governed by 29 U.S.C. §3151(h), its implementing regulations, and the Federal Cost Principles contained in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 CFR part 200.

IV. INTENT

Parties intend for this MOU to serve as a framework for developing and aligning Vermont's workforce preparation and employment system so that it meets the needs of businesses, job seekers, and those who want to further their careers. In designing a "one-stop" system of service delivery, program partners will become connected to one another in ways that will promote integration, innovation, and better employment outcomes for Vermont businesses and job seekers. A closely aligned system of workforce development programs will help all of Vermont's jobseekers and businesses access the broad array of services and supports available to them through a more robust and personalized delivery system. Partners believe the system will grow stronger as the network embraces best practices, makes evidence-based decisions, and stays accountable to customers by focusing on continuous improvement and solicited feedback.

In general terms, WIOA is designed to increase access to opportunities for the employment, education, training, and support services for all citizens, particularly those with barriers to employment. The Vermont AJC Network will support the alignment of workforce investment, education, and economic development systems to create a comprehensive, accessible, and high-quality workforce development system. It will strengthen the quality and labor market relevance of workforce investment, education, and economic development efforts to provide Vermont's workers with the skills and credentials necessary to secure and advance in employment with good-paying jobs to provide Vermont's businesses with the skilled workers the employers need to succeed in a global economy.

V. TERMS OF AGREEMENT

a. American Job Center (AJC) Location

Vermont's sole comprehensive one-stop AJC is located at 63 Pearl St, Burlington, VT 05401 and is referred to in this MOU as the "Burlington AJC."

b. Common Identifier for Branding

The required parties agree to use the federally designated branding protocols, either through use of the approved logo or printing "American Job Center network" or "A Proud Partner of the American Job Center network" on branded electronic resources and any newly printed, purchased or created materials.

c. Career Services Coordination and Delivery

At a minimum, parties agree that all of the required career services described in 20 CFR §678.430, access to training services described in 20 CFR §680.200, access to any employment and training activities carried out under 29 U.S.C. §3151(b)(1)(B), access to programs and activities carried out by one-stop partners listed in §§678.400 through 678.410, including the Employment Service program authorized under the Wagner-Peyser Act, as amended by WIOA title II, and workforce and labor market information will be available at the Burlington AJC.

Parties agree to provide applicable career services listed in Table 1 (attached) and defined in Table 2 (attached) and further detailed statewide in Table 5 (attached) through walk-in appointments, scheduled one-on-one appointments, group orientations, and self-service resources. Where appropriate, partners who provide the same career services agree to deliver those services in a coordinated manner and will involve the One-Stop Operator in the design of the process as needed. VDOL has been selected by the SWDB as the One-Stop Operator from July 1, 2017 - June 30, 2021. The duties of the One-Stop Operator are further described in subsection (e) of this agreement.

At least one Title I staff person will be physically present during regular business hours and customers will have access to all programs, services, and activities described in this section. For the purposes of this agreement, "access" means that a program staff member or a staff member from a different program who is appropriately trained, will be physically present at the Burlington

AJC, or that a direct connection via phone or real-time Web-based communication will be available at the Burlington AJC to connect a customer with a program staff member who can provide information or services to the customer, within a reasonable time.

In addition, some programs are coordinating delivery of services both in and outside of the Burlington AJC. The following list provides some examples of inter-program service delivery collaboration:

- Local adult education staff attend AJC group orientations and other information sharing meetings with job seekers and other clients, as appropriate, to describe services available through adult education. Adult education staff meets with individual clients at the AJC by appointment to facilitate access to services. Local adult education centers also make space available on at least a bi-weekly, half-day basis for partner staff to meet with co-enrolled clients.
- DBVI provides vocational rehabilitation services to individuals who are blind or visually impaired through Blind Services Counselors in four regional offices, available by referral and appointment.
- Participants in the Senior Community Service Employment Program (SCSEP) receive eligibility determination, supportive service referrals, and enrollment assistance at local Mature Worker Resource Centers (several of which are co-located with American Job Centers in VT). "On-site" training services are received at nonprofit partner locations in the general community, and "off-site" training services are received either virtually or at the facilities local training providers (community colleges, local libraries, etc.).
- The Unemployment Insurance (UI) program offers virtual services through a direct connection to the VDOL UI Claims Center for initial claims and online access to file additional claims. RESEA services are offered directly through the Burlington AJC through a dedicated full-time staff member.
- Burlington AJC intake specialists are trained by CVOEO on their Micro-Business Program and Community Kitchen Academy. Staff can assist customers in connecting with these programs through a specially arranged referral system.
- The Vermont Educational Opportunity Center program is a Federal TRIO program at VSAC with full statewide reach for adults looking to improve their employability. Through individual counseling and group workshops in the Burlington AJC, other career resource centers, and other community locations, participants receive assistance through career exploration activities, financial aid and admission applications, and postsecondary enrollment. Staff are available at the Burlington AJC and co-located at many other career resource centers.
- Economic Services staff trains VDOL staff to screen for Reach Up/3SquaresVT eligibility and makes off-site Economic Services staff available to accommodate an immediate referral via Skype.
- AJC staff are oriented to the CCV and VTC brochures and degree/certificate program listings; websites; contact information for admissions personnel so that they may assist customers in appropriate outreach.
- A VR counselor is on-site in the Burlington AJC part time on a regular basis. When a counselor isn't present, referrals are made via Skype where customers are provided with an overview of services and given the date of the next orientation to VR services.

d. Infrastructure Cost Share Agreement

Required Partners. Section 121(b)(1)(B) of WIOA identifies the programs responsible for sharing the infrastructure costs of the Burlington AJC. The partners who administer these programs and carry this responsibility are as follows: WIOA Title I Adult Program, VDOL; WIOA Title I Dislocated Worker Program, VDOL; WIOA Title I Youth Program, VDOL; Job Corps, Northlands JobCorps; YouthBuild, ReSource; Migrant and Seasonal Farmworker Programs, PathStone; Wagner-Peyser Act Employment Service Program, VDOL; WIOA Title II Adult Education and Family Literacy Act program, AOE; WIOA Title IV Vocational Rehabilitation Program, DVR and DBVR; Senior Community Service Employment Program, DVR and Vermont Associates; Perkins Career and Technical Education Programs at the Postsecondary Level, AOE; Title II Trade Act Trade Adjustment Assistance Activities, VDOL; Jobs for Veterans State Grants Programs, VDOL; Employment and Training Activities under the Community Services Block Grant, CVOEO; and state Unemployment Compensation program, VDOL; Temporary Assistance for Needy Families, ESD.

Burlington AJC Programs. In addition to the required partner programs listed above, the following entities provide services out of the Burlington AJC: Vermont's Reemployment Services and Eligibility Assistance Program ("RESEA"), VSAC, and Vermont HITEC. In calculating the proportional infrastructure use of the Burlington AJC these programs will be included. VDOL agrees to assume financial responsibility for their proportional share of the infrastructure cost.

Use of Federal Funds to Maintain Burlington AJC. Each entity that carries out a program or activity in the Burlington AJC will use a portion of their available funds to maintain the one-stop delivery system, including payment of the infrastructure costs for the Burlington AJC. These payments will be in accordance with 20 CFR § Subpart E; federal cost principles, which require that all costs must be allowable, reasonable, necessary, and allocable to the program; and all other applicable legal requirements.

Shared Costs. Table 3 identifies three categories of costs that will be shared by the Burlington AJC required partners: Infrastructure, Shared Services, and Shared Costs.

Infrastructure Costs. The cost categories listed under Infrastructure represent the costs that will be billed proportionally to all twenty programs on a quarterly basis, as accrued. The total amount assessed to programs for the Shared One-Stop Space will not exceed sixteen percent of the total proportional amount budgeted for the Burlington AJC. Partner programs who are also co-located in the building, will be assessed \$7.12 per square foot of space that the program occupies.

Additional Costs. Table 3 limits the amounts and types of Shared Services and Additional Costs expenditures that may be proportionally assessed to the partner programs. Each program will be assessed a one twentieth share of the Additional Costs on a quarterly basis, after costs have been incurred.

Duration. Partners named in this section agree to share the cost of maintaining the Burlington AJC infrastructure, as outlined above, from January 1, 2018 to June 30, 2018.

e. Business Practices

Parties to this agreement will follow their agency's or program's business practices in the provision of services under this MOU. These practices include, but are not limited to, those related to auditing, employee personnel practices, employee and

client confidentiality, insurance, procurement, record keeping and retention, and employee and client confidentiality.

f. Management of the Burlington AJC and Vermont's AJC Network

Parties recognize and respect that each agency has different philosophies, policies, practices and day-to-day operation and supervision requirements.

Parties acknowledge that the role of the designated One-Stop Operator ("Operator") is to coordinate the delivery of services by required One-Stop partners and service providers both within the Burlington AJC and across the Vermont AJC Network. Partners agree to assist the Operator in performance of its duties as necessary. Other responsibilities of the Operator include, but are not limited to:

- Providing reports and other information as required by the SWDB. The Operator will make available to the SWDB sufficient information to enable the SWDB to oversee the Vermont AJC Network, and to ensure that funds are appropriately used, managed, and invested in order to maximize performance outcomes. The required frequency and content of the reported information shall be determined by the SWDB, but shall be provided at a minimum on an annual basis.
- Assisting in the development of MOUs between the SWDB and the One-Stop partners that fully describe the roles and responsibilities of each One-Stop partner, including sharing the infrastructure and additional shared costs related to Vermont's AJC Network. Developing processes to ensure that all customers receive appropriate, timely, and effective career services.
- Coordinating reception and initial registration services for all customers.
- Coordinating access to virtual resources at appropriate partner locations, libraries, and other points within the state workforce area.
- Identifying and recruiting additional system partners and resources.
- Performing continuous improvement activities to achieve high-level service quality and exceptional customer service, including: reviewing the various resources and services available to customers on an ongoing basis, and identifying additional services or enhancements; and measuring customer satisfaction, reviewing results, and making recommendations for improvement.
- Handling and resolving complaints related to the Burlington AJC and the Vermont AJC Network in accordance with an approved grievance procedure.
- Developing and implementing a coordinated staff development and training plan for the Burlington AJC and Vermont AJC Network.
- In coordination with the One-Stop partners, developing and implementing a formal referral process, including referral forms, as described in subsection (f) of this agreement. Ensure alignment of resources, services, and data as outlined in the State Plan.
- Monitoring compliance with all federal and state laws, regulations, policies, and procedures related to the Vermont AJC Network, including the Burlington AJC.

g. Customer Referrals

Vermont's AJC Network is designed to share service delivery infrastructure, empowering all partner organizations to provide the widest array of high-quality services to meet customer needs. Parties agree to create a policy for making and following-up on referrals and review it annually to ensure that the system is effective, efficient, and helpful to customers.

In addition, parties agree to:

- Participate in a customer focused referral system that seamlessly accesses resources from involved partners to increase quality outcomes;
- Offer customers information on how to apply for a partner's services and arrange an appointment for the customer, if needed;
- Identify a partner referral liaison for each program partner;
- Provide ongoing training to all partner frontline staff in individual program services and eligibility; and
- Establish a standard of real-time referrals to all applicable local program partners.

Two key resources will be created and continuously updated to assist all partners in customer referral.

1. Directory of Services - This information, provided and maintained by the partners, consists of a program description and relevant scheduling information for available services.
2. Directory of Program Contacts - This information, provided by the partners, will consist of a single point of contact as well as an alternate for each program accepting referrals.

h. Confidentiality

Customer information will only be shared in accordance with each partner's respective confidentiality requirements. If shared, the information will be made available within a reasonable timeframe.

Information about Vocational Rehabilitation customers may only be shared if the customer has signed a written release.

Information may only be shared for the period of time specified in the release and only with the persons identified in the release.

Personally identifiable information obtained from customers of specific programs during outreach, intake, system orientation, initial assessment, referral to a partner programs, referral to supportive services, or otherwise is confidential and will not be released, disclosed or re-disclosed without obtaining the proper program specific release. Parties agree to work with the One Stop Operator to design information sharing protocols for one stop partners that complies with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Family Educational Rights and Privacy Act (FERPA), and any other relevant federal or state privacy laws.

i. Accessibility

Activities, employment, information and services available to job seekers and employers through the Vermont AJC Network and the Burlington AJC must be both physically and programmatically accessible to all people. A person's race, creed, color, national origin, marital status, sex, sexual orientation, gender identity, age, political affiliation or belief, disability, veteran's status, or physical or mental condition will not impede their ability to access services, events, or programs.

Parties will comply with all relevant federal and state laws and regulations, including the Nondiscrimination and Equal Opportunity Provisions of WIOA, the Fair Employment and Housing Act; ADA Amendments Act of 2008, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Title VI of the Civil Rights Act of 1964.

Parties will comply with all relevant federal and state laws and regulations, including the Nondiscrimination and Equal Opportunity Provisions of WIOA, the Fair Employment and Housing Act; the Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Title VI of the Civil Rights Act of 1964.

Staff Training. Parties agree to assist the One-Stop Operator in coordinating ongoing trainings and sharing information so that program staff are trained in ways to modify environments, procedures, and information dissemination to avoid discrimination and to meet individual needs. Trainings will include instruction on how to provide services for all customers in compliance with the laws referenced above and best practices concerning accessibility, inclusiveness, and universal design.

Partners in Vermont's AJC Network will ensure that all locations where program services are available to customers meet the standards of physical and programmatic accessibility described below.

Evaluations of the Burlington AJC's physical and programmatic accessibility will include how customers with disabilities can access, fully participate in, or benefit from available services compared to customers without disabilities.

Physical Accessibility

Physical accessibility refers to the extent to which facilities are designed, constructed, or altered so they are accessible to and usable by individuals with disabilities. AJC partners will use universal design and human-centered design strategies to help all customers access services. Evaluations of physical accessibility will take into account exterior and interior accessibility and will include criteria evaluating how well the AJCs and delivery systems take actions to comply with disability-related regulations implementing WIOA section 188.

Location and Facility. The Burlington AJC is accessible by public transportation, driving, biking, or walking. The center's sign is clearly marked and visible from a main road. The required number parking spaces are dedicated and marked for individuals with disabilities and are located closest to an accessible entrance.

The physical layout of the Burlington AJC eliminates structural barriers to mobility and is accessible to individuals of all capabilities. The building complies with the most recent ADA standards for Accessible Design and the Uniform Federal Accessibility Standards. The center's layout supports a culture of inclusiveness, guided by laws and regulations referenced above.

Workspaces and Assistive Technology. All public workspaces will be physically accessible to all customers by July 1, 2018 and will include assistive technology for customer use. A plan will be implemented to select, install, maintain, and update assistive technology based on customer's needs. Staff will also be trained on the use of the assistive technology so they can support customers needing the tools to access services.

Hours of Operation. The Burlington AJC provides maximum access to partner program services during regular business hours. Partner staff will consider the unique work, childcare, or transportation needs of participants and try to offer flexibility in scheduling whenever possible.

Programmatic Accessibility

Programmatic accessibility means that services and activities provided through Vermont's AJC Network, specifically those provided in the Burlington AJC, will be offered and delivered in a way that enables all eligible job seekers and employers to participate regardless of their range of abilities, age, culture, learning style, intelligence, or education level, in the most integrated setting appropriate.

All customers with disabilities will be reasonably accommodated so that they are able to interact and communicate with service providers in the most conducive environment available. Accommodations will also be made for individuals who have communication challenges, such as individuals who are deaf or hard of hearing, individuals with vision impairments, and individuals with communication disorders.

Communication. Staff will communicate with persons with disabilities as effectively as with others, and provide appropriate auxiliary aids, services, or other accommodations as needed. Individuals with disabilities seeking information or services from the Burlington AJC will have equal access to all information and data provided by the center.

Resources through the Burlington AJC will be accessible to individuals with disabilities and made available in multi-lingual versions. Translation services will be available, as needed, for all customers and service providers. All information, including that which is in digital format, will be clearly identified, communicated in a way that the public can understand and use, and fully accessible for individuals utilizing assistive technology tools. Information will be presented in a way that is compliant with federal and state law.

Virtual Accessibility. Customers will have access to all partner program services in the Burlington AJC onsite or via technology located at the center in compliance with WIOA's "direct linkage" requirement further described in 20 CFR 678.305. Phone, real-time web-based communications, or other technology will be physically present, enabling real-time interactions either on-demand or within a reasonable time. Parties agree to establish a policy that defines and describes a reasonable response time and protocol and agree that partner program staff located remotely and at the Burlington AJC will comply with the policy.

AJC partners will work to ensure that job seekers and businesses have access to the same information online as they do in a physical facility. All information kept virtually will be updated regularly to ensure dissemination of correct information. Partners will either have their own web presences via a website or social media, or will enter into a separate agreement with another partner program to post content through its website. Partners will assure that their websites are fully accessible for customers utilizing assistive technology tools.

VI. ONE-STOP AMERICAN JOB CENTER (AJC) OPERATING BUDGET

29 U.S.C. §3151(h) requires that one-stop partners use a portion of the funds available to them to maintain a one-stop service delivery system. The required parties to this MOU agree to jointly fund Vermont’s AJC Network infrastructure and shared services out of the Burlington AJC. The shared services budget described in Table 3 (attached) was negotiated and agreed upon by all the required partners.

Table 4 (attached) totals the individual budgets for programs offering services through the Burlington AJC.

VII. CONFLICT RESOLUTION

Parties agree to attempt in good faith to resolve disputes regarding policy or practice among themselves. If policy or practice disputes cannot be resolved at this level, parties will work with the One-Stop Operator to settle the disagreement. If necessary, parties may solicit support from the SWDB to resolve outstanding disputes. The SWDB shall be the final arbiter of disputes related to the funding and operation of the Vermont AJC Network and Burlington AJC.

VIII. INDEMNIFICATION

Nothing in this agreement shall be deemed to constitute a waiver of the sovereign immunity of the State. Each non-state party to this agreement shall defend, indemnify and hold harmless the State, its officers and employees, from and against any and all losses suffered by the State, its officers and employees, from and against any and all claims, liabilities or penalties asserted against the State, its officers and employees, by or on behalf of any person, arising out of the acts or omissions of the non-state party.

IX. AMENDMENTS

This agreement may be modified or amended at any time, provided that all parties are in mutual agreement. Modifications or amendments shall be in writing, signed by the parties to this agreement, and attached to the original agreement.

X. DURATION

The term of the MOU is from July 1, 2017 to July 1, 2018 and shall be effective upon signature by the parties’ authorized representatives

XI. SIGNATURES

The organizations listed below are required partners of Vermont’s AJC Network, unless otherwise noted.

Frank Cioffi Date
Chair, State Workforce Development Board

Lindsay Kurrle Date
Commissioner, Vermont Department of Labor

Heather Bouchey Date
Deputy Secretary, Agency of Education

Diane Dalmasse Date
Director, Division of Vocational Rehabilitation

Fred Jones Date
Director, Division for Blind and Visually Impaired

Sean Brown Date
Deputy Commissioner, Economic Services Division Director, Reach-up/TANF

Pat Elmer Date
President and CEO, Vermont Associates for Training & Development

Jan Demers Date
Executive Director, Champlain Valley Office of Economic Opportunity

Jeff Lewis Date
Vice-President, Pathstone

Alicia Grangent Date

Center Director, Northlands JobCorps

Louise Larivee Date

WIOA Director, Maquam Bay of Missisquoi, Inc.

Thomas Longstreth Date

Executive Director, ReSOURCE A Nonprofit Community Enterprise, Inc.

Lisa Menard Date

Commissioner, Department of Corrections*

Joyce Judy Date

President, Community College of Vermont*

Pat Moulton Date

President, Vermont Technical Center*

Patrick Leduc Date

Vice-President, Vermont Student Assistance Corporation*

* = Not a required partner under 20 CFR §678.400

Table 1: Services Provided in Burlington AJC

Services	Adult DW	Youth Ed	Adult Ed	Wagner-Peyser	VR	DBVI	SCSEP	TAA	RESEAU	UI	Vets	Pathston	Native America	VOE	Corps	ReSOURCE
Eligibility for Title I services	X	X	X	O	X	X	X	X								
Outreach, intake, system orientation	X	X	X	X	O	X	X	X	X	X	X	X	X	X	X	X
Initial assessment	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Labor exchange services	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Referrals to programs	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Labor market information	X	X	X	X	X	O	X	X	X	X	X	X	X	X	X	
Performance & program cost of	X	X	X	O	O	X	X	X	X							
Eligible Providers																
Referrals to supportive services	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
UI information and assistance	X	X	X	X	X	X	X	X	X							
Financial aid information	X	X	X	X	X	X	O	X	X	X	O	X	X	X		
Comprehensive assessment	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	O
Individual employment plan	X	X	X	O	X	X	X	X	X	X	X	X	X	O		
Career planning & counseling	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	O
Short-term pre-vocational services	X	X	X	X	X	X	X	X	X	X	O					
Internships and work experiences	X	X	X	X	X	X	X	X	X	X	X	X	X			
Out of area job search and relocation assistance	X	X	X	X	X	X	X	X	O	O	X	X				
Financial literacy services	X	X	X	X	X	X	X	X	X	X	O	X	X			
English language acquisition and integrated education	X	X	X	O	X	X	O									
Workforce preparation	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Follow-up services	X	X	X	O	X	X	X	X	X	X	X	X	X	X	X	X

Table 2: Definitions of Services

In the following definitions, "customer" is equivalent to participant, consumer, client, student, or recipient, as used by the various partners.

Basic Career Services (20 CFR §678.430(a) and §678.435)

Eligibility for Title I Services - Determination of whether a customer is eligible to receive services from the Adult, Dislocated Worker, or Youth programs. Outreach, Intake, and System Orientation - Outreach is intended to promote awareness of the availability of the System services to/for individuals and businesses that may need these services. Intake and System orientation is the process of gathering basic information to determine the program(s) appropriate for the customer, and providing the customer with information on the services available to determine if he/she is interested in pursuing those services. Note: "SYSTEM" means the One-Stop System where all required partners make their services available. Initial Assessment - The collection and assessment of information on a customer's skill levels, including literacy, numeracy, and English language proficiency; work history; employment barriers; employment goal(s) and occupational knowledge; supportive service needs; and whether referrals to other programs are appropriate or necessary. Labor Exchange Services - Providing job search and placement services to the customer, including but not limited to, information on in-demand industry sectors and occupations and non-traditional employment, when appropriate; development of a work search plan; placement in workshops; posting jobs on the state job bank; providing job matching and referrals; and advising how to maintain a record of job search. In some instances, programs may require their customers to maintain and submit a log detailing the amount of time spent on job search activities including identifying, applying, and interviewing for potential jobs, and time spent preparing and sending follow-up material to businesses. Labor exchange services also include appropriate recruitment and other business services, which may include, but are not limited to, customized screening and referral of qualified customers in training services to businesses; customized services to businesses, business associations, or other such organizations, on employment-related issues; customized recruitment events for businesses and targeted job fairs; human resource consultation services which may include writing/reviewing job descriptions and employee handbooks, developing performance evaluations and personnel policies, creating orientation sessions for new employees, honing job interview techniques for efficiency and compliance, analyzing employee turnover, creating job accommodations and using assistive technologies, and explaining labor law to help businesses comply; and customized labor market information for specific businesses, sectors, industries, or clusters. Referrals to Programs - Referrals and coordination of activities with other appropriate programs and services that meet specific customer needs, assist them in overcoming barriers to employment, and provide services to gain/retain employment. These other programs and services may include, but are not limited to, employment and training services; treatment for alcohol, substance abuse or mental health issues; Unemployment Insurance benefits; Workers' Compensation; VT Disability Insurance; and vocational rehabilitation services. Labor Market Information - Staff provides workforce and labor market employment statistics to assist job seeking customers in the development of employment goal(s) and businesses in the development and implementation of sector partnerships and career pathways. The employment statistics include local, regional, and national labor market conditions; career counseling and career exploration services; characteristics of industries, occupations, and the workforce area; business-identified skill needs; short and long-term industry and occupational growth and salary projections; worker supply and demand; and high-growth and high-demand industries. Performance and Program Cost of Eligible Providers - The provision of performance information and program cost information on eligible providers of education, training, and workforce services by program and type of provider. Referrals to Supportive Services - Staff provides customers with referrals to supportive services that enable the customer to participate in authorized WIOA activities. Based on various partners' programmatic rules and regulations, these supportive services may include, but are not limited to, transportation; child care; dependent care; housing; needs related payments; interpreter services; reasonable accommodation for youth with disabilities; legal aid services; assistance with uniforms or other appropriate work attire; assistance with books, fees, and school supplies; payments and fees for employment and training related applications, tests, and certifications; and tools or instruments. Depending on the program, when appropriate, information may also be provided to customers on how to continue these supportive services after program services are completed. Unemployment Insurance (UI) Information and Assistance - Career Center and UI staff provides information and meaningful assistance to individuals seeking assistance in filing a claim for unemployment compensation. Meaningful assistance means providing assistance on-site using staff that is well trained in UI compensation claims filing and the rights and responsibilities of claimants or providing assistance by phone or via other technology as long as the assistance is provided by trained and available staff within a reasonable time. Financial Aid Assistance - Providing assistance in establishing eligibility, accessing, and applying for programs of financial aid for training and education programs not provided under WIOA.

Individualized Career Services (20 CFR §678.430(b))

Comprehensive Assessment - Staff conducts a specialized assessment of a job seeker's barriers to employment, occupational and employment goal(s), educational and skill levels, and personal circumstance to determine his/her service needs. This may include diagnostic testing and use of other assessment tools, and in-depth interviewing and evaluation. Under WIOA Title I, the comprehensive assessment is used to develop the Individual Employment Plan (IEP), while under Title IV, it is used to develop the Individualized Plan for Employment (IPE). Individual Employment

Plan (IEP)/Individualized Plan for Employment (IPE) - The IEP/IPE identifies the appropriate employment goal(s) chosen by the customer. The initial and comprehensive assessment is used to develop the IEP/IPE in consultation with the customer. The plan outlines the necessary services to be provided to achieve the planned goals; steps and timelines for achieving the goals; and the terms, conditions, and responsibilities associated with the plan. The IEP for Title I Adult/DW/Youth programs also includes information about eligible training providers, when applicable. The IPE for Title IV Vocational Rehabilitation Programs must also include those specific rehabilitation services needed to achieve the employment outcome, including assistive technology devices and services, when applicable. **Career Planning and Counseling -** One-on-one or intensive career planning and counseling with a professional counselor uses initial and comprehensive assessments and the IEP/IPE, and aims at enhancing job seeking and retention skills and career advancement of customers by:

- Helping the customer analyze and understand career information, and gain a better understanding of his/herself using career information gained through assessment tools and counseling strategies to more realistically choose or change short and long-term occupational goals; and
- Preparing service strategies to assist in the achievement of occupational goal(s) and to ensure customers have access to necessary workforce activities and supportive services, which may include, but are not limited to, drug and alcohol abuse counseling, mental health counseling, and referrals to partner programs appropriate to the needs of the customer.

Counseling may also include notification of available training in entrepreneurial skills which may include, but is not limited to, taking initiative; creatively seeking out and identifying business opportunities; developing budgets and forecasting resource needs; understanding options for acquiring capital; and communicating effectively to market oneself and ideas. **Short-term Pre-Vocational Services -** Development of skills customers need to live independently and enter the workforce fully prepared to engage in employment. These services may include academic education and job readiness trainings for development of work readiness skills, including but not limited to, learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, higher-order reasoning, problem-solving skills, work attitudes, and professional conduct. **Internships and Work Experience -** Based on partners' programmatic rules and regulations, the work experience is a planned, structured learning experience, in most cases linked to a career, that takes place in a private for-profit, non-profit or public sector workplace. For most partner programs, work experiences may be in the form of internships, work-study, externship, on-the-job training, apprenticeship, summer employment for youth, and/or other work placement opportunities. The purpose of a work experience is to provide the customer with an understanding of the work environment and job responsibilities, specific work skills, and experience on how the customer performs in the work setting. **WIOA Title I Youth work experiences** also include an academic and occupational education component. Partners follow all applicable work experience requirements for their respective program's State and Federal rules and regulations. **Out of Area Job Search and Relocation Assistance -** Staff provides information on labor exchange

activities in other local areas, regions, or states and whether businesses the customer may be interested in offer assistance with relocation. Allowable relocation expenses may be paid to eligible customers by the appropriate program. Financial Literacy Services - Educate and support customers to gain the knowledge, skills, and confidence to make informed financial decisions that enable them to attain greater financial health and stability by using high quality relevant learning strategies. The learning, where possible, may include, but is not limited to, creating a budget; initiating checking and/or savings accounts at banks; learning how to effectively manage spending, credit, and debt; learning how to protect against identity theft; and benefits advisement. These services may also include opportunities to put financial literacy lessons into practice, based on the needs of the customer. English Language Acquisition and Integrated Education - Adult Education staff provides an integrated program of services that incorporates English literacy and civics education concurrently and contextually with workforce preparation and training for a specific occupation/sector for the purpose of educational and career advancement of customers. These services allow customers to attain economic self-sufficiency and are designed for partnerships among adult education programs and postsecondary educational institutions, training providers, and/or businesses. Other partners provide direct linkages and information on how to locate and enroll in English as a Second Language (ESL) or English for Speakers of Other Languages (ESOL) classes. Workforce Preparation - Activities to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in utilizing resources, using information, working with others, understanding systems, and obtaining skills necessary for successful transition into and completion of postsecondary education, training, or employment and other employability skills that increase an individual's preparation for the workforce. For Adult Education these activities are incorporated into all literacy instruction. Follow-Up Services (20 CFR §678.430(c))

Depending upon the individual partner's programmatic rules and regulations, follow-up services may include counseling regarding the workplace for customers in adult or dislocated worker programs, who are placed in unsubsidized employment, for up to 12 months after the first day of employment. For youth programs, the follow-up services include critical services provided following a youth's exit from the program to help ensure the youth is successful in employment and/or postsecondary education and training. These services may include regular contact with a youth's business and education provider, including assistance in addressing work-related or education-related problems that arise.

Table 3: Burlington AJC Budget - Shared Services

Table 3.

Burlington One-Stop AJC Budget Infrastructure

Budget category	Building Budget	Budget Amount	One Stop Shared Amount
Alarm Monitoring	\$1,000.00	\$1,000.00	
Building Maintenance Contract	\$25,000.00	\$25,000.00	
Computers/printers/Fax/Copier	\$5,500.00	\$5,500.00	
Copier Maintenance Contract	\$2,500.00	\$2,500.00	
Janitorial Services	\$25,000.00	\$25,000.00	
Janitorial Services Rugs/Mats	\$2,000.00	\$2,000.00	
Maintenance/Repairs	\$6,000.00	\$6,000.00	
Maintenance/Repairs Supplies	\$500.00	\$500.00	
Newspaper Delivery	\$300.00	\$0.00	
Office Furnishing	\$1,000.00	\$0.00	
Paper Shredding Service	\$650.00	\$650.00	

Phone Expense - Dii/Cell	\$12,000.00	\$1,560.00
Postage Machine/Postage	\$700.00	\$700.00
Property Ins State Policy	\$2,348.00	\$0.00
Snow removal	\$17,000.00	\$17,000.00
Supplies - Purified Water	\$650.00	\$650.00
Supplies - Office	\$9,000.00	\$0.00
Supplies - Restrooms/Cleaning/1st aid Kit	\$1,500.00	\$1,500.00
Trash removal	\$3,500.00	\$3,500.00
Utilities - Electricity	\$25,000.00	\$22,500.00
Utilities - Gas	\$10,000.00	\$9,000.00
Utilities - Water/Sewer	\$2,500.00	\$2,250.00
\$153,648.00	\$126,810.00	(One-Stop Share; 16%) \$20,289.60

Square Footage in Building	17,808	
Price per square foot:	\$7.12	
Area Designated as Shared One-Stop Space	Area	Square Footage
Large Computer Area	1327.5	
Electrical & Supply Closet	156.25	
Restrooms	280	
Entrance and Stairwell	538.5	
Elevator	80	
Utility Room	225	
Conference Room	234	
Total	2,841.25	(16% of Building)

Additional Costs		
Shared Services		
Budget category	Budget Amount	Notes
Contracted Services	\$5,000.00	
	\$5,000.00	

Shared Costs		
Budget category	Budget Amount	Notes
Misc	\$5,000.00	
	\$5,000.00	

Table 4. Partner Program Budget Totals **Funding Source** **Program Administrator** **Total Program Budget**

WIOA Title I: Adult	Vermont Department of Labor	\$2,000,000
WIOA Title I: Dislocated Workers	Vermont Department of Labor	\$890,000
WIOA Title I: Youth	Vermont Department of Labor	\$2,100,000
WIOA Title I: Job Corps	Northlands JobCorps	\$8,889,700
WIOA Title I: YouthBuild	ReSOURCE	\$400,000
WIOA Title I: Migrant and Seasonal Farmworker Programs	Pathstone	\$184,000
WIOA Title III: Wagner-Peyser Employment Services	Vermont Department of Labor	\$2,200,000
WIOA Title II: Adult Education and Family Literacy Act	Vermont Agency of Education	\$928,000
WIOA Title I: Vocational Rehabilitation	Vermont Division for the Blind and Visually Impaired	\$1,200,000
WIOA Title I: Vocational Rehabilitation	Vermont Divison of Vocational Rehabilitation	\$9,473,500
Title V Older Americans Act of 1965: Senior Community Service Employment Program	Associates for Training & Development	\$1,688,700
Carl D. Perkins Career and Technical Education Act of 2006: Post-Secondary Career and Technical Education	Vermont Agency of Education	\$800,000
Trade Act of 1974: Trade Adjustment Assistance	Vermont Department of Labor	\$1,100,000
Jobs for Veterans State Grants Programs	Vermont Department of Labor	\$480,000
Community Services Block Grants: Employment and Training Activities	Champlain Valley Office of Economic Opportunity	\$113,600
Reemployment Services and Eligibility Assessments (RESEA)	Vermont Department of Labor	\$667,000
Programs authorized under State unemployment compensation laws	Vermont Department of Labor	\$6,927,000
WIOA Title I: Native American Programs	Maquam Bay of Mississquoi, Inc.	\$73,600
Temporary Assistance for Needy Families (TANF)	Vermont Economic Services Division	\$11,324,000
TOTAL	\$51,439,100	

Table 5: Vermont's One-Stop Programs and Service Locations **Career Resource Center Location** **Vermont Dept of Labor Programs** **One-Stop Partner Programs**

* = Program & services offered at a different local location

Burlington American Job Center
[Comprehensive One-Stop Location in
Vermont] 63 Pearl Street Burlington, VT 05401
[802-863-7676](tel:802-863-7676)

- WIOA Youth
- WIOA Adult
- WIOA Displaced Worker
- Jobs for Veterans
- Trade Adjustment Assistance
- Migrant & Seasonal Farm Worker
- Unemployment Insurance
- Wagner-Peyser Employment and Employer Services
- Reemployment Services and Eligibility Assessments
- Vermont Student Assistance Corporation (VSAC)
- Adult Education and Family Literacy (VAL)
- Vocational Rehabilitation
- TANF (Reach-UP)
- Blind and Visually Impaired Services
- YouthBuild (ReSource)
- JobCorps
- Champlain Valley Office of Economic Opportunity (CVOEO)
- MSFW Services; PathStone
- Technical and Community College (CCV & VTC)*
- Vermont Associates for Training and Development (CSEP)

St. Albans Career Resource Center 27 Federal Street, Suite 100 St. Albans, VT 05478 [802-524-6585](tel:802-524-6585)

- WIOA Youth
- WIOA Adult
- WIOA Displaced Worker
- Jobs for Veterans
- Trade Adjustment Assistance
- Migrant & Seasonal Farm Worker
- Unemployment Insurance
- Wagner-Peyser Employment and Employer Services
- Reemployment Services and Eligibility Assessments
- Vermont Student Assistance Corporation (VSAC)
- Adult Education and Family Literacy (VAL)*
- Vocational Rehabilitation
- TANF (Reach-UP)
- Blind and Visually Impaired Services
- MSFW Services; PathStone*
- Technical and Community College (CCV & VTC)*
- Vermont Associates for Training and Development (CSEP)*

Newport Career Resource Center Emory E. Hebard State Office Building 100 Main Street, Suite 210 Newport, VT 05855-0375 [802-334-6545](tel:802-334-6545)

- WIOA Youth
- WIOA Adult
- WIOA Displaced Worker
- Jobs for Veterans
- Trade Adjustment Assistance
- Migrant & Seasonal Farm Worker
- Unemployment Insurance
- Wagner-Peyser Employment and Employer Services
- Reemployment Services and Eligibility Assessments
- Vermont Student Assistance Corporation (VSAC)
- Adult Education and Family Literacy (NEKLS)*
- Vocational Rehabilitation
- TANF (Reach-UP)
- Blind and Visually Impaired Services
- Technical and Community College (CCV & VTC)*
- Vermont Associates for Training and Development (CSEP)*

St. Johnsbury Career Resource Center PO Box 129 1197 Main Street, Suite 1 St. Johnsbury, VT 05819-0129 [802-748-3177](tel:802-748-3177)

- WIOA Youth
- WIOA Adult
- WIOA Displaced Worker
- Jobs for Veterans
- Trade Adjustment Assistance
- Migrant & Seasonal Farm Worker
- Unemployment Insurance
- Wagner-Peyser Employment and Employer Services
- Reemployment Services and Eligibility Assessments
- Vermont Student Assistance Corporation (VSAC)
- Adult Education and Family Literacy (NEKLS)*
- Vocational Rehabilitation*
- TANF (Reach-UP)*
- Blind and Visually Impaired Services*
- Technical and Community College (CCV & VTC)*
- Vermont Associates for Training and Development (CSEP)*

Morrisville Career Resource Center 197 Harrel Street Morrisville, VT 05661-0429 [802-888-4545](tel:802-888-4545)

- WIOA Youth
- WIOA Adult
- WIOA Displaced Worker
- Jobs for Veterans
- Trade Adjustment Assistance
- Migrant & Seasonal Farm Worker
- Unemployment Insurance
- Wagner-Peyser Employment and Employer Services
- Reemployment Services and Eligibility Assessments
- Vermont Student Assistance Corporation (VSAC)
- Adult Education and Family Literacy (CVABE)*
- Vocational Rehabilitation*
- TANF (Reach-UP)
- Blind and Visually Impaired Services
- Technical and Community College (CCV & VTC)*

Barre Career Resource Center McFarland State Office Building 5 Perry Street, Suite 200 Barre, VT 05641 [802-476-2600](tel:802-476-2600)

- WIOA Youth
- WIOA Adult
- WIOA Displaced Worker
- Jobs for Veterans
- Trade Adjustment Assistance
- Migrant & Seasonal Farm Worker
- Unemployment Insurance
- Wagner-Peyser Employment and Employer Services
- Reemployment Services and Eligibility Assessments
- Vermont Student Assistance Corporation (VSAC)
- Adult Education and Family Literacy (CVABE)*
- Vocational Rehabilitation
- TANF (Reach-UP)
- Blind and Visually Impaired Services
- YouthBuild (ReSource)*
- Technical and Community College (CCV & VTC)*
- Vermont Associates for Training and Development (CSEP)*

White River Junction Career Resource Center 118 Prospect Street, Suite 302 White River Junction, VT 05001 [802-295-8805](tel:802-295-8805)

- WIOA Youth
- WIOA Adult
- WIOA Displaced Worker
- Jobs for Veterans
- Trade Adjustment Assistance
- Migrant & Seasonal Farm Worker
- Unemployment Insurance
- Wagner-Peyser Employment and Employer Services
- Reemployment Services and Eligibility Assessments
- Vermont Student Assistance Corporation (VSAC)
- Adult Education and Family Literacy (VAL)*
- Vocational Rehabilitation
- TANF (Reach-UP)
- Blind and Visually Impaired Services
- Technical and Community College (CCV & VTC)*
- Vermont Associates for Training and Development (CSEP)*

Middlebury Career Resource Center 1590 Route 7 South, Suite 5 Middlebury, VT 05753 [802-388-4921](tel:802-388-4921)

- WIOA Youth
- WIOA Adult
- WIOA Displaced Worker
- Jobs for Veterans
- Trade Adjustment Assistance
- Migrant & Seasonal Farm Worker
- Unemployment Insurance
- Wagner-Peyser Employment and Employer Services
- Reemployment Services and Eligibility Assessments
- Adult Education and Family Literacy (VAL)*
- Vocational Rehabilitation*
- TANF (Reach-UP)
- Blind and Visually Impaired Services
- YouthBuild (ReSource)
- JobCorps
- Champlain Valley Office of Economic Opportunity (CVOEO)*
- Technical and Community College (CCV & VTC)*

Rutland Career Resource Center 200 Asa Bloomer Building Rutland, VT 05701 [802-786-5837](tel:802-786-5837)

- WIOA Youth
- WIOA Adult
- WIOA Displaced Worker
- Jobs for Veterans
- Trade Adjustment Assistance
- Migrant & Seasonal Farm Worker
- Unemployment Insurance
- Wagner-Peyser Employment and Employer Services
- Reemployment Services and Eligibility Assessments
- Vermont Student Assistance Corporation (VSAC)
- Adult Education and Family Literacy (VAL)*
- Vocational Rehabilitation
- TANF (Reach-UP)
- Blind and Visually Impaired Services
- YouthBuild (ReSource)
- JobCorps
- MSFW Services; PathStone
- Technical and Community College (CCV & VTC)*
- Vermont Associates for Training and Development (CSEP)

Springfield Career Resource Center 56 Main Street, Suite 101 Springfield, VT 05156 [802-289-0999](tel:802-289-0999)

- WIOA Youth
- WIOA Adult
- WIOA Displaced Worker
- Jobs for Veterans
- Trade Adjustment Assistance
- Migrant & Seasonal Farm Worker
- Unemployment Insurance
- Wagner-Peyser Employment and Employer Services
- Reemployment Services and Eligibility Assessments
- Vermont Student Assistance Corporation (VSAC)
- Adult Education and Family Literacy (VAL)*
- Vocational Rehabilitation*
- TANF (Reach-UP)
- Blind and Visually Impaired Services
- YouthBuild (ReSource)
- JobCorps
- Technical and Community College (CCV & VTC)*

Brattleboro Career Resource Center State
Office Building 232 Main Street, Room 132
Brattleboro, VT 05301 [802-254-4555](tel:802-254-4555)

- WIOA Youth
- WIOA Adult
- WIOA Displaced Worker
- Jobs for Veterans
- Trade Adjustment Assistance
- Migrant & Seasonal Farm Worker
- Unemployment Insurance
- Wagner-Peyser Employment and Employer Services
- Reemployment Services and Eligibility Assessments
- Vermont Student Assistance Corporation (VSAC)
- Adult Education and Family Literacy (VAL)*
- Vocational Rehabilitation*
- TANF (Reach-UP)
- Blind and Visually Impaired Services
- YouthBuild (ReSource)*
- Technical and Community College (CCV & VTC)*
- Vermont Associates for Training and Development (CSEP)*

Bennington Career Resource Center 200
Veterans Memorial Drive, Suite 2 Bennington, VT
05201 [802-442-6376](tel:802-442-6376)

- WIOA Youth
- WIOA Adult
- WIOA Displaced Worker
- Jobs for Veterans
- Trade Adjustment Assistance
- Migrant & Seasonal Farm Worker
- Unemployment Insurance
- Wagner-Peyser Employment and Employer Services
- Reemployment Services and Eligibility Assessments
- Vermont Student Assistance Corporation (VSAC)
- Adult Education and Family Literacy (Tutorial Center)*
- Vocational Rehabilitation
- TANF (Reach-UP)
- Blind and Visually Impaired Services
- Technical and Community College (CCV & VTC)*
- Vermont Associates for Training and Development (CSEP)